Appendix C Index of Public Concerns

Chapter 1 Purpose and Need	1-1
The Forest Service should adopt a Roadless Area Conservation Rule	1-4
Acknowledge that roadless areas are more valuable for their non-commodity resources	
Prevent the detrimental environmental effects of roads	
Limit environmental degradation due to greater human access	
Acknowledge that roadless areas are less fire-prone than roaded areas	
Halt the loss of remaining intact forest ecosystems	1-5
End the net loss to taxpayers of road construction	
Set an example for the world	
Encourage improved stewardship of roaded areas	
Deter future legislative abuse of public lands	
Limit the discretion of local personnel to enter roadless areas	
The Forest Service should strengthen the Preferred Alternative to prohibit all destructive activities and include the Tongass.	
The final rule should assure that roadless areas are protected in perpetuity	
The scope of the final rule should be broadened to meet the stated purpose and need	
The Forest Service should clarify to the general public that the proposed rule does not	
close any existing roads or motorized trails or limit public access to national forests	1-10
The Forest Service should dismiss the "senior citizen and disabled access" argument	
against the proposed rule.	1-10
The need for preservation outweighs the need to provide access for the elderly and/or	
disabled	1-10
It is not a valid argument	
The Forest Service should not adopt a Roadless Area Conservation Rule	
Modern roadbuilding is not harmful to the environment	
There is already enough designated wilderness and protected land	
Society should make use of renewable timber resources rather than allow them to be	
wasted	
Access is needed to reduce fire hazard	
Accommodate active management of forest health for long-term benefit	1-15
The Forest Service has failed to identify a compelling purpose and need to adequately	
justify the proposed action	1-15
The Forest Service should abandon the rulemaking because existing laws and	
regulations already provide adequate protection for roadless areas.	1-16
The Forest Service should prioritize more pressing issues than the protection of	
roadless areas.	1-17
The Forest Service should not restrict public access.	
For recreation	
For the elderly, disabled, and all but the wealthy	1-18
For taxpaying citizens	1-19
The proposed rule will deny the American people legitimate access to their public lands.	1-19

The Forest Service should clarify its mission as a public land steward for the	
next century	1-20
The Forest Service should clearly state the overarching goal of the proposed rule	1-21
The goal of the proposed rule should be to increase the effective size of wilderness and	
core habitat conservation areas.	1-21
The Forest Service should recognize that its central role is to provide dispersed and	
primitive backcountry recreation.	1-22
The Forest Service should consider whether National Forest System lands should be	
managed like national parks	1-23
Manage similar to National Parks	
Do not manage similar to National Parks	. 1-23
The Forest Service should rely on sound science in its management of National Forest	
System lands	1-24
The Forest Service should give environmental and recreational uses of National Forest	
System lands the same consideration as commodities uses	1-24
The Forest Service should prioritize protection of forest ecosystems	1-25
The Forest Service should promote sustainable forest management internationally	1-25
The Forest Service should re-focus forest management on habitat restoration activities	
and ecosystem health goals	1-25
The Forest Service should manage all National Forest System lands for traditional	
multiple uses.	1-28
The Forest Service should return to decentralized management with an emphasis on	
scientifically-based resource extraction.	1-28
The Forest Service should distinguish between "conservation" and "preservation" of	
roadless areas in the Draft EIS.	1-29
The Forest Service should not significantly reduce the percentage of National Forest	
System lands available for multiple use	1-29
The Forest Service should consider that active multiple use management including	
commodity extraction is better for the environment	1-30
The Forest Service should abandon the proposed rule to maintain flexibility to meet the	
future resource needs of society	1-30
The Forest Service should manage the national forests like farms	1-31
	1-31
Multiple use management should include motorized recreation.	1-31
The Forest Service should not manage roadless areas for traditional multiple use that	
emphasizes commodity extraction.	1-32
The Forest Service should shift its management approach of roadless areas to recognize	
that recreational and ecosystem values outweigh commodity values	1-32
Multiple use management in roadless areas should emphasize non-consumptive uses	
and values	1-33
Emphasize wildlife and habitat values	
Consider the overall vitality of the ecosystem	. 1-33
The Forest Service should adopt the proposed rule to preserve commodity resources	
for the needs of future generations	1-34
Multiple use management of roadless areas should not include motorized recreation	1-34
Develop a national rule to prohibit off-road vehicle use	

Chapter 2 Consultation, Coordination, and Public Involvement...... 2-1

The proposed rule should call for continued efforts in creating compatible working	
arrangements among the Forest Service, special interests, and the general public	2-1
The Forest Service should increase local involvement in decision-making process for the	
final rule.	2-2
The Forest Service should address the impacts of the proposed rule on other agencies'	
coordination efforts.	2-3
The Forest Service should collaborate with individual state and county governments	
regarding local jurisdictions	2-3
The Forest Service should explain why the local conservation districts were not included	
in the analysis, nor included in the distribution list, as mandated by the 1996 Farm Bill	2-4
The Forest Service should do a better job of including and involving all federal land	
management agencies in its analysis	2-4
The federal government should coordinate the expansion of roadless areas onto	
non-National Forest System lands.	2-4
The Forest Service must consult with each effected nation if the final rule and record of	2 1
decision goes beyond the proposed action	2-5
The Forest Service should use the land management planning process, instead of	2 3
rulemaking, to make forest level land use decisions	2_6
The Forest Service should not use the rulemaking process as a means to circumvent	2-0
existing laws	27
The Forest Service should ensure fairness by using an open decision-making process	
The Forest Service should ensure farmess by using an open decision-making process The Forest Service should consider the timeframe being taken for this rulemaking	2-1
Ç Ç	2-8
rr	2-8
The Forest Service should invoke procedural rules on groups that file local appeals and	2.0
litigation.	2-9
The Forest Service should rely on current legal tools provided through law and	0 10
constitutional amendments in its decision-making.	
Authority does not derive from the President Authority does not derive from a series of regulations	
The final rule should reflect the wishes of the public and the President.	
The final rule should reflect good management rather than current politics	
The chief of the Forest Service is the expert and should be consulted	
Alaska's political delegation should not dictate public land management Ensure that progress will not be undone by a future administration	
The Forest Service is within its authority by proposing this rule.	
The Forest Service is within its authority by proposing this rule.	
Identify total nationwide acreage	
The Forest Service should clarify its authority to close access.	
Clarify authority to block county roads	
The political appointment of the Forest Service Chief should overlap changes in the	
administration.	2-14
The Chief of the Forest Service should not be influenced by current politics	
The chief should speak independently of the administration when presenting budget	. 2 17
requests to Congress	2-14

The Chief of the Forest Service should be solely responsible for carrying out policy and	
directing the Forest Service.	.2-14
The Forest Service should address requests for Cooperating Agency Status	
Individual states and counties should be given greater input and control over forest	
	.2-15
National Forest Systems Lands should be turned over to the respective states or counties.	
The Forest Service should use input from research stations and sustainable agriculture	- 10
policies.	.2-16
An international committee should be established to certify that timber is harvested in	10
an ecologically sound way; the import of non-certified timber should be prohibited	2-16
The Forest Service should consider that existing laws reflect the will of the people	
The Forest Service should consider citizen input when making management decisions	
Consider a nationwide vote	
Consider stakeholder concerns	
Some polls indicate a majority of people are fervently against closing public land from	
wise recreational use.	.2-18
Some polls indicate most people fervently support protection of roadless areas.	
The majority favors protection over commercial use	2-18
The Forest Service should use objective surveys rather than the existing questionable	
surveys.	2-19
The Forest Service should not allow special interests to unduly influence or appear to	. = 1)
influence public land management decisions.	2-20
Do not allow undue influence from commercial and extractive interests	
Do not accept funds from Off-Highway Vehicle groups	
Allow only those concerned about forest health to influence policymaking	
Do not allow undue influence from environmental groups	
The Forest Service should consider the interests of those intentionally locked out of the	
planning process by influential special interests	. 2-22
The Forest Service should consider the interests of all recreational user groups	
Include the off-road vehicle community	
Management decisions should be made at the local level.	
Adopt the No Action Alternative to ensure continued local control	2-25
Implement existing locally developed forest plans	
Forest supervisors should manage roadless areas	
Management decisions should be made at the national level.	
Forest Service cannot be trusted to implement locally	
Local planning efforts have failed to resolve issues	2-27
The final rule should prevent local decision makers from circumventing the intent	
of the rule	
By providing specific, clear, and concrete criteria for implementation	
By determining off-road vehicle use	2-28
By preventing local managers from constructing roads for the purpose of blocking	• •
future roadless consideration	2-28
The proposed rule should clearly disclose that the Forest Service would be the ultimate	• •
decision maker.	
The Forest Service should clarify who is in charge at the local level	2-29
The Forest Service should realize the implementation of the proposed rule would cause	0.00
controversy, appeals, and lawsuits	. 2-30

The Forest Service should not purposely cause confusion by separately releasing several	
documents that are inherently integrated.	2-30
Public land management should not be politically motivated.	2-30
The Tongass National Forest exemption is politically motivated	. 2-32
The public input process is a means to hide the political use of this initiative	. 2-32
The Forest Service should delay the proposed rule until Congress completes its	
investigation of improprieties in developing the rule.	2-32
The Forest Service should instruct its agency employees to speak with sensitivity and	
	2-32
The Forest Service should not disseminate false reports that forests have regrown when	
	2-33
The Forest Service should not mislead the public about which roads and trails would be	
	2-33
The Forest Service should not mislead the public about the effects of the proposed rule by	
	2-34
The Forest Service should not mislead the public by including alternatives that would	2 3 1
	2-34
The Forest Service should disclose whether the real goal of this proposed rule is to save	2-34
ecosystems or to appease environmentalists while continuing to allow destructive	
• • •	2-34
	2-34
The Forest Service should disclose whether the real goal of this proposed rule is simply	2-34
1 5 6	2-34
The Forest Service should disclose whether the real goal of this proposed rule is to	2.25
	2-35
The Forest Service should disclose whether the real goal of this proposed rule is to	0.05
	2-35
The Forest Service should disclose whether the real goal of this and recent rulemakings	0.00
1 1	2-36
The Forest Service should disclose whether the proposed rule is intended to help the	
Forest Service comply with commitments made to the International Union for the	
	2-36
The Forest Service should use balanced and objective data and language to clearly and	
• 1	2-38
The Forest Service should remove insulting and discriminatory language and eliminate	
	2-39
Issue a public apology	. 2-40
The Forest Service should remove the bias created by using questionable references and	
	2-40
The Forest Service should modify language contained in the Draft EIS that could be	
used to discount recreational values.	2-41
The Forest Service should issue a supplement to the Draft EIS pursuant to 40 CFR	
1502.9, "to address the significant new circumstances and information" and 40 CFR	
1502.9(a) "to address the inadequacies that preclude meaningful analysis."	2-41
The Forest Service should address contradictions within the Draft EIS.	
The Forest Service should address discrepancies between the summary and the	
Draft EIS regarding local authority prior to plan revisions.	2-42

The Forest Service should reassess the broad, unsubstantiated assumptions used in the	
Draft EIS.	.2-42
The Forest Service should cite references to support statements made in the Draft EIS	.2-43
The Forest Service should replace the use of qualitative discussions and estimates with	
	.2-43
No scientific data supports the roadless plan in the Tongass	. 2-43
The Forest Service should use scientific methods and analyses in reviewing this	
	.2-44
The Forest Service should incorporate the data and findings provided by the public	
	.2-44
The Forest Service should address the need for technical expertise during local	
	.2-44
The proposed rule should call for continued public processes and information sharing	
Local managers should be accessible	
Information should be disseminated	
The Forest Service should give adequate notice of public meetings	
Give advance notice of format and agenda	
The Forest Service should set an adequate number of public meetings at convenient	
times and locations	.2-47
The Forest Service should ensure that the meetings are fairly conducted	
By reserving large enough meeting rooms	
By recording comments at all public meetings	
The Forest Service should modify the PowerPoint presentation.	
The Forest Service should make its presentations in public meetings clear and accurate	
By providing materials and definitions	
By use local photographs as examples	
The Senate should investigate the Forest Service's handling of public meetings	. 2-50
The Forest Service should allow people to bring signs to public meetings	2-50
The Forest Service should consider the appropriateness of allowing preservation	
organizations to sell merchandise at public meetings	2-50
The Forest Service should extend the comment period.	
Additional 60 days	. 2-51
Additional 90 days	. 2-52
Additional 120 days	. 2-52
Until September, 2000	
Until December 31, 2000	
Until the current administration has ended	
The Forest Service should not extend the comment period	2-53
The Forest Service should provide sufficient information regarding the potential	
effects of all recently proposed plans so the public may be better informed	2-54
The Forest Service should address the adequacy of the scoping process and subsequent	
information disclosed in the Draft EIS.	
The Forest Service should create more opportunities for public input	
By improving notification and mailings	
By providing internet access to documents	
By improving information access for those without computers	
By mailing out questionnaires	
By surveying forest users	. 2-56

The Forest Service should avoid soliciting emotionally charged comments	2-56
The Forest Service should not announce the number of comments received while	
the comment period is open	2-56
The Forest Service should give assurance that the public's comments are considered	2-56
The Forest Service should consider input from Forest Service employees, and clarify	
its policy regarding such input.	2-57
The Forest Service should consider that written public comment is sometimes based on	
inaccurate assumptions or information.	2-58
Due to inadequate understanding of the proposed rule and the Tongass exemption	2-58
Due to methods used by special interest groups	2-58
The Forest Service should consider that public meeting comment is skewed	2-59
The Forest Service should consider opinions of individuals equally with those of special	
interests.	2-60
The Forest Service should disclose how much weight is given to local comments	2-60
The Forest Service should acknowledge that comments received during the scoping	
period were not adequately considered, given such a short turn around and large	
volume	2-60
The Forest Service should improve its quality of content analysis.	2-60
The Forest Service should address its process for gauging public opinion	2-61

The proposed rule should protect civil liberties and constitutional property rights	3-2
The Forest Service should not violate the "Takings Clause" of the Fifth Amendment	
of the Constitution	3-2
The proposed rule should comply with the First Amendment	3-3
The government should limit its land ownership to only five percent of the land	3-3
The proposed rule should comply with the Tenth Amendment of the Constitution	3-3
The Forest Service should honor states' rights	3-3
To regulate air and water quality	3-3
To regulate wildlife	3-4
To manage watersheds	3-4
To manage transportation systems	
To manage school trust lands	3-4
Congress should have the only decision-making authority over federal lands pursuant to	
the property clause of the Constitution.	3-4
The Forest Service should comply with the Administrative Procedures Act.	3-7
By providing sufficient data for meaningful public comment	3-8
By following rules on ex-parte communication	3-8
By not being arbitrary	3-8
The Forest Service should comply with the Federal Advisory Committee Act.	3-9
By obtaining balanced representation from outside interest groups	3-9
The Forest Service should use other methods of dispute resolution	3-9
The Forest Service should comply with the Freedom of Information Act.	3-10
The proposed rule should comply with the Civil Rights Act	3-10
The Forest Service should comply with the Americans with Disabilities Act.	3-10

The proposed rule should comply with the National Outdoor Recreation Act	3-11
The Forest Service should comply with the Contract with America Act by providing	
a report to Congress.	.3-11
The proposed rule should comply with the Government Performance and Results Act	
The Forest Service should comply with the Surface Transportation Assistance Act	
of 1978 by granting access to inholders	3-11
The proposed rule should comply with the Paperwork Reduction Act.	
The Forest Service should comply with the Regulatory Flexibility Act.	
By correcting inadequacies in the Initial Regulatory Flexibility Analysis	
By analyzing the impacts on motorized recreation businesses	
By analyzing the impacts on the timber industry	
By analyzing the impacts on the mining industry	
By providing a comprehensive or cumulative impact analysis	. 3-15
By completing an economic impact analysis	. 3-15
By compensating rural communities for lost economic benefits	. 3-16
Forest level decisions regarding the proposed rule should require a Regulatory	
Flexibility Analysis	.3-16
The proposed rule should comply with the Small Business Regulatory Enforcement	
Fairness Act.	3-16
By not dividing the project into smaller segments	
The proposed rule should comply with the Unfunded Mandates Reform Act	3-17
The proposed rule should be withdrawn until it has been subjected to analysis pursuant	
to Executive Order 12630 and reviewed by Congress	. 3-19
The forest Service should comply with Executive Order 12612.	3-19
The proposed rule should comply with Executive Order 12866.	3-19
The proposed rules should comply with Executive Order 12898, Environmental Justice	.3-19
The Forest Service should adhere to Executive Order 11644 regarding off-road vehicle	
use, and should determine, at the national level, the appropriateness of such vehicles	
in roadless areas.	.3-20
The proposed rule should comply with Executive Order 12988	.3-21
The proposed rule should disclose the effects of the prohibition alternatives per	
Executive Order 11593.	. 3-21
The proposed rule should maintain road access as defined by boards of county	
commissioners	.3-21
The Forest Service should not usurp local authority to control the establishment or	
alteration of roads.	.3-22
County authority	
State authority	
The proposed rule should comply with the 1905 New Mexico Territorial Act	. 3-23
The proposed rule should adhere to the principles of the Treaty of Guadalupe Hidalgo	
and Article IV of the New Mexico State Constitution	.3-23
The Forest Service should honor states' valid existing water rights.	.3-24
The Forest Service should honor the Supreme Court decision on United States	
v. New Mexico	. 3-24
The Forest Service should comply with the court ruling from the United Four Wheel	
Drive Association lawsuit.	. 3-25

