

Chapter 1 Purpose and Need

This chapter addresses two related topics. Section 1.1, General Reasons For and Against Adoption of a Roadless Area Conservation Rule, includes range of opinion submitted by the public regarding whether or not a rule should be finalized. Section 1.2, The Mission and Guiding Policy of the Forest Service, includes concerns addressing the overarching mission of the Forest Service. These include representative opinions offered by the public about the appropriate guiding policy for managing national forests in general and roadless areas in particular. The concerns presented in Chapter 1 are in fairly broad in nature; those of greater specificity are found in succeeding chapters in the context of particular affected resources or human uses and values of National Forest System lands. See Chapter 5 for more specific environmental concerns, Chapter 6 for in-depth concerns surrounding forest management and human uses of National Forest System lands, and Chapter 7 for concerns regarding specific socio-economic topics.

1.1 General Reasons For and Against Adoption of a Roadless Area Conservation Rule.

Overall, respondents are quite polarized in their opinion of the roadless area conservation rulemaking effort. This section is organized into the following subsections: 1.1.1 Why the Forest Service Should Adopt a Roadless Area Conservation Rule; 1.1.1.1 Access Considerations; 1.1.2 Why the Forest Service Should Not Adopt a Roadless Area Conservation Rule; and 1.1.2.1 Access Considerations.

1.1.1 Why the Forest Service Should Adopt a Roadless Area Conservation Rule

A great number of respondents believe the Forest Service should adopt a Roadless Area Conservation Rule. Those who favor this rulemaking effort believe that now is the time to act to protect the remaining intact ecosystems of National Forest System lands before more of these lands are altered by commodity extraction and other human uses. Some note that roadless areas should be protected for their intrinsic value, but most point to numerous positive benefits that are derived from these areas. Many feel that roadless areas are most valuable as a reservoir for biodiversity, for game habitat, for maintenance of water quality for humans and fisheries alike, and for dispersed forms of recreation. These benefits, writers assert, are threatened by roads. Roads are one of the greatest sources of erosion, some state. Many note that roads allow increased human access, which leads to such impacts as increased litter and wildlife disturbance. Roads can result in erosion, siltation of streams, stress to native species, increased off-road vehicle use, and the invasion of non-native invasive species, others comment. Still others assert that roadless areas are more fire resistant than roaded areas. “I am a firefighter for the Plains/Paradise Fire District. Here in Montana, a majority of timber/grass fires are ignited

adjacent to roads. The statistics in the EIS support the fact that fire frequency in the roadless lands is significantly less than that in roaded lands,” writes one individual.

Often supporters of the rulemaking lament that many of their favorite special wild places have already been lost to road construction, timber harvest, mining activity and increased motorized use. Many feel that the native ecosystems of the vast majority of National Forest System lands have been significantly altered by management activities, and therefore remaining wildlands should be preserved. Others note the progressive loss of open space on private land to commercial and residential development and view protected roadless areas as a critical counterbalance to these trends.

Respondents often argue that more roads are simply not needed, pointing out that Forest Service lands are already extensively roaded and ample access currently exists. Indeed, supporters claim, polls demonstrate that most citizens support roadless protection. In addition, writers often charge that roads are a net money loser for taxpayers. Many state that Americans should protect their own National Forest System roadless areas before criticizing developing nations for unsustainable forestry practices. Moreover, some writers believe the agency should not wait for specific legislation to adequately protect these areas for we have little influence over what future legislators beholden to special interests might do. Rather, one writer suggests the agency should use its rulemaking authority to protect roadless areas now: “The most effective way to limit abuse of these lands is to make future abuse more difficult by not providing the ‘foot in the door’ that roads, even primitive roads, provide.” Others hope that the proposed rule would prompt local administrators “to manage roaded lands better in the future, based primarily on environmental considerations.” Many supporters of the rulemaking express distrust of local forest management and submit that “getting the cut out” has often overshadowed other considerations; therefore, these writers urge the adoption of a strict national policy to limit the discretion of line officers to enter roadless areas. “Local decision-makers cannot be expected to maintain the roadless values of these areas without explicit direction from a federal rule,” asserts one environmental organization, a sentiment echoed by many individuals. Writers believe that work needs to begin now to direct consistent management of remaining roadless areas.