The proposed rule should comply with the National Environmental Policy Act.	3-27
By providing an early and open scoping process	3-28
By adequately responding to scoping comments	3-29
By collaborating with local stakeholders	3-29
By Cooperating with local agencies	3-29
By Consulting with federal agencies	3-29
By circulating the Draft EIS according to Council on Environmental Quality (CEQ)	
Regulations, Part 1502.19	
By not rushing this process	
By not presenting false facts	
By providing an accurate summary	
By providing sufficient information for the public to evaluate	
By addressing inadequacies that preclude meaningful analysis	
By addressing significant new information	
By adequately describing the affected environment	
By providing a full and fair discussion of significant environmental impacts	
By conducting an area-by-area effects analysis	
By providing a cost/benefit anaylsis	
By describing direct and indirect effects and conflicts with other plans	
By including a cumulative effects analysis	
By considering cumulative impacts of multiple proposals	
By creating an analytic document	
By providing a document of scientific integrity	
By not using "selective science"	
By providing an adequate range of alternatives	
By using a proper baseline for comparison of alternatives	
By providing objective analysis of all reasonable alternatives	3-39
The Forest Service should comply with the Council on Environmental Quality	2 40
regulations.	
By providing accurate scientific analysis	
By not creating a "verbose" document	3-40
The Forest Service should comply with the environmental standards of the National	• • •
Environmental Policy Act by restricting motorized recreation on public lands	3-40
Forest level decisions regarding the proposed rule should be subject to National	
Environmental Policy Act review and comment.	3-41
The Forest Service should eliminate references to spiritual renewal in National	
Environmental Policy Act documents.	3-41
The Forest Service should support legislation amending the National Environmental	
Policy Act	3-41
The Forest Service should clarify whether the National Environmental Policy Act	
process is unconstitutional.	3-41
The Forest Service should comply with the Endangered Species Act	
The proposed rule should clarify whether state or federal governments have	
jurisdiction over environmental compliance of off-highway vehicle grants.	3-13
The Forest service should address the interaction of the proposed rule with Class 1	J- - J
• •	2 12
areas under the Clean Air Act The Forest Service should address the proposed rule's violation of the Federal Land	3-43
	2 1 1
Policy and Management Act	3-44

The proposed rule should comply with the Federal Land Policy and Management Act	
of 1976	
By coordinating plans with other agencies, states, and local governments	3-44
By establishing utility planning corridors	3-44
The Forest Service should comply with the Multiple Use and Sustained Yield Act	. 3-45
By considering the values of all resources	
By not elevating one resource over any others	3-46
By meeting the non-impairment standard	3-46
By completing an area-by-area analysis	3-47
The Forest Service should manage the forests for watershed and timber extraction, as	
mandated by the Organic Act.	
The proposed rule should comply with The Transfer Act.	. 3-49
The Forest Service should meet the requirements of the Renewable Resources	
Planning Act and its supporting regulations.	
The Forest Service should respect local planning processes, as mandated by the National	
Forest Management Act.	
The proposed rule should comply with the National Forest Management Act.	
By recognizing that rulemaking authority does not negate National Forest Management	
Act requirements	3-51
By meeting consistency requirements of the National Forest Management Act	
By creating "one integrated plan" for each forest	
By completing long range forest planning at the forest level	
By informing Congress of the roadless initiative	
By coordinating with stakeholders	
By coordinating planning efforts with tribes and Native Alaskans	3-52
By coordinating with other public planning efforts	3-53
By providing meaningful public participation	
By securing the views of a committee of scientists	
By developing an amendment for significant changes	
By setting timber harvest goals	
By protecting the environment	
By maintaining roadway standards	3-55
By following National Forest Management Act processes in designating wilderness and	
roadless areas	
The proposed rule should comply with the planning regulations.	
By completing site specific analysis	
By providing scientific analysis	
By Consulting a committee of scientists	3-56
The proposed rule should use the current planning regulations' criteria for evaluating	0.54
roadless areas.	
The Forest Service should abide by the Wilderness Act of 1964.	
The proposed rule should comply with state wilderness acts.	
California Wilderness Act of 1984	
Oregon and Washington Wilderness Acts	
Wyoming Wilderness Act	
Montana Wilderness Study Act	
Colorado Wilderness Act	
Utah Wilderness Act of 1984	
Idaho Wilderness Act	3-60

Michigan Wilderness Act	3-61
Nevada Wilderness Act	
New Hampshire Wilderness Act of 1994	3-61
The Forest Service should disclose the legislative history that allowed 21 states to pass	
legislation increasing wilderness.	3-61
The Forest Service should support the proposed American Red Rock Wilderness Act	3-61
The Forest Service should honor RS2477 rights-of-way	
County rights-of-way	
The Forest Service should resolve RS 2477 claims before the proposed rule is adopted	3-63
The Forest Service should reevaluate the relationship between the Tongass Timber	
Reform Act and the proposed rule.	3-64
Amend section 101	
The Forest Service should comply with the Tongass Timber Reform Act	3-65
The proposed rule should comply with the Alaska National Interest Land Conservation	
Act.	3-66
With regard to subsistence lifestyles	. 3-66
By guaranteeing access to inholders on all national forests	
By prohibiting single use studies	3-67
The Forest Service should allow access across national forests in Alaska relative to	
provisions in the Alaska Native Claims Settlement and Alaska National Interest	
Conservation Acts	3-67
The Forest Service should exercise its statutory authority under Alaska National Interest	
Land Conservation Act to determine adequate access on a case-by-case basis	3-67
The Forest Service should address the effectiveness of the Alaska Forest Practices Act	3-68
The proposed rule should adhere to the principles in the Tongass Land Management	
Plan	3-68
The proposed rule should comply with the Alaska Native Claims Settlement Act	3-68
The proposed rule should comply with the Alaska Statehood Act	3-69
The Forest Service should keep the promise made in the 1924 Clark-McNary Act	3-69
The Proposed Rule should comply with the intent of the Roads and Trails Act and the	
Renewal Resources Planning Act.	3-70
The proposed rule should comply with Special Use regulations in 36 Code of Federal	
	3-70
The Forest Service should comply with the purpose of the National Recovery Relief Act	3-71
The proposed rule should provide "community stability" as required by Timber	
Management Planning.	3-71
The proposed rule should comply with the intent of the Weeks Act	
The Forest Service should revise funding by repealing the Knutson-Vandenburg Act	
of 1930.	3-71
The U.S. Government should establish review panels to settle disputes between land	
management and regulatory agencies.	3-72
The Forest Service should develop a modified Public Land Law Review Commission	
The Forest Service should comply with the General Mining Law of 1872	
By not allowing recreational placer mining in roadless areas	
The Forest Service should repeal the 1872 Mining Act.	
	3-14
The Forest Service should revise the 1872 Mining Act	

The Proposed Rule should comply with the National Materials Research and	
	.3-74
The Proposed Rule should comply with the Mining and Minerals Policy Act of 1970	.3-75
The proposed rule should comply with the Leasing Reform Act.	
The Forest Service should comply with the Federal Coal Management Program	
regulations by completing an unsuitability analysis before withdrawing land from	
coal leasing activities.	.3-75
The Forest Service should use Smith River National Recreation Area regulations on	
mining as a model for roadless areas conservation	.3-76
The Forest Service mining regulations should be revised and subject to public review	
under the National Environmental Policy Act.	.3-76
The proposed rule should comply with the Forest Service Manual for mineral	
withdrawal	.3-76
The Forest Service should exercise its statutory authority to restrict the mode of access to	
mining claims	
The Forest Service should evaluate various processes used to determine mining	
development rights	. 3-78
The final rule should comply with federal laws governing mining by requiring that valid	
existing rights apply only to valuable mineral deposits	. 3-79
Court rulings	
The Forest Service should provide mining access.	
Exploration access	
The proposed rule should be consistent with existing laws as they relate to mining	. 3-83
Federal Land Policy and Management Act	
Organic Act	
Multiple Use Sustained Yield Act	
USFS regulations and directives	
Wilderness Act	
Surface Resource and Multiple Use Act of 1955	3-86
The Forest Service should complete hydrocarbon inventories required by the proposed National Energy Security Act.	2 96
The Forest Service should oppose the Conservation And Reinvestment Act.	
The Forest Service should oppose the Conservation And Reinvestment Act	
	. 3-80
The Forest Service should support the enactment of the Northern Rockies Ecosystem	. 3-87
The Forest Service should support the National Forest Protection and Restoration Act	. 3-07
The Forest Service should compensate for the loss of school funding from decreased	
timber harvest by supporting the Secure Rural Schools and Community	2 00
Self Determination Act. Congress should pass legislation to prohibit the use of polluting off-road vehicles.	
	. 3-00
The Forest Service should honor the United States' treaty obligations with Native	2 00
American peoples	. 3-88
The Forest Service should revise the exemptions for road building to include tribal treaty	. 3-89
rights The proposed rule should deny access to roadless areas in order to honor treaty rights	
The proposed rule should delly access to roadless areas in order to nonor iteaty rights	. 5-09

C	Chapter 4 Alternatives and Rule Development	4-1
	The Roadless Initiative should be separated into three parts: one that addresses activities to be restricted, one that addresses off-road recreational use, and one that addresses other management issues in these areas.	4-2
	The Forest Service should clarify how the value of roadless areas would differ under the	4-2
	various alternatives of the proposed rule.	4-2
	The Forest Service should address contradictions between Alternatives 2 and B	
	The Forest Service should combine Alternatives 2 and 3 in order to protect areas from timber harvesting.	4-2
	The Forest Service should compare all proposed action alternatives with the No Action	4-2
	Alternative	1 0
	The Forest Service should use a proper baseline for comparing alternatives	4-3
	Alternatives in the proposed rule should focus on the best way to manage land and resources rather than on prohibitions	4-3
	The type of activities to be allowed in roadless areas should be clearly spelled out in the	
	Environmental Impact Statement.	13
	The Forest Service should expand the range of alternatives for the proposed rule	
	Allow the use of temporary roads	
	Vary the amount of roadless acres	
	The Forest Service should provide alternatives that have distinct differences	
	The Forest Service should provide alternatives that have distinct differences	
	The Forest Service should consider an alternative that allows road building, continued	- -J
	access, and multiple use management.	15
		4-5
	The Forest Service needs to consider an alternative that carefully considers the impacts	15
	of recreation, timber, and mineral interests in Regions 8 and 9.	
	The Forest Service should develop an "access for all" alternative	4-0
	The Forest Service should prepare an alternative that assigns the decision-making	1.0
	authority based on local conditions	
	The Forest Service should adopt a new Alternative 5.	4-6
	The Forest Service should consider an alternative that would not ban road construction in	
	inventoried roadless areas that were considered in post-1995 revisions to forest plans	
	ALTER.818 The Forest Service should create a leaseable minerals alternative	4-7
	The Forest Service should consider an alternative that returns treaty-ceded lands to	
	traditional native peoples	4-7
	The Forest Service should consider an alternative that prohibits road building and timber harvest in roadless areas associated with drinking water	4-7
	The Forest Service should address false assumptions in the Prohibition Alternatives	
	The Forest Service should clarify the prohibition alternatives dealing with timber harvest.	
	The Forest Service should explain what criteria were used to determine that road	
	construction and timber harvest qualify as prohibited acts	4-8
	The Forest Service should implement Alternative 3 west of the 100 th Meridian and	
	Alternative 4 east of the 100 th Meridian.	4-8
	The Forest Service should adopt the No Action Alternative.	
	Manage wildlife within Nevada	
	More study is needed.	

The Forest Service should adopt a modified version of Alternative 1.	
Land use education and funding	4-10
The Forest Service should adopt Alternative 1D.	
The Forest Service should adopt the Preferred Alternative.	
The Forest Service should modify its Preferred Alternative.	
Allow off-highway vehicle access	
Include all recreational values	4-11
Protect species	4-11
The Forest Service should adopt Alternative 2C.	. 4-11
The Forest Service should adopt Alternative 2D.	
The Forest Service should not adopt the Preferred Alternative	
The Forest Service should cite studies which support the Preferred Alternative.	. 4-12
The Forest Service should adopt Alternative 3.	
The Forest Service should adopt a modified version of Alternative 3.	
Include a moratorium on road building in the Tongass	4-13
Include fire prevention measures	4-13
Include a public oversight process	
The Forest Service should adopt Alternative 3C.	
The Forest Service should adopt Alternative 3D.	. 4-13
The Forest Service should adopt Alternative 3DT4.	.4-14
The Forest Service should clarify what activities will be allowed under Alternative 3	
The Forest Service should adopt Alternative 4	.4-14
Prohibit grazing	
Prohibit mining, grazing, off-highway vehicles, and commercial development	4-15
The Forest Service should clarify whether Alternative 4 would allow harvest of	
"dead and down" trees	
The Forest Service should adopt Alternative 4A.	
The Forest Service should adopt Alternative 4B.	
The Forest Service should adopt Alternative 4D.	
The Forest Service should adopt a modified version of Alternative 4D	. 4-15
The Forest Service should adopt a modified version of Alternative 4DT3	.4-16
The Forest Service should adopt Alternative 4DT4.	.4-16
The Forest Service should adopt a modified version of Alternative 4DT4.	
The Draft EIS should list the actual procedures to be implemented	
The Forest Service should clarify the criteria to be used to designate future roadless	
areas.	4-17
The proposed rule's forest and project level planning procedures should reflect the need	
for consistency and provide parameters and standards to guide local decision makers.	
The Forest Service should ensure that under the procedural alternatives local	
participation is not dominated by economics.	
The Forest Service should more thoroughly analyze the Procedural Alternatives	
The Forest Service should adopt Alternative A.	
The Forest Service should implement Procedural Alternative B	
The Forest Service should not adopt Procedural Alternative B	
Under Procedural Alternative B the Forest Service should limit the authority of local	/
managers to protect roadless areas from local user group pressures.	
The Forest Service should implement Procedural Alternative C	
The second second improvement is recorded in the induction of the second s	/

The Forest Service should adopt Procedural Alternative D	.4-20
The Forest Service should provide the scientific basis for excluding the Tongass	
National Forest from the proposed rule.	.4-21
The Forest Service should defer action on the Tongass National Forest	. 4-21
The proposed rule should protect the Tongass National Forest from the timber industry	
The Forest Service should prohibit road building on the Tongass National Forest	.4-22
The Forest Service should allow road construction on the Tongass National Forest	. 4-22
The Forest Service should protect at least half of the inventoried roadless areas in the	
Tongass National Forest.	. 4-22
The Forest Service should include all inventoried roadless areas over 25,000 acres and	
adjacent to wilderness areas in the Tongass National Forest	.4-22
The Forest Service should consider a 50 year moratorium on activities in roadless areas	
of the Tongass National Forest.	. 4-22
The Forest Service should not wait four years to realize that there are sufficient roads to	
meet timber, recreational and subsistence access needs in the Tongass National	
Forest	. 4-22
The Forest Service should treat the Tongass National Forest as an equal share of	
America's National Forest legacy.	
The Tongass should be considered a North American Natural Heritage Area	. 4-23
The Forest Service should implement and evaluate the Tongass Land Management Plan	
The Forest Service should adopt Alternative T1.	. 4-23
The Forest Service should adopt Alternative T2.	
The Forest Service should not adopt Alternative T3.	
The Forest Service should adopt Alternative T4.	
Inland waterways	
Recreation	
Local decision-makers	
Wildlife habitat Evolution	
The Forest Service should phase out timber harvesting and road building in the Tongass	4-20
National Forest within ten years.	1-26
The Forest Service should cease all proposed or planned timber harvest operations in	. +-20
roadless and unroaded areas pending revision of forest plans	4-27
The Forest Service should not proceed with any currently planned road construction	. –-27
projects in roadless areas until the final decision is made.	4-27
The Forest Service should continue current plans for timber harvest, road construction,	. –-27
and trail building until new forest plans are adopted	4-27
The Final EIS should include all roadless areas that were included in the Draft EIS.	
The Forest Service should include Wilderness Study Areas in roadless area inventories	
The Forest Service should metude winderness study meas in roadless area inventories The Forest Service should protect all remaining univentoried roadless areas	
Uninventoried roadless areas provide the same values as inventoried areas	
Mandate follow-up planning	
The Forest Service should include the roaded areas identified as part of the national	-
forest roadless areas in the proposed rule.	. 4-29

The Forest Service should designate roadless areas based on their biological value, not	
on their roaded status.	4-29
Protect biologically significant areas of any size	
Protect species from extinction	
The Forest Service should protect all roadless areas regardless of size.	
The Forest Service should protect all roadless areas of 10 acres or more.	
The Forest Service should protect all roadless areas larger than 50 acres	
The Forest Service should protect all roadless and unroaded areas larger than 160 acres	
The Forest Service should protect all roadless and unroaded areas larger than 200 acres	
The Forest Service should protect all unroaded areas larger than 300 acres	
The Forest Service should protect all roadless areas larger than 400 acres	
The Forest Service should protect all roadless areas larger than 500 acres	
The Forest Service should protect all roadless areas larger than 639 acres	4-32
The Forest Service should protect all roadless areas larger than 640 acres	4-33
The Forest Service should protect all inventoried and uninventoried roadless areas larger	
than 1000 acres.	
The Forest Service should protect all roadless areas larger than 2000 acres	4-33
The Forest Service should protect all roadless areas larger than 1000 acres east of the	
Mississippi River	4-33
The Forest Service should protect all roadless areas larger than 2500 acres in the eastern	
United States.	4-33
The Forest Service should protect all roadless areas of 1000 acres or more that are	
within 10 miles of another roadless area or a national park	4-33
The Forest Service should justify its choice of 5000 acres as the minimum size for	
roadless areas.	
Eastern forests	
The Forest Service should preserve ecosystems by establishing laws without loopholes	4-34
The Forest Service should include language that minimizes "other exemptions" in the	
alternatives.	
The proposed rule should allow exemptions and waivers.	4-34
The Forest Service should clarify the duration and statutory authority of the	
proposed rule	4-36
The Forest Service should clarify whether the proposed rule will apply to national	
monuments	
The Forest Service should clarify whether beaches are roadless areas.	
The proposed rule should clarify how many of the 53 million acres will be protected	
The proposed rule should call for site-specific evaluations of roadless areas	4-37
The proposed rule should not supercede projects which have already met all legal	
requirements	
The proposed rule should leave land allocation decisions to forest planning	4-37
The Forest Service should clarify whether the proposed rule will require land use	
designation changes and amendments to forest plans	4-37
The Forest Service should consider that the proposed rule would override existing	
forest plans involving water management.	4-38
The Forest Service should consider that the proposed rule would hinder the resolution	
of key issues in forest plans.	4-38

The Forest Service should address the effects of this proposed rule on forest plans	
throughout the nation	4-38
Sierra Nevada Framework Project	4-38
Southern Appalachians	4-38
The Forest Service should consider that the proposed rule essentially makes forest plans	
meaningless	
The Forest Service should not adopt the proposed rule	4-39
The proposed rule necessitates the consideration of wilderness designation	
Wilderness designation may occur without regard for recreational opportunities	4-39
The majority of roadless areas have already been evaluated and deemed not suitable for	4.00
wilderness status	
There are already enough roadless and wilderness areas	
Existing forest management plans already ensure a healthy environment	
The Forest Service should perform a new road inventory The Final EIS should reflect inventories and evaluations that are no more than	4-41
	4 40
five years old.	4-42
The Forest Service should include land acquired since previous inventories were	4 40
completed.	4-42
The Forest Service should state when it will conduct an inventory of the uninventoried	4 40
roadless areas.	
The Forest Service should rely on the RARE I inventory for roadless designations	
The Forest Service should include all RARE II areas as part of the final rule	4-42
The Forest Service should modify language in the Draft EIS to acknowledge that	
RARE II and forest plan inventories do not reflect new knowledge and public	
awareness of the important values of roadless areas.	4-43
The Forest Service should explain the extent and impacts of road-building and timber	
harvest in RARE II roadless areas.	4-43
The Forest Service should reevaluate the adequacy of the RARE II Inventory analysis	4-43
The Final EIS should clarify what characteristics the Forest Service wants to protect	
for each inventoried roadless area	4-43
The Forest Service should identify roadless area characteristics which are clear and	
not open to competing interpretations	4-44
The Forest Service should consider establishing criteria for roadless area	
implementation.	
The Forest Service should revise the list of characteristics and values of roadless areas	
The Forest Service should consider "lack of roads" as a "roadless characteristic."	4-44
Part 294.13(a) of the final rule should include new evaluation criteria for scenic	
management, historical areas, and wilderness potential.	4-45
Part 295.13a of the final rule should eliminate reference to dispersed motorized	
recreation as a characteristic of roadless areas.	4-45
The Forest Service should consider that no discrete set of criteria can characterize	
the unique values and characteristics of individual roadless areas	
The Forest Service should conduct a state-by-state analysis of roadless areas	4-46
The Forest Service should use a computer-based modeling system to assign values	
of use and condition to inventoried roadless areas.	4-46
The Forest Service should establish depth and width criteria to assure that irregularly	
shaped roadless areas remain manageable	4-46

The Forest Service should state the overall size of non-inventoried areas and address the
potential impacts of this rule on those areas
The Forest Service should add smaller uninventoried roadless areas to the current
roadless inventory
The Forest Service should exclude unsuitable roadless areas from the roadless inventory4-47
The Forest Service should clarify why the estimated roadless acreage has grown over the
course of planning for the proposed rule
The Forest Service should not declare large areas of the national forests roadless without
first conducting an inventory of these areas for existing trails
The Forest Service should inventory any roadless area of 1000 acres or more
The Forest Service should reevaluate the number of roads in New England and
Mid-Atlantic forests
The Forest Service should re-inventory areas within the Hoosier National Forest
The Forest Service should resurvey Arizona to ensure accurate roadless acreage
The Forest Service should identify additional unroaded areas in the Chippewa and
Superior National Forests
The Forest Service should carry out road classification on a regional basis
The Forest Service should consider that the speed with which this initiative is being
implemented is causing inaccurate roadless classifications
The Forest Service should create a new category of "unroaded" areas
The Forest Service should change the definition of "unroaded" to "a portion of an
inventoried roadless area in which no classified road has been constructed since the
area was inventoried."
The Forest Service should refer to areas with pre-inventory roads as semi-roadless areas
and clarify how they will be affected by this rule4-50
The Forest Service should not designate roadless areas which contain 2477 rights of way
through them
When delineating roadless areas, the Forest Service should classify temporary roads
as roads4-50
The Forest Service should include historic roads in its roadless area inventory
The Forest Service should include all existing roads and 4-wheel drive routes in the
roadless area inventory
The Forest Service should recognize the existence of trails less than 50 inches wide
The Forest Service should clarify whether decommissioning or obliterating roads would
create a roadless area
The Forest Service should consider for roadless designation, areas with a few roads that
could be blocked or obliterated4-51
The Forest Service should not allow "ghost" roads to disqualify an area as roadless4-51
Areas with primitive roads, jeep trails, or classified roads should not be disqualified from
roadless designation4-52
The Forest Service should clarify the status of "phantom roads" to ensure that road
construction could not be performed under the guise of repairing existing roadways 4-52
The Forest Service should explain how the roaded portions of inventoried roadless
areas will be delineated4-52
The Forest Service should consider removing areas that cannot be harvested with
temporary roads from the roadless area classification

The Forest Service should discontinue the use of the term roadless to describe areas	
which contain forest products	4-52
The Roadless Area designation should be eliminated.	4-52
The Forest Service should be consistent in statements regarding the possible future designation	ation
of roadless areas as wilderness areas.	4-54
The Forest Service should judge each roadless area independently on its own merits for	
wilderness designation.	4-54
The Forest Service should manage all roadless areas so as to protect their eligibility for	
wilderness designation.	4-54
The Forest Service should designate and maintain all remaining roadless areas as	
wilderness in perpetuity.	4-54
Yaak valley	. 4-54
Tongass National Forest	. 4-54
Idaho	
Estuaries and wetlands	
The Forest Service should quickly assess lands which qualify as wilderness	4-55
The Forest Service should designate wilderness areas in response to population increases.	4-55
The Forest Service should use watershed boundaries to delineate roadless areas	4-55
The Forest Service should clarify whether stewardship activities and temporary roads	
would disqualify an area from potential wilderness designation	4-55
The Forest Service should consider designations other than wilderness	4-56
The Final EIS should recommend to the President that all roadless areas be designated	
national monuments	4-56
The Forest Service should postpone the wilderness recommendation process until the	
next round of forest plan revisions	4-56
The Forest Service should not attempt to designate any more wilderness areas	

Chapter 5 Environmental Effects 5-1

The Forest Service should consider the ecological value of roadless areas.	. 5-2
Roadless areas lack ecological value	. 5-2
Roadless areas have ecological value	
Forests prevent acid rain	
Forests in a natural condition preserve ecological balance	. 5-2
The Forest Service should include humans as part of the ecosystem	. 5-2
The Forest Service should reconsider the historic range of variability as a viable	
management goal.	. 5-3
Due to legal and practical limitations	
Due to the dynamic nature of the historic environment	. 5-3
The Forest Service should develop plans for managing large-scale disturbances in roadless	
areas.	. 5-4
Long-interval fire regimes	
Catastrophic precipitation and runoff events	. 5-4
The Forest Service should consider the use of environmental buffer zones	.5-4
Around roadless areas	. 5-4
Use roadless areas as buffer zones adjacent to wilderness	. 5-5
Delete any discussion and reference to buffer zones around wilderness	. 5-5

The Forest Service should address the litter left by recreational users	. 5-5
Through user financed litter management	. 5-5
By reducing road access	
By limiting motorized use of the backcountry	
By allowing motorized users to clean up the backcountry	
The Forest Service should control noise pollution on system lands	
By prohibiting roadbuilding	. 5-6
By restricting off-highway vehicle use	. 5-7
The Forest Service should preserve roadless areas	
For ecosystem services	
For ecosystem health	
As viable examples of wild unroaded ecosystems	
The Forest Service should protect a wide range of ecosystem types and elevations	. 5-8
The Forest Service should consider "Alternative 5" as the most effective way to preserve	
the wild areas.	
The Forest Service should consider the benefits of human activity to the ecosystem	
The Forest Service should explain how nitrogen from gasoline impacts the environment	. 5-9
The Forest Service should address the impacts of building roads on small sized	
ecosystems	. 5-9
The Forest Service should consider the impacts of cattle on springs, streams, and native	
grasses	. 5-9
The Forest Service should rewrite the ecological factors section in the Draft EIS in an	
objective manner, providing specific quantitative analysis and evidence	5-10
The Final EIS should include an analysis of the effects of the proposed rule on species	
diversification and the water cycle.	5-11
The Forest Service should separate the discussion of the effects of roads from the	
effects of road uses	5-11
The Forest Service should provide data indicating the negative effect of the road system	
on the environment.	5-11
The Forest Service should address the effects of off-highway vehicle use on roadless	
areas and wilderness values.	5-11
The Forest Service should use best available science to manage roadless areas	
To assess the importance of roadless areas	
For timber and fire management	
For geographic area analysis	
Remote sensing technology	5-13
Adaptive management and monitoring	
The Forest Service should clarify the difference between reference landscapes and	
research natural areas.	5-14
The Forest Service should study the impacts of off-highway vehicles by allowing various	
intensities of use on ecologically similar sites.	5-14
The Forest Service should use roadless areas to study ambient noise on a forest-by-forest	
basis	5-15
The Forest Service should maintain healthy forests through active management of	
roadless areas.	5-15
By considering additional alternatives	
The Forest Service should eliminate timber harvest for "forest health."	
Herbicide and pesticide use should be banned in roadless areas.	
1	

The Forest Service should justify its claim that roadless areas are better able to respond	
to natural disturbances than roaded areas.	5-17
The Final EIS should include an alternative-by-alternative analysis of projected wildfires	
and projected insect and disease concerns.	5-17
The Forest Service should use active management to control invasive weeds and disease	
vectors	5-18
To prevent blister rust	
The Forest Service should mitigate the spread of weeds	
The Forest Service should address how disease surveys will be conducted after	
implementation of the proposed rule.	5-18
The Forest Service should manage humans to mitigate disturbance of native species	
The Forest Service should consider the influence of roadless areas on the spread of	
invasive plant species	5-19
They prevent spread of weeds	
They have no effect on the spread of weeds	
The Forest Service should address the role roads and trails play in the introduction and	
spread of noxious weeds.	5-19
By roads	. 5-20
By vehicles	. 5-20
The Forest Service should not assume that limiting roads will curtail the spread of insect	
and disease infestations	5-21
The Forest Service should analyze the risk of insects and disease in each roadless area	5-21
The Forest Service should retain fire access roads.	5-21
For public safety	
To reduce the need for bulldozer firebreaks	. 5-22
The criteria for fire management should be based on the needs of each roadless area	5-22
Slash from timber harvest operations should be removed to reduce fire danger	5-22
The Forest Service should ban grazing in order to reduce the effects of fires	5-22
The Forest Service should reevaluate its discussion on page 3-22 of the Draft EIS	
regarding the effects of the proposed rule on the occurrence of wildfires	5-23
The Forest Service should complete a site-specific analysis of fire risk in roadless areas	5-23
The Forest Service should consider the importance of roadless areas for protecting	
biodiversity	
Providing medicines, food and other resources	. 5-24
The Forest Service should provide stronger protection for biodiversity than is proposed	
in the DEIS and the "Preferred Alternative."	5-24
The Forest Service should adopt Alternative 4 because it has the most substantial	
benefits for biological diversity.	5-25
The Forest Service should apply a landscape/ecoregion approach to biodiversity	
protection.	5-25
Road construction in roadless areas should be restricted only where necessary to	
preserve biodiversity	5-25
The Forest Service should evaluate the effects of roadlessness on biodiversity	5-25
Roads benefit biodiversity	
Roads negatively effect biodiversity	
The Forest Service should conserve non-renewable landscapes	5-26

The Forest Service should reconsider actively managing for specific successional	
stages	5-26
Early successional stages should not be artificially maintained	5-26
Protect old growth forests	
Protect Tongass old growth	5-27
The Forest Service should consider the role of fire in roadless area vegetation	
management.	5-27
The Forest Service should manage forests to protect fungi	
The Forest Service should consider the beneficial effects of roads on vegetation	
The Forest Service should protect roadless areas for wildlife.	
Non-game species.	
The Forest Service should avoid focusing on single species management.	5-29
The Forest Service should reconsider preserving roadless areas based on the	
assumption that species are static.	5-29
The Forest Service should ensure that wildlife is not displaced by timber harvest	
operations.	5-29
The Forest Service should prohibit disturbance of wildlife during nesting and	
calving season.	
By instituting seasonal closures for motorized vehicles	
The Forest Service should create Designated Wildlife Refuge Areas	
The Forest Service should maintain buffer zones to protect wildlife diversity	5-30
The Forest Service should provide comprehensive protection to wildlife populations	
on the Tongass National Forest	5-30
The Forest Service should explain whether the roadless policy will block roads with	
gates for wildlife management purposes	5-30
The Forest Service should remove elk as an example of species dependent on large	5 21
tracts of roadless areas.	5-31
The Forest Service should use tools such as timber harvesting and controlled burning	5 21
to aid declining elk herds	5-31
The Forest Service should preserve habitat for all birds including migrating neotropicals.	5 21
1	
The proposed rule should ensure protection for the Northern flying squirrel.	
The Forest Service should consider the benefits of active management to wildlife	
Benefits of timber harvest	
Clearcutting Roads	
The Forest Service should evaluate the negative effects of active management	
on wildlife.	5-34
Insecticides on National Forest System Lands	
The Forest Service should address the effects of motorized and off-highway vehicle	
recreation on wildlife.	
No negative effect on wildlife	
Negative effects to wildlife	
The Forest Service should consider that wildlife is not negatively impacted by roads	
The Forest Service should clarify that it is road construction rather than the road	
itself that negatively affects wildlife	5-35