Prohibiting road building is the very least the agency can do, many conclude. Few, however, feel that the Preferred Alternative in the Draft EIS goes far enough toward effective roadless area protection. Many ask that the Forest Service protect all National Forest System roadless areas, both inventoried and uninventoried, of at least 1000 acres, from all activities they believe are destructive. This includes not only such as road construction but logging by any method, mining, livestock grazing, and motorized recreation, they say. Most also request that the Tongass National Forest be included in the final rule and that the Forest Service provide interim protection for other unroaded areas through project-by-project analysis as a transition to the forest planning process. Many proponents urge the Forest Service to remove recently built roads in order to enlarge roadless areas and restore inventoried roadless areas to their original RARE II size. Some writers suggest that roadless areas should be managed with guidelines similar to those of designated wilderness areas. While not all proponents suggest that level of restriction, there is a general consensus among these respondents that roadless areas should be strictly protected. Indeed, writes one respondent, “We do not know the effect of loss of biodiversity in these areas...Until [we do], the best long-term alternative is to not disrupt these remaining

natural systems in any way.” Some writers also request that a time frame be added to the final rule to assure that roadless areas should be kept roadless essentially in perpetuity.

A number of critics believe that the alternatives presented in the Draft EIS do not meet the purpose and need described in the Notice of Intent. “You started this project off with a mandate from the President that would have allowed you to protect vast areas of our National Forest System unroaded lands, to preserve their unique characteristics over a long period of time. The Alternative that you have chosen does not reflect any portion of this vision,” laments one respondent, an expression of dismay echoed by many others. They maintain that the scope of the rule should be returned to its original intent, to protect 60 million acres from all damaging activities. Most assert that road construction is only one of many such activities, and many feel that commercial timber harvest is far more detrimental to ecosystem integrity than road construction alone. Some respondents assert that logging promotes insect outbreak, reduces resilience to disease, and increases fire danger by removing the most fire-resistant forest components. Thus, given the Forest Service’s failure to ban logging, this detrimental effect “immediately contradicts the Forest Service’s stated reason for carrying out the project described in the purpose and need by creating the opposite effect,” one writer charges.

Public recreational access is heated topic for most respondents, whether they are in favor of or opposed to the rulemaking. Given the dramatic increase in recreational use of the national forests, the public perceives a very direct personal effect from travel management decisions. Given that forest roads of all kinds are the primary means of access to the national forests for many recreationists, relatively few members of the public separate road infrastructure management issues from travel management decisions. As a result, some note, the rulemaking has generated a firestorm of opposition due to a perceived loss of access. Many proponents of the proposed rule therefore urge the Forest Service to clarify that this proposal would not lock anyone out of national forests or roadless areas. The proposed rule, they point out, does not close any existing roads or trails or limit access for recreation or other uses.

Finally, some respondents who identify themselves as senior or disabled citizens write in support of the proposed rule. They state that even if restrictions on road construction do limit access to roadless areas, it is more important to preserve them. “I am an older person, no longer able to get myself into remote regions on foot. It does not matter that I cannot personally enjoy roadless areas. Their existence is enough in themselves,” writes one individual. Other respondents who identify themselves as seniors or disabled maintain that they still prefer to walk for health reasons and that the proposed rule does not hinder their enjoyment of national forests. Indeed, a number of writers claim the entire “senior citizen access” argument is weak, irrelevant, and lacks credibility. As one respondent notes, “If I have a desire to take a motorized drive through some of our public lands, I have access to thousands of miles of federal, state, county, and Forest Service roads that traverse the same types of areas and geography that is proposed to be protected from further road building. I think the excuse of being denied access because of age or impairment is a weak one.” According to another respondent, the concern about access for senior citizens and the disabled “is a concern more often raised by those who have a special interest in motorized access to our nation’s wild areas rather than any interest in addressing the full range of accessibility issues that are of greater priority for people with disabilities.”

Public Concern: The Forest Service should adopt a Roadless Area Conservation Rule.

The proposal by the Forest Service last October to protect 60 million acres in our national forests represents a wonderful, bold and intelligent step in our national life. It will, of course, encounter enormous resistance but I think the majority of Americans can see far enough into the future to realize the time to take such a measure is now, not when roads, settlements, businesses, alluring but elaborate vacation spots have all been put in place by commercial interests. These enterprises have enormous tracts of land for scenic and recreational enjoyment. Please give your energetic best to support the possible regulations in favor of roadless areas. (Individual, Machias, ME - #998.10000)

I wholeheartedly support the Forest Service's initiative to protect up to 60 million acres in our national forests from road building, logging, and other activities that could harm their wild character. Such a step is vital if we are to protect critical drinking water supplies and wildlife habitat. (Individual, No Address - #353.10100)

I know that all this would be a huge change from the Forest Service's former (at least it appeared to be) mandate of helping loggers "get the cut out", but subsidized destruction of our forests isn't in our best interest anymore. (Individual, Hydesville, CA - #3524.93644)

Building roads to protect from fire is not justified. Human access and logging activities can increase fire danger. Larger, more mature trees are more resistant to fire than thin crowded stands of second growth after logging. And precisely because of natural fire, more natural areas need to be set aside to preserve them after one area burns. (Individual, West Linn, OR - #706.84200)