The Forest Service should consider the impacts of trails on wildlife	. 5-35
No negative effects to wildlife	. 5-35
Negative effects to wildlife	. 5-35
The Forest Service should reconsider the comparative effects of hikers and off highway	
vehicles on wildlife	. 5-36
The Forest Service should consider the effect of the proposed rule on hunting revenues	
for wildlife management	
The Forest Service should conduct species-specific inventories of roadless areas	. 5-37
The Forest Service should address the potential increase for vehicle/animal collisions	. 5-37
The Forest Service should demonstrate the connection between poaching and road	
access	. 5-37
The Draft EIS should include an analysis of wildlife implications for early successional	
species	. 5-38
The Forest Service should protect animal habitat by prohibiting timber harvest	. 5-38
The Forest Service should protect roadless areas greater than 1,000 acres but less than	
5,000 acres as critical habitat.	. 5-38
The Forest Service should protect low elevation roadless areas as valuable winter range	. 5-38
The Forest Service should protect roadless areas for wildlife dependent on undisturbed	
habitat	. 5-39
Old growth	. 5-39
Interior forest	. 5-39
The Forest Service should recognize the importance of forests as the principal habitat for	
pollinators	
The Forest Service should allow active management for special exemptions	
Ground bird habitat	5-39
The Forest Service should consider the effects of human encroachment on wildlife's	
e	. 5-40
The Forest Service should reshape roadless areas to mitigate the effects of adjacent	
disturbed areas and maximize interior habitat.	
The final plan should include an analysis of the effects on big game winter range	. 5-40
The Forest Service should compare the effects of roadless areas and managed forest on	
wildlife, using comprehensive wildlife data.	. 5-41
The Forest Service should base any proposed changes to the management of roads in	
roadless areas on the potential site specific effects of roads on habitat	. 5-41
The Forest Service should conduct and support research to provide a better	
understanding of the effects of habitat degradation	
The Forest Service should protect roadless areas for habitat connectivity	
By including smaller interconnecting areas	
By adopting alternative 4	
In the Tongass	5-42
The Forest Service should develop a management plan that assures wildlife corridors	
between key wilderness areas.	
The Forest Service should consider the fragmentation effects of roads.	
Road fragmentation analysis should include federal, state, and county roads	. 5-44
The Forest Service should avoid using grizzly bear recovery potential as a measure	_
of effects of the proposed rule on fragmentation.	. 5-44

The proposed rule should more clearly distinguish between natural and human caused	
fragmentation.	5-44
The Forest Service should use consistent units of measure when addressing	
fragmentation.	5-45
The Forest Service should prohibit road-building to protect aquatic species	
The Forest Service should improve road building practices to protect fish stocks	
By paying timber contractors to repair or close roads	
The Forest Service should protect the aquatic habitat associated with streams draining	
late-successional and old-growth forests.	5-46
The Forest Service should acknowledge that science supports the restoration of habitat	
as the key to the salmon fisheries recovery.	5-46
The Forest Service should maintain roads to improve salmon resources	5-46
The Forest Service should protect the freshwater mussel populations of the Wolf River	
in the Holly Springs National Forest through roadless designation.	5-47
The Forest Service should address the effects of poor forest management on aquatic	
resources.	5-47
The Forest Service should consider the need for roadless areas as threatened and	
endangered species habitat	5-48
On the Tongass National Forest	5-49
Spotted owl	5-49
The Forest Service should reconsider the availability of appropriate Canada lynx habitat	
in roadless areas	5-49
The Forest Service should eliminate roads on national forest to gain wolf habitat	5-50
The Forest Service should allow timber harvest to improve forage in grizzly bear	
habitat	5-50
The Forest Service should reintroduce grizzly bears and wolves into the lower Rockies	
and move cattle back to private ranches.	5-50
The Forest Service should consider the effects of excluding inventoried and	
non-inventoried roadless areas on sensitive, threatened and endangered species	5-50
The Forest Service should analyze the affects of roads on rare snails and the endangered	
Apache trout	5-50
The Forest Service should clarify discrepancies regarding the number of recovery	
projects for threatened and endangered species	5-51
The Forest Service should protect roadless areas in order to mitigate the negative	
effects on watersheds	5-51
The Forest Service should use best management practices to mitigate the effects of	
road building on water and stream quality	
The Forest Service should evaluate the effect of the proposed rule on water yield	5-52
For communities and agricutural use	5-52
The Forest Service should conduct forest management to maintain watershed health	5-52
The Forest Service should prohibit activities that damage watersheds	5-53
Timber harvest	
Until watershed area units can be identified	
Ban cattle and off-highway vehicles	
The Forest Service should allow timber harvest	
Despite past damage to watersheds	
To improve water yield	3-34

The Forest Service should consider the effects roads and road construction have on	
watersheds	. 5-55
Drainage patterns	
Sedimentation	
The Forest Service should address the handling of toxic substances in roadless areas	
The Forest Service should address the effects of log dumps on the marine environment	. 5-56
The Forest Service should consider the effects of agricultural/industrial pollution on	
	. 5-56
The Forest Service should consider the importance of roadless areas as sources of clean	
drinking water	
Roadless areas are important	
Roadless areas are not important	
The Forest Service should consider the importance of forests for water retention	. 5-57
The Forest Service should address the effects of the proposed action on the access to	
water resources	. 5-58
The Forest Service should address the effect of the proposed rule on the ability of local	
authorities to address problems associated with the Total Daily Maximum Load	. 5-58
The Forest Service should revise sections of the proposed rule dealing with water	
resources to include recent scientific information.	. 5-58
The Forest Service should indicate where impaired watersheds are located in relationship	
to roadless areas.	. 5-58
The Cumulative Effects Analysis for water quality should include an assessment of	
forestry practices and other actions conducted on private inholdings and adjacent	
	5 50
lands	. 5-59
The Forest Service should not manage lands on steep slopes or with poor and	
The Forest Service should not manage lands on steep slopes or with poor and erosive soil.	. 5-59
The Forest Service should not manage lands on steep slopes or with poor and erosive soil The Forest Service should protect unique geologic formations	. 5-59 . 5-60
The Forest Service should not manage lands on steep slopes or with poor and erosive soil.The Forest Service should protect unique geologic formations.The Forest Service should consider the effects of certain activities on soil erosion.	. 5-59 . 5-60 . 5-61
 The Forest Service should not manage lands on steep slopes or with poor and erosive soil. The Forest Service should protect unique geologic formations. The Forest Service should consider the effects of certain activities on soil erosion. Roads and road construction cause erosion. 	. 5-59 . 5-60 . 5-61 5-61
The Forest Service should not manage lands on steep slopes or with poor and erosive soil. The Forest Service should protect unique geologic formations The Forest Service should consider the effects of certain activities on soil erosion. Roads and road construction cause erosion	. 5-59 . 5-60 . 5-61 5-61 5-61
 The Forest Service should not manage lands on steep slopes or with poor and erosive soil. The Forest Service should protect unique geologic formations. The Forest Service should consider the effects of certain activities on soil erosion. Roads and road construction cause erosion. Off-highway vehicles increase erosion. Erosion is natural 	. 5-59 . 5-60 . 5-61 5-61 5-61 5-61
 The Forest Service should not manage lands on steep slopes or with poor and erosive soil. The Forest Service should protect unique geologic formations. The Forest Service should consider the effects of certain activities on soil erosion. Roads and road construction cause erosion. Off-highway vehicles increase erosion Erosion is natural The Forest Service should consider that road construction will introduce soil bacteria 	. 5-59 . 5-60 . 5-61 5-61 5-61 5-61 . 5-61
 The Forest Service should not manage lands on steep slopes or with poor and erosive soil. The Forest Service should protect unique geologic formations. The Forest Service should consider the effects of certain activities on soil erosion. Roads and road construction cause erosion. Off-highway vehicles increase erosion. Erosion is natural . The Forest Service should consider that road construction will introduce soil bacteria. The Forest Service should address the potential for fire induced soil erosion. 	. 5-59 . 5-60 . 5-61 5-61 5-61 . 5-61 . 5-61 . 5-62
 The Forest Service should not manage lands on steep slopes or with poor and erosive soil. The Forest Service should protect unique geologic formations. The Forest Service should consider the effects of certain activities on soil erosion. Roads and road construction cause erosion. Off-highway vehicles increase erosion. Erosion is natural The Forest Service should consider that road construction will introduce soil bacteria. The Forest Service should address the potential for fire induced soil erosion. The Forest Service should verify the primary contributor to erosion in the forest. 	. 5-59 . 5-60 . 5-61 5-61 5-61 . 5-61 . 5-62 . 5-62
 The Forest Service should not manage lands on steep slopes or with poor and erosive soil. The Forest Service should protect unique geologic formations. The Forest Service should consider the effects of certain activities on soil erosion. Roads and road construction cause erosion. Off-highway vehicles increase erosion. Erosion is natural The Forest Service should consider that road construction will introduce soil bacteria. The Forest Service should address the potential for fire induced soil erosion. The Forest Service should verify the primary contributor to erosion in the forest. The landslide risk map on page 3-37 of the Draft EIS should be updated. 	. 5-59 . 5-60 . 5-61 5-61 5-61 . 5-61 . 5-62 . 5-62
 The Forest Service should not manage lands on steep slopes or with poor and erosive soil. The Forest Service should protect unique geologic formations. The Forest Service should consider the effects of certain activities on soil erosion. Roads and road construction cause erosion. Off-highway vehicles increase erosion. Erosion is natural The Forest Service should consider that road construction will introduce soil bacteria. The Forest Service should address the potential for fire induced soil erosion. The Forest Service should verify the primary contributor to erosion in the forest. The landslide risk map on page 3-37 of the Draft EIS should be updated. The Forest Service should analyze the geologic hazard mitigation opportunities that 	. 5-59 . 5-60 . 5-61 5-61 5-61 . 5-61 . 5-62 . 5-62 . 5-63
 The Forest Service should not manage lands on steep slopes or with poor and erosive soil. The Forest Service should protect unique geologic formations. The Forest Service should consider the effects of certain activities on soil erosion. Roads and road construction cause erosion. Off-highway vehicles increase erosion. Erosion is natural The Forest Service should consider that road construction will introduce soil bacteria. The Forest Service should address the potential for fire induced soil erosion. The Forest Service should verify the primary contributor to erosion in the forest. The landslide risk map on page 3-37 of the Draft EIS should be updated. The Forest Service should analyze the geologic hazard mitigation opportunities that will be lost if the proposed rule is implemented. 	. 5-59 . 5-60 . 5-61 5-61 5-61 . 5-61 . 5-62 . 5-62 . 5-63
 The Forest Service should not manage lands on steep slopes or with poor and erosive soil. The Forest Service should protect unique geologic formations. The Forest Service should consider the effects of certain activities on soil erosion. Roads and road construction cause erosion. Off-highway vehicles increase erosion. Erosion is natural The Forest Service should consider that road construction will introduce soil bacteria. The Forest Service should address the potential for fire induced soil erosion. The Forest Service should verify the primary contributor to erosion in the forest. The landslide risk map on page 3-37 of the Draft EIS should be updated. The Forest Service should analyze the geologic hazard mitigation opportunities that will be lost if the proposed rule is implemented. The Forest Service should explain how air quality can be better in roadless areas as 	. 5-59 . 5-60 . 5-61 5-61 5-61 . 5-61 . 5-62 . 5-63 . 5-63
 The Forest Service should not manage lands on steep slopes or with poor and erosive soil. The Forest Service should protect unique geologic formations. The Forest Service should consider the effects of certain activities on soil erosion. Roads and road construction cause erosion. Off-highway vehicles increase erosion. Off-highway vehicles increase erosion. Erosion is natural. The Forest Service should consider that road construction will introduce soil bacteria. The Forest Service should address the potential for fire induced soil erosion. The Forest Service should verify the primary contributor to erosion in the forest. The landslide risk map on page 3-37 of the Draft EIS should be updated. The Forest Service should analyze the geologic hazard mitigation opportunities that will be lost if the proposed rule is implemented. The Forest Service should explain how air quality can be better in roadless areas as compared to managed areas. 	.5-59 .5-60 .5-61 5-61 5-61 .5-61 .5-62 .5-62 .5-63
 The Forest Service should not manage lands on steep slopes or with poor and erosive soil. The Forest Service should protect unique geologic formations. The Forest Service should consider the effects of certain activities on soil erosion. Roads and road construction cause erosion. Off-highway vehicles increase erosion. Erosion is natural. The Forest Service should consider that road construction will introduce soil bacteria. The Forest Service should address the potential for fire induced soil erosion. The Forest Service should verify the primary contributor to erosion in the forest. The landslide risk map on page 3-37 of the Draft EIS should be updated. The Forest Service should analyze the geologic hazard mitigation opportunities that will be lost if the proposed rule is implemented. The Forest Service should explain how air quality can be better in roadless areas as compared to managed areas. The Forest Service should define where Class 1 air quality areas are in relation to 	. 5-59 . 5-60 . 5-61 5-61 . 5-61 . 5-61 . 5-62 . 5-62 . 5-63 . 5-63 . 5-64
 The Forest Service should not manage lands on steep slopes or with poor and erosive soil. The Forest Service should protect unique geologic formations. The Forest Service should consider the effects of certain activities on soil erosion. Roads and road construction cause erosion. Off-highway vehicles increase erosion. Erosion is natural. The Forest Service should consider that road construction will introduce soil bacteria. The Forest Service should address the potential for fire induced soil erosion. The Forest Service should verify the primary contributor to erosion in the forest. The landslide risk map on page 3-37 of the Draft EIS should be updated. The Forest Service should analyze the geologic hazard mitigation opportunities that will be lost if the proposed rule is implemented. The Forest Service should explain how air quality can be better in roadless areas as compared to managed areas. The Forest Service should define where Class 1 air quality areas are in relation to National Forest System Lands. 	. 5-59 . 5-60 . 5-61 5-61 . 5-61 . 5-61 . 5-62 . 5-62 . 5-63 . 5-63 . 5-64
 The Forest Service should not manage lands on steep slopes or with poor and erosive soil. The Forest Service should protect unique geologic formations. The Forest Service should consider the effects of certain activities on soil erosion. Roads and road construction cause erosion. Off-highway vehicles increase erosion. Erosion is natural. The Forest Service should consider that road construction will introduce soil bacteria. The Forest Service should address the potential for fire induced soil erosion. The Forest Service should verify the primary contributor to erosion in the forest. The landslide risk map on page 3-37 of the Draft EIS should be updated. The Forest Service should analyze the geologic hazard mitigation opportunities that will be lost if the proposed rule is implemented. The Forest Service should define where Class 1 air quality areas are in relation to National Forest System Lands. The Forest Service should not preclude adoption of Alternative 1 because of changes 	.5-59 .5-60 .5-61 5-61 .5-61 .5-61 .5-62 .5-63 .5-63 .5-63 .5-64
 The Forest Service should not manage lands on steep slopes or with poor and erosive soil. The Forest Service should protect unique geologic formations. The Forest Service should consider the effects of certain activities on soil erosion. Roads and road construction cause erosion. Off-highway vehicles increase erosion. Off-highway vehicles increase erosion. Erosion is natural. The Forest Service should consider that road construction will introduce soil bacteria. The Forest Service should address the potential for fire induced soil erosion. The Forest Service should verify the primary contributor to erosion in the forest. The landslide risk map on page 3-37 of the Draft EIS should be updated. The Forest Service should analyze the geologic hazard mitigation opportunities that will be lost if the proposed rule is implemented. The Forest Service should explain how air quality can be better in roadless areas as compared to managed areas. The Forest Service should define where Class 1 air quality areas are in relation to National Forest System Lands. The Forest Service should not preclude adoption of Alternative 1 because of changes in air quality. 	.5-59 .5-60 .5-61 5-61 .5-61 .5-61 .5-62 .5-63 .5-63 .5-63 .5-64
 The Forest Service should not manage lands on steep slopes or with poor and erosive soil. The Forest Service should protect unique geologic formations. The Forest Service should consider the effects of certain activities on soil erosion. Off-highway vehicles increase erosion. Off-highway vehicles increase erosion. Erosion is natural . The Forest Service should consider that road construction will introduce soil bacteria. The Forest Service should address the potential for fire induced soil erosion. The Forest Service should verify the primary contributor to erosion in the forest. The Forest Service should analyze the geologic hazard mitigation opportunities that will be lost if the proposed rule is implemented. The Forest Service should define where Class 1 air quality areas are in relation to National Forest System Lands. The Forest Service should not preclude adoption of Alternative 1 because of changes in air quality. 	.5-59 .5-60 .5-61 5-61 .5-61 .5-62 .5-62 .5-63 .5-63 .5-64 .5-64
 The Forest Service should not manage lands on steep slopes or with poor and erosive soil. The Forest Service should protect unique geologic formations. The Forest Service should consider the effects of certain activities on soil erosion. Roads and road construction cause erosion. Off-highway vehicles increase erosion. Erosion is natural. The Forest Service should consider that road construction will introduce soil bacteria. The Forest Service should address the potential for fire induced soil erosion. The Forest Service should verify the primary contributor to erosion in the forest. The Forest Service should analyze the geologic hazard mitigation opportunities that will be lost if the proposed rule is implemented. The Forest Service should define where Class 1 air quality areas are in relation to National Forest System Lands. The Forest Service should not preclude adoption of Alternative 1 because of changes in air quality. The Forest Service should evaluate the role of anthropogenic activities on carbon dioxide exchange. 	.5-59 .5-60 .5-61 5-61 .5-61 .5-61 .5-62 .5-63 .5-63 .5-63 .5-64
 The Forest Service should not manage lands on steep slopes or with poor and erosive soil. The Forest Service should protect unique geologic formations. The Forest Service should consider the effects of certain activities on soil erosion. Off-highway vehicles increase erosion. Off-highway vehicles increase erosion. Erosion is natural . The Forest Service should consider that road construction will introduce soil bacteria. The Forest Service should address the potential for fire induced soil erosion. The Forest Service should verify the primary contributor to erosion in the forest. The Forest Service should analyze the geologic hazard mitigation opportunities that will be lost if the proposed rule is implemented. The Forest Service should define where Class 1 air quality areas are in relation to National Forest System Lands. The Forest Service should not preclude adoption of Alternative 1 because of changes in air quality. 	.5-59 .5-60 .5-61 5-61 .5-61 .5-62 .5-63 .5-63 .5-64 .5-64 .5-64

The Forest Service should clarify whether citizens have the right to treat federal lands	
as their private property.	6-2
The Forest Service should focus management on achievement of a fair balance of uses while minimizing damage to the environment	6-3
The Forest Service should restrict all commercial and recreational activities that threaten the health and integrity of the ecosystem	
The Forest Service should increase restrictions on companies that extract natural	05
resources from roadless areas to encourage greater efficiency	6-4
Best management practices for timber harvest, road construction, and mining should be	
consistently implemented and evaluated for effectiveness.	6-5
The Forest Service should include the Tongass National Forest in logging and road	
building restrictions to prevent irremediable damage to soils, wildlife, and the	
tourism and subsistence economies which depend upon them	6-5
The Forest Service should refocus forest travelway system management on the needs	of
all users rather than those of the commercial timber industry	6-7
Non-timber forest products industry	6-7
Recreational users	6-7
The Forest Service should streamline the road system by maintaining arterial roads	
while closing smaller peripheral routes and logging roads	6-8
The Forest Service should reduce road densities on a forest-by-forest basis through the	
forest planning process	6-8
Collaboratively develop strategic travel management plans	6-8
The Forest Service should not classify currently unclassified roads.	6-8
The Forest Service should provide management direction for "Public Roads."	6-9

The Forest Service should enumerate and quantify the foreseeable impacts of road	
system management on roadless ecosystems	
Existing road system	
Road construction and reconstruction, general	
Cumulative effects of road construction in Alaska	6-10
The final EIS should identify all projects affected by the road building moratorium and	
better elaborate on the need for the proposed rule	
The Forest Service should base its effects analysis on the impacts of temporary rather than	
permanent roads.	.6-10
The Forest Service should implement the proposed prohibition on road construction and	
reconstruction	
The Forest Service should prohibit road construction and reconstruction in all portions of	
inventoried roadless areas, including the "roaded" portions.	.6-12
The Forest Service should end road building to prevent adverse impacts to the ecosystem	
caused by greater public access.	
Increased poaching of plants and wildlife	6-13
The Forest Service should demonstrate the connection between poaching and road	
access.	
The Forest Service should open existing roads rather build new roads	.6-14
The final rule should assure no net gain of road miles by requiring removal of equal road	
mileage for every special exemption.	.6-14
The Forest Service should halt reconstruction on the Loop Road in Fremont County,	
Wyoming	.6-14
The final rule should allow stabilization but not full reconstruction of badly deteriorated	
roads	
The Forest Service should not allow temporary roads to be built	.6-14
The Forest Service should allow temporary roads for timber harvest as long as they are	
promptly closed	.6-15
Roads associated with timber harvest projects should be built to minimum standards,	
restored to natural conditions upon completion of the project, and paid for by the	
timber purchaser	
The Forest Service should allow temporary roads for salvage harvest	. 6-15
The Forest Service should reassess the assumption in the Draft EIS that logging roads	
built into a roadless areas would remain open to the public	.6-15
Roads built for logging and maintenance should be made off limits to the general	
public by means of barriers and gates	.6-16
Stringent road building standards need to be implemented to protect salmon fisheries	
and the fishing industry	. 6-16
Funding should be linked in any timber sale plan to safeguard stricter road building	
standards.	.6-16
The Forest Service should explain how best management practices for road construction	
minimize environmental impacts.	.6-16
The Forest Service should consider the use of plastic culverts for road projects	
The Forest Service should clarify whether the final rule will prohibit road maintenance in	
inventoried roadless areas.	
The Forest Service should revise guidelines for maintenance and reconstruction	
to ensure that existing roads are preserved in useful condition.	. 6-17

The Forest Service should delete the reference to road maintenance on page 1-4	
of the Draft EIS or address maintenance as part of an alternative.	. 6-17
The Forest Service should consider road construction and road reconstruction	
separately.	. 6-17
The Forest Service should reconsider the buffer width between existing roads and	
roadless areas.	. 6-17
Road buffers should be clearly defined and ecologically justified by the Forest Service	
The Forest Service should clarify whether there will be a setback between roadless areas	
and adjacent state highways that would allow for road reconstruction.	. 6-18
The final rule should permit road construction, realignment, and reconstruction of	
federal and state highway systems.	. 6-18
The final rule should be consistent with commitments made in the Environmental	
Streamlining National Memorandum of Understanding regarding expedited highway	
and transit projects.	. 6-20
The Forest Service should limit exceptions for road construction in the proposed rule	. 6-20
The Forest Service should narrow the exception language for catastrophic fire	
Require inholders to take responsibility for fireproofing property	. 6-21
The final rule should narrow the exemption language for protection of property to	
"constructed property."	. 6-21
Rather than authorizing the removal of hazard trees in the exemption for public safety,	
the final rule should include guidelines for alternative hazard management strategies	. 6-22
The Forest Service should relax the exemption for public health and safety	. 6-22
The Forest Service should insert "A road is needed to carry out the multiple uses	
provided for in the authorities cited for these regulations" following	
Section 294.12(b)(4) of the Draft EIS	. 6-22
The Forest Service should consider broadening exceptions in the final rule to include	
special use permits for scientific research projects	. 6-23
Any exceptions made in the proposed rule should be subjected to the proper National	
Environmental Policy Act analysis process and independent scientific review	. 6-23
While the proposed rule claims to ban only new roads, the Forest Service should	
clarify whether it would lead to closure of existing roads and trails.	. 6-24
The Forest Service should report the rate of current road decommissioning and the	
effects of the rule in the Final EIS.	. 6-25
The Forest Service should assure no net loss of road and trail miles.	
The Forest System should maintain access to the road system for search and rescue	
The Forest Service should permanently close roads not essential to forest maintenance	. 6-26
The Forest Service should install physical barriers on many existing roads to minimize	
environmental damage from vehicular access.	
The Forest Service should convert decommissioned roads to non-motorized trails.	. 6-26
The Forest Service should give priority to closing private roads which extend into	< 07
the national forests but which are not accessible to the public	.6-27
The final rule should restore inventoried roadless areas by decommissioning roads and	< 2 7
returning these areas to their unroaded conditions.	
The Forest Service should pursue the decommissioning of specific roads.	. 0-27
The Forest Service should not decommission roads	. 0-28

The Forest Service should reconsider the methods used to decommission roads	. 6-28
Do not cover roads with cut brush	. 6-28
Repair tank traps	
Reseed or abandon rather than recontour	
Remove asphalt pavement on decommissioned roads	. 6-28
The process of closing or decommissioning roads can be more environmentally	
destructive than the presence of roads.	
The Forest Service should convert existing roads to trails rather than eliminate them	. 6-29
The Forest Service should clarify whether the proposed rule would affect new trail	
construction and maintenance	. 6-30
The proposed rule should not be implemented because it bans most "ground disturbing	
activities" which will preclude necessary trail maintenance and construction	. 6-30
The Forest Service should avoid building trails in roadless areas.	6-30
The final rule should prohibit the construction of new motorized trails in roadless areas	. 6-30
The final rule should replace the phrase "of any size" with language limiting trail size in	
inventoried roadless areas to U.S. Forest Service pack and saddle standards unless	
otherwise authorized in the forest plan.	.6-31
The Forest Service should increase the number of hiking trails in roadless areas.	
The final rule should allow construction of trails for mechanized and motorized users	
The Forest Service should not use the threat of lawsuits to limit trail building	
When the roadless areas are created, any nearby trails that are partially on county roads	
should be rerouted through the roadless area	6-31
The Forest Service should maintain rather than close damaged motorized trails	
The Forest Service should clarify whether ATV trails will be considered roadless and	
ATVs banned.	6-32
The Forest Service should decommission illegally established roads in inventoried	.0.52
roadless areas.	6-33
The Forest Service should close all unauthorized or unofficial roads to all forms of	.0 55
motorized travel.	6-33
The Forest Service should prevent dirtbikes and all-terrain vehicles from converting	.0-55
trails into all-terrain vehicle roads.	6-33
The Forest Service should not encourage the creation of illegal trails by incorporating	.0-55
them into the official trail system.	6 33
The Forest Service should prevent Illegal trail development by maintaining existing	. 0-33
	6.24
trails and creating more trails	. 0-34
The Forest Service should address how it will meet its obligation to "furnish a	6.20
continuous supply of timber for the use of U.S. citizens."	
The proposed rule will place greater demands on international timber resources	. 6-36
The proposed rule will not reduce overall logging levels on public forests because	< 0 7
timber extraction quotas will be made up from different areas of the national forests	
Explicitly include this outcome in an alternative	. 6-37
The Forest Service should institute a policy to encourage the public to reduce the	< 0 7
consumption of forest resources.	.6-37
Consumers should be taxed on the purchase of nonrenewable resources to aid in	
lowering the consumption of these resources.	. 6-37
The Forest Service should the No Action Alternative because we do not know what	
society will need in the future	. 6-37

The Forest Service should end timber harvest in roadless areas because private	
timberlands can adequately supply the nation's wood product needs.	6-38
The Forest Service should acknowledge that current timber harvest methods do not	
result in the destructive effects of past practices.	6-38
The Forest Service should end logging in the national forests	
End logging in the Prescott National Forest	
The Forest Service should assure the final rule restricts timber harvest to a much	
greater degree than in the Preferred Alternative.	6-39
The Preferred Alternative does not meet President Clinton's mandate	
The Forest Service should restrict timber harvest in roadless areas because past levels	
are clearly unsustainable	6-39
The final rule should prohibit logging in roadless areas	6-39
Buffer wilderness areas	
Focus on second-growth stands in roaded areas to meet timber harvest needs	. 6-40
The Forest Service should allow timber harvest in roadless areas because second	
growth in roaded areas will not be harvestable for decades	6-40
The final rule should prohibit harvest of old growth forests.	6-41
Halt logging of any stand of trees 200 years or older and greater than 10 acres	. 6-41
The Forest Service should preserve the remaining intact forests from harvest because	
replanted tree monocultures are an inadequate replacement.	6-41
The final rule should not allow timber harvesting on the Tongass National Forest due to	
unacceptable impacts	6-42
The Forest Service should reassess the exception made in Alternative 3 for timber	
harvest for stewardship purposes	6-42
Alternative 3 should not allow an exception for the salvage removal of fallen and dead	
timber	6-42
The Forest Service should stop all logging projects being planned in roadless areas	6-42
The Forest Service should address whether additional timber harvest will occur after	
the year 2004	6-42
The Forest Service should discontinue giving Plum Creek Corporation timber credits	6-43
The Forest Service should continue active timber management on Forest System lands	6-43
The Forest Service should allow roads for timber management within the National Forest	
System lands.	6-43
The Forest Service should not adopt the proposed rule inasmuch as it is just an excuse	
for the fact that national forests have failed to meet their own set targets for timber	
production within existing forest plans	6-44
The Forest Service should not set aside any matrix forest as unroaded under the	
proposed rule	6-44
The Forest Service should keep its promise to Minnesota residents regarding timber	
cutting outside the Boundary Waters Canoe Area.	6-44
The Forest Service should mandate the use of better management practices for timber	
harvest	6-45
Improve slash management	
The Forest Service prohibit clearcutting	

The Forest Service should use alternative timber removal methods to minimize	
environmental damage	6-46
Log over snow	
Log with horses	
The Forest Service should address the effective range of harvester/forwarders	6-46
The proposed rule should protect areas from the creation of skid trails by forwarders	
and other mechanical harvesting equipment	6-46
Helicopter logging should be allowed.	
Only where scientifically supported for harvest of dead or diseased trees	. 6-47
The Forest Service should not allow helicopter or cable logging because of negative	
impacts on flora, fauna, and fire hazard in roadless areas.	6-47
The rule should clearly state that if the trees can't be replaced within 25 to 30 years	
maximum, then they should not be cut or considered a legitimate harvest.	6-47
The Forest Service should require that timber contactors replant twice the harvested	
acreage	6-48
Reforesting should be carried out with more than one species of tree.	6-48
The Forest Service should explain how timber management alters the character of a	
roadless area	6-49
The Forest Service should disclose the effects of the proposed rule on the mix of	
	6-49
The Final EIS should include an analysis of logging levels by volume and elevation	
classes to present a more appropriately scaled analysis of the potential benefits of	
	6-49
The Forest Service should address the effects on timber harvest levels of specific	
	6-50
The Forest Service should correct claims of decreased clearcutting in the Draft EIS by	
including the amount of all even-aged harvest methods	6-50
The Forest Service should address the expansion of timber harvest units to increase	
volume output in the Tongass and whether an EIS must be completed for this	6-50
The Forest Service should provide current baseline timber harvesting information	
The Forest Service should conduct a quantitative analysis of suitable timber base in	001
roadless areas and effects of the rule on timber sale volumes.	6-51
The Forest Service should address the effects of the proposed rule on allowable sale	001
quantities and timber suitability outside of roadless areas	6-52
The Forest Service should consider whether the proposed rule will restrict effective	002
access for forest management activities	6-54
The Forest Service should permit timber harvest in roadless areas for forest health	
Timber should be harvested rather than left to burn or be destroyed by insects and disease	
Allow road building for stewardship harvest	
The Forest Service should use management practices to remove or thin trees/fuel	
before fire occurs.	6-56
Only in urban interface areas	
The Forest Service should address whether natural processes, such as fire, are far more	
destructive than logging.	6-57
The Forest Service should not build new roads because existing roads provide adequate	
access for management activities	6-57
The Forest Service should focus management efforts on restoration	
0	

The Forest Service should define what it means by restoration forestry and determine	
the most appropriate lands for treatment6-	-58
In consultation with independent scientists	5-58
The final rule should permit stewardship timber harvest only to restore natural forest	
structure and composition6-	-59
The final rule should assure that stewardship timber harvest is not standard commercial	
harvest under another name6-	
Ban all timber harvest in roadless areas	5-60
The Forest Service should establish criteria to identify forest health conditions that would	
require entry into roadless areas	-60
The Forest Service should allow thinning of undergrowth in roadless areas if there is a	
protocol for the maximum diameter of stems and trunks that will be removed	
Restrict logging to trees eight inches in diameter or less	5-60
The Forest Service should reevaluate and scientifically justify the claim that	
Alternative 3 will have fewer local negative effects than Alternative 4 due to	
benefits from stewardship logging	-61
The Forest Service should award experimental contracts for stewardship timber harvest	
and contract any commercially valuable timber separately	-61
In order to reduce fuel loads and achieve a healthier balance of flora, the Forest Service	
should provide funding for meeting stewardship objectives independent of the	
economic value of the timber that needs to be removed	
The Forest Service should allow natural processes to predominate in wild forests	-62
The final rule should eliminate the exception for salvage logging after catastrophic	
events	
The final rule should permit salvage logging.	-63
The Forest Service should describe the effects each alternative would have on fire	C 1
suppression tactics	-04
The Forest Service should adequately plan, fund, and carry out management techniques	
that will progressively rid the areas involved of the fire hazard due to dead fuel accumulations	65
The Forest Service should develop plans for managing catastrophic fire situations in	-03
roadless areas	65
The Forest Service should not compromise wildland firefighters' safety by lack of roads 6-	
The Forest Service should not compromise windiand menginers' safety by lack of roads 6- The Forest Service should be pro-active by building roads to reduce fire risk	
Road maintenance for emergency access should be limited to buffer area firebreaks	
The Forest Service should not build roads into roadless areas for fire control	
Fire management should not be used as an excuse for road construction or logging	
Timber harvest, through its effects on forest structure, local microclimate, and fuel	00
accumulation, has dramatically increased fire severity and thus the Forest Service	
should reject commercial timber harvest for fire reduction	-67
Given the changes in forest structure and increased catastrophic fire hazard caused by	07
cattle grazing, the Forest Service should prohibit this activity in roadless areas	
targeted for fireproofing treatments	-68
The Forest Service should encourage grazing in order to reduce the likelihood fires	
The Forest Service should encourage grazing in order to reduce the incentiood inestimated. The Forest Service should reassess the assertion that fire hazard is greater in roaded	50
areas than it is in roadless areas	-68
The Forest Service should consider implementing prescribed burns	
r · · · · · · · · · · · · · · · · · · ·	