ACKNOWLEDGE THAT ROADLESS AREAS ARE MORE VALUABLE FOR THEIR NON-COMMODITY RESOURCES

The best policy for federal lands takes into account that they are owned by the public and thus subject to careful and respectful management just as someone would treat another person's property. Reverse incentives such as "purchaser road credits" and the Knutson-Vandenburg of 1930 degrade and destroy forests for short-term gain at the expense of long-term integrity. As reported by the American Viewpoint survey last January, 76% of the citizenry support roadless protection and I solidly stand among them. (Individual, Morrisville, VT - #911.10100)

There is no longer any valid economic reason (timber subsidies at taxpayer's expense) to build more roads. Roadless areas have much more value in the tourism, recreational and commercial fishing, and subsistence uses they will provide for future generations. (Individual, Sitka, AK - #18578.92300)

Preserving natural environments provides a wide array of benefits to society (Krutilla and Fisher 1975). Those benefits include on-site non-motorized recreation use, scientific research, biological diversity, and habitat for fish and wildlife, (U.S. Forest Service 2000). Although lands need not be formally preserved to provide these values, some form of land protection is needed to ensure that these values continue into the future. (Individual, Dickinson, ND - #16095.90200)

PREVENT THE DETRIMENTAL ENVIRONMENTAL EFFECTS OF ROADS

Roads have been a great environmental problem in our national forests, second only to clear cutting. They erode fragile areas, stress native species, invite off-road vehicles deep into pristine areas, and provide for the invasion of non-native species. Worst of all, they are proven money losers for taxpayers. We underwrite the expenses of logging companies that then proceed to destroy a prime national asset. There is far more value in our forests for their positive environmental impact, for their habitat, and for passive recreation like hiking and backpacking. (Individual, Normal, IL - #332.10100)

The quickest and most successful way to protect forests and watersheds is to stop roading in the forest. Study after study both private and public has confirmed that one of the greatest sources of erosion in forests is the road system. Further roads are not needed. The Forest Service now has one of the largest road systems on the planet. (Individual, Neosten, OR - #392.10100)

Preventing roads from being constructed that would run through the untouched areas is the least we can do to protect the forests. Building roads does not just mean building roads, it leads to buildings (bathrooms, gift shops, restaurants). It will also lead to increased litter on the immediate areas surrounding the road. (Individual, No Address - #328.10100)

LIMIT ENVIRONMENTAL DEGRADATION DUE TO GREATER HUMAN ACCESS

America is already covered with one of the most extensive and efficient networks of roads found anywhere on the globe. Over 386,000 miles of roads today crisscross our national forests, providing access to beautiful sites for recreation and other uses, including logging. Further road construction, or logging in currently roadless areas, will only degrade the precious remaining acres of currently roadless forest, diminishing water quality, habitat connectivity and other critically important wildlife values. (Individual, Sierraville, CA - #1491.83000)

During the past 35 years I have watched the Trappers Lake area in the White River National Forest fade from the once almost wild place it was to become like a city park recreation area. The fishery has steadily deteriorated and it will never be the same. One day the pure native cutthroat will be gone. And all of this was begun back in the late 60's so that "more people" could enjoy this experience. That experience has now been lost forever. Trappers Lake will never be the wonderful natural place it was. The lakeshore and water become more filled with trash each year. The native fish will in time be lost as the brook trout take over and interbreed. The campground is a den of noise with generators on RV's (which should be relegated to KOA campgrounds and not allowed in National Forests), four-wheel motorized vehicles and children riding around on their bikes just as if they were home. This is enjoying the great outdoors?? Everyone loses in this scenario. Making Trappers Lake very accessible to any and all has lessened the experience for all. (Individual, Grand Junction, OR - #7570.91600)

ACKNOWLEDGE THAT ROADLESS AREAS ARE LESS FIRE-PRONE THAN ROADED AREAS

[Opponents'] concerns were that if this land was set aside as roadless then how could it be managed without access? This is ridiculous; these lands survived just fine without roads prior to the white culture's arrival in the west. Another point was that a lack of roads would hinder fire protection. I am a firefighter for the Plains/Paradise fire district. Here in Montana, a majority of timber/grass fires are ignited adjacent to roads. The statistics in the EIS support the fact that fire frequency in the roadless lands is significantly less than that in roaded lands. . . . Wilderness advocates are many, they pay taxes and want to save these lands not for profit but because it is what is best for the forest. (Individual, No Address - #18287.10100)

In the seven years I have lived in Montana, I have paid close attention to the impacts of unsustainable logging practices and roadbuilding on mountain ecosystems. The visible and undeniable consequences of these practices have been an everyday reality for me as a modern homesteader. . . . The practices of recent history are neither healthy nor sustainable. The logging of the past has involved cutting the largest, healthiest trees which traditionally withstood fires and reseeded the forest for future generations. To this day logging practices place convenience over sustainability. If roaded areas had been sustainably managed, there would be neither the "need" nor desire to cut more roads . . . and a moratorium on further roadbuilding is a long-overdue step in the right direction to a sustainable future. (Individual, Lolo, MT - #11083.10100)