The Forest Service should balance use of prescribed burns and timber harvest	6-69
The Forest Service should harvest timber to control stocking levels before fire can be introduced.	6-69
The Forest Service should redefine and narrow the parameters for the use of controlled	
burning	6-70
Government agencies should implement a moratorium on prescribed burns	
The final rule should provide detailed analysis of its effects on grazing allotments	
The roadless area rule should not interfere with access to range facilities and stock	
animals.	6-71
The Forest Service should address the issue of whether livestock grazing should be	
permitted in roadless areas	
Allow livestock grazing	
Restrict or prohibit livestock grazing	6-72
Decisions about grazing and grazing permits should be made at a national level, not	
left for local managers to decide	6-72
The Forest Service should place limits on grazing such as reducing herd size and protecting riparian areas.	6-73
The Forest Service should not allow cattle grazing in riparian areas or in areas	0 75
above 3,000 feet in elevation, and should severely limit grazing below 3,000 feet	6-73
The Forest Service should not pay hunters to kill animals to make the public lands	0-75
	6 72
······································	0-75
The Forest Service should provide baseline information on leasable minerals, geology,	C 75
and hard rock minerals currently found on National Forest System lands	6-73
The Forest Service should analyze in detail mineral resources and possible restrictions	
the proposed rule may impose on their development.	
Palladium/platinum mineral resources in the Stillwater Complex	
Coal deposits in the Cow Creek Buttes roadless area	
Existing coal leases overlapping inventoried roadless areas in Utah	
Mineral resources in Sky Lakes B roadless area	. 6-79
The Forest Service should conduct inventories for the occurrence of mineral deposits	< 70
before designating roadless areas	6-79
The Forest Service should insert "(10) Commodity resource supply potential" following	< - 0
Section 294.13(a)(9) in the Draft EIS.	6-79
The final EIS should specify the anticipated delay for processing road construction	
applications for mineral development while unroaded areas are being inventoried	6-79
The Final Rule should specify that all reasonable alternatives to entry must be	
considered prior to exceptions for CERCLA (Comprehensive Environmental	
Response, Compensation and Liability Act) projects	6-80
The Forest Service should explain why conserving roadless characteristics increases the	
number of areas recommended for mineral withdrawal.	6-80
Roadless areas should remain open to roadbuilding for mineral exploration and	
development activities.	6-80
The Forest Service should clarify procedures to determine what is "considered reasonable	0 00
and necessary" to develop a lease and how that determination will be made	6-81
The Forest Service should not require mineral leaseholders with "valid existing rights"	5.01
to prepare an environmental impact statement for mining exploration and	
development	6.91
development	0-01

The Forest Service should assure that the final rule will not restrict existing mineral	
leases such that lessees will require federal reimbursement for leasing fees	. 6-81
The final rule should restrict mineral development in roadless areas due to unacceptable	
human and environmental health risks.	
The Forest Service should limit access to mining claims in inventoried roadless areas	
to non-motorized methods or helicopters.	. 6-82
The Forest Service should allow only small-scale mining by hand	
The Forest Service should prohibit strip mining	
The Forest Service should not allow recreational placer mining	
The Forest Service should consider all available means of restricting mineral leases,	
including lease expiration and prohibition of communitization agreements.	. 6-83
The Forest Service should utilize its authority to withdraw roadless areas from mineral	
entry.	. 6-83
Modify section 294.13 to require consideration of mineral withdrawal in implementation	
process	6-84
The Forest Service should develop regulations for "grandfathered" mining claims in	
roadless areas.	. 6-84
The Forest Service should purchase all mineral rights on National Forest System lands	
to stop oil and gas and hard rock mining	. 6-84
The Forest Service should protect specific roadless areas from mining activity	. 6-84
The Sand Creek area	6-84
The Forest Service should address whether track-mounted core drills will be allowed to	
travel cross-country in inventoried roadless areas.	. 6-85
The Forest Service should adequately address oil and gas operations in the draft	
proposal	
An exception for leasable mineral development should be allowed in the final rule	
North Dakota Grasslands	
Targhee National Forest	6-86
The Forest Service should consider allowing oil and gas development on a carefully	
controlled basis.	. 6-86
The Forest Service should limit the amount of methane wells allotted on a certain	
amount of acreage.	
Oil and gas development should not be allowed in the national forests	. 6-87
A shortcoming of the Preferred Alternative is that it does not preclude oil and gas	
leasing, but does restrict road access for any new leases in roadless areas.	
The Forest Service should promote alternate sources of energy.	. 6-87
The Forest Service should promote alternative materials as substitutes for traditional	
wood products	. 6-88
Alternative building materials	
The Forest Service should adopt a pro industrial hemp policy	. 6-88
The Forest Service should consider the environmental impacts of increased use of	
alternatives to wood fiber	. 6-89
The Forest Service must develop a cumulative effects section to describe the effects	
on public utility infrastructure	. 6-90
The Forest Service should issue a decision to reroute Collier Hollow Road #2780	
so that utility installation can proceed.	. 6-90

The roadless area rule should not interfere with the building, maintenance, or operation	
of water holding and delivery systems	. 6-90
Allow access for maintenance to protect public health and safety	6-91
The proposed rule should not interfere with the building, maintenance, or operation of	
electrical facilities.	. 6-91
By including utility maintenance in the exception for public health and safety	6-92
The Forest Service should allow access to stream gauges, climate stations, and snow	
survey data sites (SNOTEL).	6-93
The Forest Service should prohibit new human developments and water projects	6-93
The Forest Service should clarify the effects of the final rule on future ski area	
operations	6-94
Ski resort boundaries operated under a current master development plan should be	
	6-95
The Forest Service should exempt ski areas with approved records of decision from the	
The Forest Service should address the fact that the proposed rule will effectively modify	
current Inyo National Forest special use permits in favor of the Mammoth Mountain	
Ski Area.	6-96
The Forest Service should allow the proposed Pelican Butte Ski area to continue to be	.0 70
	6-96
Contrary to the conclusion in the Draft EIS, the Pelican Butte Ski Area would provide	.0-70
more dispersed recreation opportunities than an undeveloped Sky Lakes B	
roadless area.	6-97
The Forest Service should consider whether to exempt the Pelican Butte Ski Area	.0-97
proposal from the final rule	6 07
Exempt Pelican Butte	
Do not exempt Pelican Butte	
The Forest Service should consider whether to exempt Hogback Basin to allow the	0-90
expansion of the White Pass Ski Area.	6 00
Exempt Hogback Basin	
Do Not Exempt Hogback Basin	
The final rule should not create any special exemptions of any kind for new ski area	0 //
construction or expansion of current areas.	6-99
The Forest Service should assure that prohibitions in the final rule cover proposed	.0 //
ski areas that did not have a record of decision signed by October 13, 1999	6-100
The Final EIS should explicitly state that helicopter skiing is a suitable dispersed	0 100
recreational activity in designated roadless areas.	6-100
The final rule should not alter snowcat skiing special use permits without due process	
The Forest Service should address the impacts of the proposed rule on hunting	
The proposed rule will negatively affect hunting	
The proposed rule will positively affect hunting	
The Forest Service should consider the impacts of crowding hunters when access to	0-102
public land is restricted.	6-102
The Forest Service should provide a quantitative analysis of the effects of the	0-102
proposed rule on hunting and fishing use.	6-103
Clarify how this proposal will affect hunting access to lands acquired in the future	
Charry now and proposal will affect hunding access to failus acquired in the future	0-103

The Forest Service should delete the non-game species discussion on page 3-176	
from the hunting and fishing section of the Final EIS.	6-103
Hunting and fishing should be prohibited in roadless areas.	6-103
The Forest Service should address "road hunting" and its impacts on wildlife and the	
environment.	6-104
The Forest Service should allow road building and access to aid hunting activities	6-104
The Forest Service should prohibit road building and stewardship logging in roadless	
areas in order to provide an abundance of wildlife to hunters and sightseers.	6-104
Select Alternative 4	
The Forest Service should address whether research supports the claim that better	
quality hunting and fishing is found in roadless areas	6-105
The final rule should not interfere with current dispersed recreation outputs or the	
ability to continue controlled burns within walk-in turkey hunting areas.	6-105
The proposed rule should allow for state wildlife agencies to perform their	
responsibilities.	
The Forest Service should address the effects of the proposed rule on access to	
non-timber forest products and on rural communities dependent on these products	6-106
The Forest Service should not allow the collection of non-timber forest products	
in roadless areas.	6-106
The Forest Service should allow access for fire wood cutting and gathering.	
Do not limit firewood cutting to within 300 feet of Forest Service roads	
The Forest Service should clarify if municipalities and private companies would be	
required to stop traveling into public lands for gathering of wild seed.	6-107
The Forest Service should protect roadless areas as a source of medicines and of genetic	
diversity for improved agricultural crops.	
The Forest Service should address access to cultural and historical sites.	
Maintain access to avoid adverse effects	
Limit access to prevent discovery and/or damage	
Given that the proximity of a road is the best predictor of whether an archeological site	
will be vandalized, the final rule should protect roadless areas	6-109
By keeping existing road definition	
European cultural artifacts should be valued as much as Native American cultural	
artifacts	6-110
As required by Council on Environmental Quality Regulations, the Forest Service	
should conduct a heritage resources cumulative effects analysis for all alternatives	6-110
The Forest Service should disclose the effects of the final rule on federal agencies'	
ability to fulfill their requirement to inventory all lands for cultural properties	6-110
The Forest Service should comply with the National Historic Preservation Act by	
identifying cultural/historical properties and analyzing what impacts the proposed	
rule may have on them.	6-110
By providing sufficient funding to field archaeologists	
The Final EIS should provide a detailed analysis of the paleontological resources	
that are present in areas proposed for closure	6-111
The Forest Service should allow road access for the excavation and preservation of	
paleontological resources	6-111
The Forest Service should consider that the proposed rule will restrict access for	
recreation	6-113

The Forest Service should consider that the proposed rule will restrict access for the	
elderly, very young, and/or handicapped	6-113
The Forest Service should clearly state that access to National Forest System lands	
means the legal right for a person to simply be present on public land and has	
nothing to do with permitted activities or mode of transportation	6-114
There are more than enough roads to meet the needs of the elderly and handicapped	
and allow them to experience public wildlands.	6-114
The Forest Service should refute the contention that non-motorized activities in	0 11 1
roadless areas are limited to the wealthy, elite, and physically fit	6-114
The public should be allowed to travel on roads that provide access to existing camping	0-11-
and/or recreational areas.	6 1 1 5
The Forest Service should consider a rotation system for open and closed roads	0-113
The Forest Service should limit the use of motorized vehicles to necessary access	C 115
by either authorized agency personnel or handicapped persons on designated routes	
The Forest Service should develop special permits for disabled individuals	
The Forest Service should allow motorized access to only those over 65 years of age	6-116
In some roadless areas the Forest Service should provide senior citizen paths,	
wheelchair access, and short loops for sightseeing	6-116
The Forest Service should make special efforts to provide wilderness opportunities	
for the physically challenged.	
The final rule should allow development of new campgrounds in roadless areas	
Develop remote interior camping sites	
The Forest Service should consider installing additional trailhead or parking areas	
The Forest Service should consider introducing public transportation	6-117
The Forest Service should prohibit low over-flights of aircraft except in case of	
emergency	6-117
The final rule should explicitly guarantee aviation access to existing public use airports	
within designated roadless areas	6-117
The Forest Service should keep existing roads and trails open to public access	6-118
The Forest Service should retain roads for logging in an unmaintained state and open	
to off-road vehicle use.	6-119
The Forest Service should not close unmaintained roads. Unmaintained roads should	
	6-119
If a road is of historical or scenic significance, the Forest Service should not take away	
recreational access.	6-120
The Forest Service should address the impacts of the proposed rule on the status of	
specific roads or trails.	6-120
The proposed rule should include provisions to keep trail and road access open for trail	0 120
dependent competitions.	6-120
Non-motorized	
Motorized	
The Forest Service should reverse its road closure and restriction policy by opening	10 120
gated roads.	6-121
The Forest Service should open blocked roads on National Forest System land in case	5 141
of fire	6-121
The general public should be allowed access to the same public lands as people with	5 121
leases or special use permits.	6-121
icuses of special use permits.	0 121

The Forest Service should not allow guides to take four wheelers or horses on logging	
roads closed to the general public	. 6-121
If a road has already been improved to the status of an "all weather" road, access	
should be granted to the public	.6-122
National forest roadless areas should have hiking trails which are not open to vehicle	
use	. 6-122
The Forest Service should allow continued motorized recreation in national forest	
lands	
It causes no long term damage	6-125
The Forest Service should consider the impacts of vehicle use and the conduct of the	
users on the National Forest System resources.	.6-125
The Forest Service should designate roaded areas that can be sacrificed for	
destruction by off-road vehicle uses.	
set on rotating basis for off-road motorized recreation	6-126
The Forest Service should implement a series of linked trails for off-highway	c 10c
vehicle access	
The proposed rule should restrict motorized recreational use.	
The Forest Service should eliminate off-road travel	
Snowmobile use should be allowed in the national forests.	
Off-trail travel	6-127
The Forest Service should develop continuous trail systems for snowmobilers to	6 1 2 7
minimize illegal entry and reduce safety hazards The Forest Service should clarify whether the Wayne National Forest is slated to be	.0-127
closed to off-road motorized access	6 1 2 7
The Forest Service should allow motorized off-highway vehicle recreation in roadless	.0-127
areas.	6 1 2 7
The final EIS should prohibit off-highway-vehicles in roadless areas.	
The final rule should immediately ban motorized off-road vehicles from roadless	.0-120
areas.	6 1 2 8
Ban watercraft and powerboats	
The Forest Service should ban snowmobiles from roadless areas	
The proposed rule should clearly define how snowmobiling and snowmobile trails	.0 12
will be effected.	6-129
The Forest Service should justify its reasoning for failing to restrict off-highway	
vehicle use in the proposed rule	. 6-130
The Forest Service should incorporate nationwide restrictions on off-highway vehicle	10 100
use into the proposed rule or should initiate a separate rulemaking process to	
regulate such use.	.6-130
The Forest Service should establish clear and permanent guidelines for the use of	
off-highway vehicles on public lands.	.6-131
The management of off-road vehicles should be evaluated on a case-by-case basis	
The Forest Service should divide national forests in half with one side open to	
motorized vehicle use and the other closed to motorized vehicles	. 6-132
The Forest Service should consider a permit system to limit numbers of motor vehicles.	
The Forest Service should limit the hours during which off-road vehicles may operate	
during hunting season.	. 6-132

The Forest Service should require the use of lower-emission off-highway vehicles	. 6-132
By setting reachable goals and mandates for pollution and noise	. 6-133
The Forest Service should place more restrictions on personal watercraft, such as jet skis 133	5 6-
The Forest Service should not limit use of 2-stroke watercraft engines	.6-133
The Forest Service should restrict motorized vehicles to designated routes.	
Off-road vehicles should be allowed only on designated and signed official trails.	
The Forest Service should restrict off-road vehicles to established roads only and	
ban them from trails.	. 6-134
The Forest Service should adopt a "closed unless signed open" policy effective	
	. 6-134
The Forest Service should not develop or implement a nationwide policy of "Closed	
Unless Posted Open" for off-highway vehicles.	. 6-135
The Forest Service should recognize and encourage more volunteer work by the	
off-highway vehicle community in road and trail maintenance.	. 6-135
The Forest Service should require that off-highway vehicle groups adopt and maintain	
trails to standard to prevent closure.	. 6-136
The Forest Service should not maintain roads because recreational users enjoy the	
challenges they provide	. 6-136
Mechanized recreation should be restricted or banned in national forests.	. 6-137
The Forest Service should allow mechanized activities in roadless areas	. 6-137
The Forest Service should consider protecting national forest lands from all but human	
powered recreation activity	. 6-137
Roadless areas should be restricted to foot traffic only	. 6-138
For personal health and environmental benefits	
Equestrian use should be restricted in roadless areas.	. 6-138
Horses should be allowed in roadless areas.	. 6-138
The Forest Service should provide adequate parking space for horse trailers	
at trailheads	. 6-139
The Forest Service should permit sled dog training, sledding, and racing in	
roadless areas.	
The Forest Service should considering restricting all human entry to roadless areas	. 6-140
The Forest Service should protect ecologically sensitive areas from all damaging	
recreational activities.	. 6-140
The final EIS should re-analyze the conclusion that the rule will have a detrimental	
effect on recreation.	
Alternative T1	. 6-142
The Forest Service should provide data to support the claim that roadless designations	< 1.10
will benefit recreation.	. 6-142
The Forest Service should undertake a formal study to determine who is actually	c 140
using the national forests.	6-142
The Forest Service should display a graph illustrating the increasing demand for	c 140
dispersed recreation against the decreasing supply of available land for recreation	. 0-142
The final rule should quantify the usage for each class in the Recreation Opportunity	6 1 1 2
Spectrum.	
The Forest Service should disclose dispersed recreation data.	.0-143

The Interdisciplinary Team should consider addressing the effects of the proposed	
rule on subcategories of the Recreation Opportunity Spectrum.	6-143
Recreational use of public lands should be considered separately from commercial	
uses in the proposed rule	6-143
The Forest Service should consider the population growth trends and implications for	
recreation demand levels.	6-144
The Forest Service should address whether the proposed rule will result in a large	_
recreation land base for a very small segment of the population	6-144
The Forest Service should protect roadless areas for the benefit of dispersed	
non-motorized backcountry recreationists	6-144
The Forest Service should address the issue of crowding of motorized users on	
National Forest System lands	6-145
The Forest Service should address the fact that motorized access is inherently	
incompatible with the very qualities users want to experience	6-146
The Forest Service should address the increasing conflicts between types of	
recreational users.	6-146
The Forest Service should facilitate the use of less utilized roadless resources	6-147
The Forest Service should develop a plan to accommodate displaced off-highway	
vehicle users	6-147
The Draft EIS should include an evaluation of the impact of displaced usage on all	
National Forest System lands	6-147
Natural phenomena cause more environmental damage than human recreational or	
commercial activities, so restricting human activities will not solve these	
environmental problems	6-148
The Forest Service should address whether wildlife are more threatened by foot	
traffic or by motor vehicles	6-148
Foot Traffic	
Motorized vehicles/off-highway vehicles	. 6-148
The Final EIS should include an analysis of the cumulative effects of numerous	
concurrent national and regional planning processes on recreation.	
Motorized	. 6-149
The Forest Service should develop additional alternatives to ensure recreation	
management is carried out within the scope of the proposed rule and Roads	
Management Strategy	6-149
Rather than close areas or restrict use, the Forest Service should educate people about	
protecting the land	6-150
The Forest Service should educate the public about the differences between national	
parks and national forests	6-151
In the event that everything is closed, the Forest Service should issue permits to	
individual users, then hold those individuals accountable for any trash left behind	
or environmental damage done	6-151
The Forest Service should consider off-highway vehicle permits that include a tread	
lightly or similar training course as a mandatory prerequisite for traveling	
The Forest Service should print trail guides for off-road vehicle users	6-152
The Forest Service should place interpreters in the campgrounds of the National Forest	
System	6-152

The Forest Service should post wildlife signs to make the public aware of when they	
are in ecologically sensitive areas.	. 6-152
The Forest Service should enforce off-highway vehicle use restrictions in roadless	
areas.	. 6-152
The Forest Service should provide better monitoring and enforcement to responsibly	
accommodate all users.	. 6-153
Fines should be imposed on off-highway vehicle riders who go off designated trails	. 6-153
The Forest Service should enforce out-of-bounds and illegal snowmobile use	
The Forest Service should only allow motorized recreation in limited areas where	
the agency has sufficient resources to actively enforce regulations.	. 6-153
The Forest Service should adjust personnel work schedules to assure weekend	
patrols for motorized travel enforcement	. 6-153
The licensing of all-terrain vehicles should be encouraged to aid in the enforcement	
of users' illegal actions.	. 6-154
The Forest Service should revise the proposed rules governing Cost Recovery for	
Processing Special Use Applications and Monitoring Compliance with Special Use	
Authorizations	
The final rule should include explicit monitoring and enforcement plans for all	
prohibitions.	. 6-154
The Forest Service should address the unwillingness of local Forest Service staff to	
implement roadless protection.	. 6-154
Forest Service employees do not support this proposed rule	6-155
The Forest Service should assure that the final rule will be consistently implemented	
and enforced	. 6-155
The Forest Service should reevaluate statements concerning the loss of open space as	
a rationale for the proposed rule.	.6-156
The Forest Service should display quantitatively the relationship between urban areas,	
populations, and roadless areas in the United States.	
The Forest Service should address access to public land through private land	. 6-156
The Forest Service should allow homesteading and long-term camping on areas	
thought appropriate by local communities	. 6-157
The Forest Service should consider the effects of the final rule on state trust land	
inholdings	6-157
Make roadless areas adjacent to state trust lands available for mineral leasing	6-159
The Forest Service should address the impacts of proposed rule on access for	
inholders	. 6-159
The Forest Service should acknowledge that easement by necessity doctrine,	
whereby a grantor cannot landlock his grantee, also applies to the federal	c 1 co
government.	.6-160
The Forest Service should allow the construction of private roads in close proximity	c 1 co
to designated roadless areas to minimize environmental damage.	.6-160
The Forest Service should allow access to existing roads and new road construction	
for private property access inasmuch as building alternative route on private land	
would cause greater environmental damage.	.6-161
The Forest Service should consider the positive impacts of the proposed rule on	C 1 C 1
private property values	
The Forest Service should purchase inholdings and acquire more land	.6-162

The Forest Service should address current deficiencies in the evaluation and appraisal	
of proposed land exchanges	6-162
The Forest Service should refrain from selling or trading public forest land for development.	6 162
The Forest Service should exempt lands exchanged under P.L. 105-335 from	0-102
the proposed rule	6-163
The Forest Service should consider the effects of increased noxious weed, disease	
and fire occurrences on adjacent non-National Forest System lands	6-164
The Forest Service should address its potential financial liability for damage to	
non-federal lands	6-164
The Forest Service should consider the transfer of effects of timber harvest to	
non-federal lands which may result from the final rule	6-165
The Forest Service should provide the science, information, and incentive programs necessary for private, state and foreign producers to provide an increased,	
sustainable share of the timber and livestock production in the United States	6-166
The Forest Service should evaluate the value of unlogged and unroaded areas as	
protection for private property from landslides and flood damage	6-166
The Forest Service should address the off-site impacts of expanding wildlife	
populations	6-166

Chapter 7 Social and Economic Considerations7-1

The Forest Service should preserve roadless areas for the non-commodity values	
they provide	7-2
For escape from the urban environment	7-3
For spiritual renewal	
For recreational opportunities	7-4
For scientific study	7-4
For their educational value	7-4
The Forest Service should consider that there are few people who really want solitude or	
are willing to walk to find it	7-5
The Forest Service should not dedicate 60 million roadless acres as a "spiritual and	
psychological resource" for nature worshippers	7-5
Roadless Areas should not be protected as reference areas for research and teaching as	
Research Natural Areas are better for that purpose.	7-5
The Forest Service should explain how much acreage is needed to achieve the	
"good feeling" of knowing that there are roadless areas	7-5
The Forest Service should not allow this proposal to infringe upon historic, traditional,	
and cultural uses	7-6
The proposed rule should allow the Pelican Butte Ski project to continue for the positive	
financial impact it will have on the Klamath Tribe's economic self-sufficiency plan	7_7
The Forest Service should consider the impacts of this proposal on subsistence hunting	
	77
and fishing Restrictions on road maintenance will negatively affect subsistence access	
The Forest Service should address the impacts its decisions will have on the family and	/-0
	70
family recreation.	/-ð

The Forest Service should evaluate the need to conduct multi-cultural studies	7-9
The Forest Service should explain how scenic quality is being addressed	7-9
The Forest Service should address the effects of insect and disease outbreaks and	
catastrophic fires on scenic quality	.7-10
Road building and other forest management activities should be prohibited to preserve	
scenic beauty and aesthetic experiences.	.7-10
The Forest Service should assure that the final rule will benefit future generations	.7-11
Preserve for future generations	
Allow future generations to recreate	. 7-12
The Forest Service should reevaluate its economic analysis of the importance of forest	
resources to the economy	.7-14
The Forest Service should expand its economic analysis to include a quantitative	
assessment of a complete range of forest resources	
The proposed rule skews the economic analysis of reductions in timber harvest	.7-15
Protections for roadless areas should be determined on a site-by-site cost/benefit	
basis during forest planning	
The Forest Service should include economic data from individual counties	.7-15
The Final EIS should display the financial contribution of roaded versus unroaded	
recreation to local economies	
The Forest Service should address the benefit of roadless areas to the national economy	.7-16
Analysis in the proposed rule should be based on sound science, not on economics or the	
desire to avoid litigation	.7-16
The proposed rule should be based on sound, sustainable economics with the future	
in mind, not narrow interests.	.7-16
The Forest Service should complete a thorough cost/benefit analysis for the proposed	
rule as a whole	.7-17
The Forest Service should consider the relative economic worth of recreation in	
relation to resource extraction	.7-17
The Forest Service should reconsider the assertion that substituting recreation income for	
timber harvest can provide superior economic benefits.	.7-18
The Forest Service should encourage environmental protection rather than resource	
extraction because it offers superior economic benefits	.7-19
The Forest Service should better analyze and address the economic effect the proposed	
rule will have on the timber industry and its employees.	.7-22
The Forest Service should institute more analysis of economic impacts on resource	
dependent communities. The proposal will result in a loss of jobs, mostly in small	
communities, and cause hardship for many families	
Maintain status quo so there will not be adverse economic consequences	. 7-25
The Forest Service should consider the impacts on jobs indirectly related to the timber	
industry	.7-26
The Forest Service should recognize that the proposed rule will have minimal	
impacts on timber dependent communities	.7-26
The Forest Service should not use Rural Development funding to mitigate impacts of	
the proposed rule	.7-27
The argument that forest products companies need to turn to value added timber is not	
justified inasmuch as trees are required to produce value added products	.7-27

The Forest Service should analyze the effects of the proposed rule on timber prices and	
housing construction costs	7
The Forest Service should address the cumulative effects of the recently proposed	
rulemaking initiatives on small businesses7-2	7
The Forest Service should reevaluate its analysis and projections regarding employment	
in the timber industry and forest dependent communities	8
Technological advancements in harvest techniques account for job loss in the timber	
industry	0
Foreign export of timber accounts for job loss in the timber industry	0
Cyclical fluctuations in the demand for forest products can account for job losses and mill	
closures	
Timber workers and communities should adapt to a changing job market	0
Roadless areas attract a highly motivated, well-educated work force, and provide new and	_
innovative technological and communication based jobs	
Unemployment is at an all time low and workers can easily relocate	2
Tourism may occur only seasonally or at specific times of the year in some areas of the	2
country and communities rely on year round income to survive economically	2
most job loss in the timber industry with federal timber flow policies	2
The Forest Service should help displaced timber workers and communities financially	2
with relocation, education, employment, and/or compensation	2
The suggestion that a government payment can be made to areas negatively impacted	
by the loss of timber harvest revenue is not acceptable	3
The Forest Service used biased methodologies to assess the impacts of the proposed rule	
inasmuch as it failed to include job losses created by conservation policies and	
politically motivated actions over the past 10 years	3
The Forest Service should address the socio-economic impacts of the proposed rule on	
outfitters and guides working in roadless areas	4
The Forest Service should consider the effects of the proposed rule on potential job	
loss for Forest Service employees	4
The Forest Service should consider the economic impacts of including the Tongass	
National Forest in the proposed rule	5
Roadless protection would hurt southeast Alaska's economy	5
Roadless protection would benefit both southeast Alaska's economy and the national	
economy7-3:	5
The Forest Service should consider that by delaying decisions on the status of the	
Tongass until 2004 it effectively precludes any new timber industry ventures in the	
Tongass	6
The Forest Service should consider the effects the proposed rule will have on surface	
transportation options in Alaska7-30	6
The Forest Service should analyze the economic effects of the proposed rule on Alaskan	
railroad companies7-30	6
The Forest Service should include the Tongass National Forest in the proposed rule	
for the benefit of commercial fisheries and the fishing industry	7
The Forest Service should eliminate subsidizes for road building and timber harvest	
on the Tongass	7
Each timber sale in Alaska should include analysis of the resulting potential loss of	
tourism revenue	8

The Forest Service should balance protection of fisheries and wildlife habitat with	
protection of timber harvesting levels and roading on the Tongass	
The Forest Service should verify economic statistics in the DEIS	. 7-39
The Forest Service should consider the negative impacts of declining federal timber	
revenue payments to rural counties	
The Forest Service failed to adequately evaluate the contributions to Payments	
In Lieu of Taxes funds from ski areas within roadless areas	
The Forest Service should consider that the purchase of private land to preserve scenic	
value will have little effect on local tax bases.	
The Forest Service should do away with the trust fund and timber receipt programs	
The Forest Service should not support Senate Bill 1608 which would require increased	
timber harvest to fund county schools.	
The Forest Service should reconsider the method used for funding counties from timber	
and grazing receipts.	
The Forest Service should analyze the economics of livestock grazing on National	
Forests and Grasslands.	
Eliminate grazing subsidies	
Curtail grazing	
Continue current grazing	
The Forest Service should consider the effect the roadless initiative will have on the	
coal and oil and gas industry	
The Forest Service should reevaluate the full social and economic effects of the	
proposed rule on present and future mineral exploration, production, and	
development	
The Forest Service should not delay approval of mineral operations, including	
exploration, surface activities, and development.	
The Forest Service should assess the potential loss of mineral lease income that may	
result from the proposed rule.	
The Forest Service and administration should employ policies and actions that provide	
the minerals industry with low risks associated with mineral exploration on the	
National Forests.	
The Forest Service should address the feasibility and cost of mining inside roadless	
areas or in areas surrounded by roadless areas.	
The Forest Service should consider the impacts of the proposed rule on energy	
resources that provide fuel to heat and light homes and to power industries.	7-48
The Forest Service should explain the rationale for predicted increases in mineral	
and natural gas production given the current and proposed policies affecting the	
national forests.	
The Forest Service should make restitution for the investments in licensing and	
exploration costs that mining operations will not be allowed to recoup because	
of this rule.	7-49
The Forest Service should not allow mineral and/or petroleum mining because these	., .,
operations will never make a net return and are harmful to the environment.	
The Forest Service should address the consequences of reduction of its traditional	
revenue sources.	7-53
The Forest Service should include the costs of litigating this proposal in agency costs	
The reserved here should metade the costs of hugating this proposal in agency costs	., 55

The Forest Service should select a more prohibitive alternative because of the savings	
to the agency and taxpayers due to lower implementation costs	
The Forest Service should explain how "overall agency costs are expected to remain	
the same" under Alternatives 2 through 4 when 60 million fewer acres would be	
managed.	
Forest Service funding should be increased	
The Forest Service should correct the "disconnect" between plans and the alternatives	
and budgets. Budgets should be presented to Congress on a forest-by-forest basis	
The Forest Service should assure that conservation dollars are spent for that purpose	
The Forest Service should disclose the costs of managing roads versus the costs of fire	
management.	
The Forest Service should explain how monies collected for removing timber and slash	
for fire prevention purposes were spent	
The Forest Service should update its analysis of the long-term costs of fire suppression	
versus costs of fuel treatment	
The costs of fire management and regeneration should be subtracted from the value	
of the timber products harvested to effect that mitigation.	
The Forest Service should reevaluate agency costs of fuels reduction and increased fire	
hazards in roadless areas.	.7-56
The Forest Service should lobby Congress for funding to address the issue of thinning	
in fire prone areas	
To save taxpayers' money, the Forest Service should harvest timber, not conduct	
prescribed burnings	
The proposed rule would increase susceptibility to catastrophic fires, which would	
harm the tourism industry.	
The Forest Service should not claim that a reduction in harvest resulting from the	
prohibitions would not likely affect timber prices	
The Forest Service should analyze the allowable sale quantity potentially generated	
from each roadless area	
The Forest Service should address "below cost" timber sales	.7-58
National forest timber should be sold "when the price is right" and not offered on a set	
schedule	
The Forest Service should sever the link between agency funding and timber harvest	
The government should not be in competition with private individuals.	.7-60
The Forest Service should consider that timber harvest plays a very small role in	
the economy	.7-60
The Forest Service should establish funding for seeding trees and restoration work	.7-60
The Forest Service should examine the cost/benefits of revegetating, stabilizing, and	
maintaining logged areas.	.7-60
Costs of timber sales must include Environmental Impact Statements, road building and	
maintenance for the life of the road, loss of recreational revenues, and costs of water	
purification	.7-60
The government must accept the responsibility for stopping extractive practices and	
find the money to pay for the damage already done to the environment	.7-61

The General Accounting Office should perform routine inspections to keep the	
Forest Service "on track" and inform the public about the economic viability	
of Forest Service timber harvest activities	
The Forest Service should be held monetarily accountable for their financial reporting	
accuracy	
The Forest Service should eliminate subsidies for extractive industries	
The beneficiaries of timber harvests should shoulder the major cost of road construction,	
maintenance, and reconstruction	7-62
Timber companies receiving subsidies should go through the official process of governmental review and oversight	7-62
The Forest Service should recognize that forest roads are not a subsidy to the timber	
companies	
The Forest Service should address costs for recreational use of National Forest System	
lands	
The Forest Service should encourage and subsidize the use of recycled rather than	
virgin fibers for paper production	
The Forest Service should analyze and disclose the amount and source of money used	
for the Roadless Area Conservation Proposed Rule.	
To acquire property and rights-of-way	7-64
To offset the costs incurred due to lack of management access for wildfire and	
forest health	7-64
The Forest Service has been budgeted too much money	
The Forest Service should not spend taxpayers' money on the proposed rule. It should	
be spent at a local level	7-64
The Forest Service should consider tax-based funding in order to pass this proposed	
rule	7-65
The Forest Service should explain where the money will come from to fund law	
enforcement and manage projects created by the roadless policy	7-65
Forest Service funding should be increased so that the agency can effectively manage	
and enforce existing laws	
The Forest Service should ensure adequate, regulated access in order to mitigate the	
costs of the enforcement required to prevent user created roads and trails.	7-65
The Forest Service should explain whether the interim moratorium on no road building	
or maintenance saved money.	7-66
The environmental analysis should include, at a minimum, a detailed accounting of the	
purported \$8.4 billion road maintenance "backlog."	7-66
The 8.4 billion dollar backlog figure is exaggerated and often used out of context	
The Forest Service has the funding to maintain its 380,000 mile network of roads; it	
just need to set its priorities straight.	7-66
The Forest Service should address the Watershed Improvement Needs Inventory	
backlog	7-67
The Forest Service should assure funding for continued road maintenance.	
Spend taxpayer funds on road maintenance and obliteration	
Ask county, state or federal highway programs to maintain or accept roads	
Lack of funding for road maintenance should not be used as an excuse to prohibit road	
construction or close roads	

Where maintenance costs are prohibitive, the Forest Service should consider posting	
some roads as unmaintained, with travel at one's own risk	7-68
The Forest Service should acknowledge that in the past road maintenance was provided	
by timber sale purchasers	7-68
The Forest Service should correct its estimate of the savings from reduced road	
maintenance to reflect recent expenditures on roads.	7-69
The Forest Service should address the relation between its lack of funding for road	
maintenance and continued funding for international forestry programs	7-69
The Forest Service should disclose the funds spent on road obliteration.	
Closing roads or restricting motorized access would negatively impact the economy	
The Forest Service should maintain trails to avoid hurting the economy	
If the Forest Service lacks funding, they should allow roads to decommission naturally,	
or by gating or placing ditches across them	7-70
The Forest Service should consider the negative impacts of roadless area designations on	
usable Forest Service roads and the Purchaser Road Credit Program.	7-70
The Forest Service should not spend funds building roads into all roadless areas just to	
make it easier to fight wildfires.	7-70
The Forest Service should explain who finances the design and planning of logging	
roads	7-70
Any funds saved by ceasing maintenance of roads should be used for other management	
activities.	7-70
For alleviating the environmental impacts of roads	
For facilities upkeep	
For upgrading existing four-wheel drive roads and expanding facilities for the	
handicapped	. 7-71
The Forest Service should provide a comparison between the Forest Service's requests	
for road maintenance funding and congressional appropriations for road maintenance	
over the past five years	7-71
Chief Dombeck should ask for funds to adequately support the Forest Service's	
recreation and trails programs	7-71
There should be increased funding for support of recreational goals and uses of	
roadless areas.	7-71
The Forest Service should consider the benefits from fees and volunteer services	
contributed by users to maintain roads and trails	7-72
Funding from the off-highway vehicle community may be terminated due to agency	
misuse of those funds	7-72
The formula for determining the share of the gasoline tax for off-highway vehicle	
recreation should be audited due to the adverse impacts caused by motorized users	7-72
The Forest Service should not make the public purchase permits or charge user fees	
to use public lands	
Discontinue the trail park fee demonstration program	
Discontinue the Adventure Pass program	. 7-73
The Forest Service should incorporate a fee or permit system for using certain areas	
of public lands	
Charge fees based on the amount of damage a particular activity causes	
Impose a \$15.25 fee on bicycles and cross-country skis	
Expand the trailhead permit system	. /-74

Chapter 8 Cumulative Effects Analysis 8-1

The Forest Service should elucidate the relationship between the proposed rule and	
concurrent rulemaking initiatives.	8-3
Relationship to the Road Management Rule	8-3
Relationship to forest planning Regulation revisions	8-3
Relationship to the Interior Columbia Basin Ecosystem Management Project	
Relationship to local Habitat Conservation Plans	
Relationship to multiple other initiatives	
Specific forest plans	8-6
The Forest Service should complete the concurrent national rulemakings in a logical	
sequence.	8-6
By adopting the Planning Rules first	8-7
Public Concern: By waiting until terms and definitions in the Transportation Policy	
are adopted	8-7
The Forest Service should integrate the proposed Roadless Area Conservation Rule	
with other concurrent rulemaking initiatives.	8-8
With the Transportation Policy.	
With the Planning Rules	
With multiple other rules	
The Forest Service should evaluate the current forest plan direction for each roadless	
area	8-9
The Forest Service should analyze the cumulative effect of the proposed rule with	
concurrent proposed rulemaking initiatives and current environmental legislation	
With the road management rule	
With the Unified Federal Policy for Ensuring a Watershed Approach to Federal Land	
and Resource Management.	8-10
With both concurrent national rulemakings	
With multiple other initiatives	
With existing environmental legislation	8-11
With past withdrawals of National Forest System lands for environmental protection	
The Forest Service should address the site specific cumulative effects of concurrent	
rulemaking initiatives on individual national forests	8-12
The Forest Service should prepare a meaningful cumulative effects analysis for the	
Final EIS.	
Distinguish direct and indirect effects from cumulative effects	
Comparison of the alternatives	
	8-13

Chapter 9 Technical and Editorial Concerns	9-1
The Forest Service should make its Environmental Impact Statements shorter and less complicated.	9-1
The Forest Service should eliminate repetition in the Draft EIS.	
The Forest Service should use clear and honest language	
The proposed rule is vague and short on reasoning	
The Forest Service should clearly distinguish the difference between conservation and preservation.	
The Forest Service should clarify the use of the phrase, "the roaded portion of the inventoried roadless area."	
The Forest Service should clarify the statement in the booklet of questions and answers that this proposal would "prohibit construction and reconstruction in most inventoried roadless areas."	
The Forest Service should clarify the phrasing of the proposed rule's alternatives	9-3
The Forest Service should remove the word "whether" from all the alternatives in the	
Draft EIS.	9-3
The Forest Service should evaluate the use of the word "natural" in describing roadless areas.	9-3
The Forest Service should address contradictions in the cumulative effects analysis	
The Forest Service should address contradictions in the Draft EIS regarding the evaluation of roadless characteristics and values	
The Forest Service should reconcile the differences between the issues identified in the abstract and those cited throughout the rest of the Draft EIS.	
The Forest Service should clarify the difference between responses and comments	
The Forest Service should reconcile contradictory statements in the proposed rule	
regarding the right to build mining exploration roads.	9-5
The Forest Service should reword the Civil Justice Reform Act section of the	0.5
Draft EIS.	9-5
The Forest Service should address inconsistent estimates of road construction in	0.5
the Draft EIS Five year estimates for road construction and reconstruction in inventoried roadless areas	
The Forest Service should clarify the discrepancy between the Interior Columbia Basin	9-3
Ecosystem Management Project's estimate of impaired streams and that contained	0.6
in the Draft EIS.	9-6
The effects analysis in the Draft EIS should specify what types of uses will be prohibited	0.6
in uninventoried roadless areas and other unroaded areas	
The Forest Service should specify the referent of the word "treaty" in the Draft EIS.	
The Forest Service should identify the controversial issues mentioned in the Draft EIS	9-7
The Forest Service should specifically identify the "threats to wilderness character"	~ -
mentioned on page 3-138 of the Draft EIS.	
The Forest Service should identify A-7 special designations.	
The Forest Service should delete undefined phrases on page S-14 of the Draft EIS	9-7
The Interdisciplinary Team should consider addressing the effects of the proposed	
rule on subcategories of the Recreation Opportunity Spectrum	9-7

The terms "classified" and "unclassified" roads should be changed to "maintained" and	
"unmaintained."	9-8
The Forest Service should replace the phrase "ensure consideration" with "ensure	
compliance with the rule" in item 2 of the proposed rule	9-8
The Forest Service should replace the wording of "most restrictive" with	
"most protective" when describing Alternative 4	9-8
The Forest Service should change the statement "the proposed action would prohibit	
road construction and reconstruction in inventoried roadless areas" to "prohibit road	
construction and reconstruction in unroaded portions of inventoried roadless areas"	
in the Draft EIS.	9-8
The Forest Service should change the statement "no roads or trails would be closed	
because of the prohibitions" to "no classified roads would be closed because of these	
prohibitions" on page S-1 of the Draft EIS	9-8
The Forest Service should change the phrase "of considerable length" to "of meaningful	
length" in Section 294.13(B)(2) of the proposed rule	9-8
The Forest Service should combine the discussions of timber harvest on	
pages 3-112 and 3-182.	9-9
The Forest Service should use the terms "scheduled" and "unscheduled" harvest when	0.0
discussing the alternatives	
The Forest Service should modify the language of 36 CFR.	
294.12 294.13	
The Forest Service should address the grammar and clarity of paragraph 294.13(a) in	9-9
the Draft EIS.	9-10
The Forest Service should use a hierarchical numbering system for the pages of	., 10
Chapter 3.	
The Final EIS should replace the term "dispersed recreation" with the more appropriate	
term "recreation setting."	
The Forest Service should clarify page S-36 of the Draft EIS.	
The Forest Service should change "eliminating" to "eliminate" in the last paragraph of	
page 3-31	
The Forest Service should clarify the heading of table 3-9 on page 3-51.	
The Forest Service should reword "The largest would increase occurs in" in the third	
paragraph of page 3-53.	.9-11
The Forest Service should reword "precise estimates" on page 3-57 of the Draft EIS	9-11
The Forest Service should use more than one example of beneficial stewardship	
activities on page 3-66 of the Draft EIS	
The Forest Service should address typographical errors in paragraph two of page 3-137	
The forest service should reword the first sentence of paragraph five on page 3-141	9-11
The Forest Service should reword or insert modifiers to the last sentence of the last	
paragraph on page 3-217	
The Forest Service should add "harvest" to the end of "which do not prohibit	
roading and timber" on page 3-325.	
The Forest Service should correct the spelling of "old growth dependant" on	0.12
page 3-236	
The Forest service should replace "certainty" with "certainly" on page 3-237	
The Forest Service should correct Table 3-19 with regard to fire statistics.	.9-12

The Forest Service should add "recreation stock use" to the list of dispersed recreation	
activities.	9-12
The Forest Service should withdraw Appendix A from the Draft EIS	9-12
The Forest Service should reevaluate and clarify its definition of a road.	
The definition is misleading	
Clarify the 50-inch rule	
The Forest Service should clarify the term "existing road."	9-15
The Forest Service has changed the definition of the term "road" from the one	
contained in the Wilderness Act.	9-15
The Forest Service should reassess the use of the term "Forest Service Roads."	9-16
The Forest Service should recognize that any travelway used by horses, bikes,	
vehicles, or pedestrians is a "road."	9-16
The Forest Service should define "trail."	9-16
The Forest Service should clarify the distinction between "roads" and "trails."	9-16
The definition of a road should be changed from 50-inches wide to 72-inches wide so	
that popular trails will not be decommissioned.	9-16
The Forest Service should clarify various road levels and trail designations	9-16
The Forest Service should consider snowmobile trails as winter "roads."	
The Forest Service should clarify the definition of "other vehicle travelways."	9-17
The Forest Service should clarify the definition of the classification "roadless."	9-17
The definition is misleading	9-17
Inventoried roadless areas, unroaded areas, and classified roads	9-17
The Forest Service should not use the term "roadless" for areas with existing roads	9-18
The Forest Service should address conflicts between the proposed definition of	
roadless and the guidelines used for previous inventories	9-18
The Forest Service definition of roads and roadless should comply with state and	
county definitions	9-18
The Forest Service should set clear boundary definitions for inventoried roadless	
areas	
The Forest Service should define "irreversible loss of roadless character."	9-18
The Forest Service should modify its definition of inventoried roadless areas in	
Section 294.11 of the proposed rule.	
The Forest Service should define the terms "unroaded" and "other unroaded areas."	9-19
The definition will increase litigation costs	
The Forest Service should clarify the definition of the term "classified road."	9-20
The Forest Service should determine whether the redefinition of many existing	
recreational roads and trails as "unclassified" would result in the closure of	
campgrounds and other recreational facilities.	9-20
The Forest Service should reevaluate its definition of "reconstruction."	9-20
The Forest Service should clarify the distinction between "construction" and	
"reconstruction."	9-21
The Forest Service should clearly define "new" road construction	9-21
The Forest Service should clarify the difference between rebuilding a road and road	
reconstruction	9-21
The Forest Service should clarify the definitions of "reconstruction" and	
"maintenance."	
The Forest Service should clarify the definition of the term "maintenance."	9-21

The term "decommission" should be defined in the document.	9-21
The Forest Service should define the term "valid" regarding access to public or	
private land within roadless areas.	9-22
The Forest Service should clarify the definition of "valid existing rights."	9-23
The Forest Service should modify its definition of "existing lease" in the Final EIS	
The Forest Service should define what "essential management" means in terms of	
exceptions to the roadless areas.	9-23
The Forest Service should define the term "stewardship."	9-23
The Forest Service should define the term "impairment" as it is used to describe	
watersheds	9-23
The Forest Service should define the term "huge."	9-23
The Forest Service should define threatened, endangered, proposed and sensitive	
species	9-24
The Forest Service should include recreational and timber harvest access in the	
definition of "vital access."	9-24
The Forest Service should define the word "protect."	9-24
The Forest Service should include people who use paper or live in wooden houses	
in the definition of "stakeholders" on page S-39 of the Draft EIS.	9-24
The Draft EIS should include all definitions of small entities contained in the	
Regulatory Flexibility Act.	9-25
The Forest Service should clarify the definition of user vehicles	
Standard passenger vehicle	
Off-road/off-highway vehicle	
The Forest Service should define the term "non-attainment" in the Draft EIS	9-26
The Forest Service should define the terms "even-aged," "shelterwood," and	
"seed tree."	9-26
The Forest Service should include "recreation" in the glossary of the Draft EIS	9-26
The Forest Service should clearly define "potentially isolated" areas	
The Forest Service should define all acronyms used in the Draft EIS.	9-26
The Forest Service should remove the term "wildland" from the Draft EIS	9-27
The Forest Service should clarify what constitutes "imminent".	9-27
The Forest Service should make its maps clear and accurate	
Correct inaccuracies of maps on the web	
The maps included with the Draft EIS should provide sufficient detail	9-29
Update maps to include uninventoried unroaded areas and wilderness areas	
Increase scale	9-30
The Forest Service should create accurate, up-to-date maps and acreage calculations	
of the unroaded portions of inventoried roadless areas.	
The Forest Service should map the location and size of every roadless and unroaded area	
before making any rules	9-30
The Forest Service should reconcile the large discrepancy in the number of acres of	
inventoried roadless areas on the Intermountain Region web site with that on	
national forest maps.	9-31
The Forest Service should provide accurate maps of the Inyo National Forest in	
Volume 2 of the Draft EIS	
The Forest Service should clarify the table of contents for Volume 2 of the Draft EIS	9-31

The Forest Service should clarify whether the farthest-north portion of the Badger-Two	
Medicine area of the Lewis and Clark National Forest is considered an "inventoried	
roadless area" on the roadless Draft EIS map	9-31
The Forest Service should improve the shading of Figure 3-17 on page 3-50	
of the Draft EIS	9-31
The Forest Service should correct the graphics in the Draft EIS	9-31
The Forest Service should provide a better representation of mining permissive tracts	
in the Draft EIS maps	9-31
The tables in the Draft EIS should be scientifically based.	9-32
The Forest Service should address inaccuracies in tables of the Draft EIS	9-32
The Forest Service should clarify the data presented in Table 3-20 of the Draft EIS	9-32
The Forest Service should clarify discrepancies between Table 2-2 and page 3-76	
of the Draft EIS	9-32
The Forest Service should address the data presented in Appendix B.	9-33