HALT THE LOSS OF REMAINING INTACT FOREST ECOSYSTEMS

I grew up in East Tennessee and enjoyed truly wild areas in Cherokee and Nantahala National Forests. Almost all of the places we camped and hiked have been roaded, logged, and some clearcut. Let's not allow that in the tiny bit of roadless areas left. (Individual, Boise, ID - #10978.10100)

I have spent 36 years hiking, climbing, fishing, and hunting in the Naches Ranger District. In that time I have seen several of my favorite backcountry areas invaded by roads, and overall quality of the area degraded. Wildlife numbers decline. Hunting and fishing opportunities have eroded. Peace, quiet and solitude have been shattered by passenger vehicles. (Individual, Yakima, WA - #2760.90000)

In my youth, I think that most people sort of had a notion that there would always be plenty of wild country. A road here, a road there. Log this pristine drainage, log that one. But every time you build one of those roads, the

wilderness gets pushed back just that much more. And pretty soon, we were all looking at a place that had changed more than we expected. Wildlife habitat had been altered and fragmented. Security areas and travel corridors had been removed and cut off. Spawning areas had been silted in or rendered inaccessible because of poorly placed culverts. "Road hunting" became a favorite fall activity in the Swan. And conflicts between wildlife use and human use had increased dramatically. Today, that valley is not the same place that enriched me so as a kid. And that is only one valley. Similar changes have occurred all across the mountain country of Montana. Much of what was so recently wild, much of what has taught us, challenged us and sustained us over the years is no more. And of course, we cannot replace the wild country that we have lost. (Individual, Choteau, MT - #422.10100)

Please protect what is beautiful and natural in this country. Since YOU have the power and are making a decision that will affect ALL of US, I beg you to conserve ALL the wildland WE have left. I can't tell you how many of my friends and family that are in agreement who want YOU to continue...keeping OUR forests the way they are and improving, in some cases. Please protect OUR UNROADED areas. (Individual, No Address - #1324.10000)

I have been to many National Forests during my life, and I have seen many beautiful places. Unfortunately, I have also seen too many places devastated by logging and other destructive activities. (Individual, Boulder, CO - #7599.93300)

END THE NET LOSS TO TAXPAYERS OF ROAD CONSTRUCTION

The value of using the forest for hiking, camping, fishing and hunting, plus old growth ecosystem protection are all more important than losing taxpayer money and ruining the landscape with below-cost timber sales. (Individual, Marion, AR - #938.90000)

I also object to the fact that my tax dollars have been used to subsidize access for the timber and mining industries who clear cut our national forests, pollute our streams, and further endanger wildlife species. (Individual, Atlanta, GA - #19482.90000)

Economics enter into the argument. Let us talk money. Subsidies for road building cost the taxpayer three times: \$ to build the road, \$ to maintain the road, \$ to mitigate the direct and indirect damage they cause to our environment (loss of water quality and species diversity). (Individual, Bellingham, WA - #1954.93000)

SET AN EXAMPLE FOR THE WORLD

The United States has been blessed with a multitude of beautiful, wild places. It is our duty as forward thinkers to set an example to the rest of the world of the importance of protecting these precious resources. (Individual, Portland, OR - #4368.10100)

If we are indignant about the Brazilians destroying the rainforest--we need to clean up our own act first. Cutting ancient forests is a crime of enormous magnitude. (Individual, Bayside, NY - #1424.10100)

ENCOURAGE IMPROVED STEWARDSHIP OF ROADED AREAS

In most western states, about half of the national forest lands have roads and will be under no management restrictions. In addition to protecting the roadless areas, [the proposed rule] will hopefully also serve as a reminder to local administrators to manage roaded lands better in the future, based primarily on environmental considerations. (Individual, Providence, UT - #4016.10100)

You and the timber companies need to better manage those areas already affected. How about a more rigorous effort to regrow and harvest trees in all those clearcuts on the Clearwater and Panhandle National Forests? Manage your timber needs from the roads that already exist, and leave the roadless lands alone. **NO MORE ROADS!** (Individual, Boise, ID - #7732.84600)

DETER FUTURE LEGISLATIVE ABUSE OF PUBLIC LANDS

A problem with attempting to limit use/abuse of these lands via legislative means only is that we have little control over what future legislators will do to try to satisfy the particular interest groups to which they are beholden. The most effective way to limit abuse of these lands is to make future abuse more difficult by not providing the 'foot in the door' that roads--even primitive roads--provide. We have too many roads in formerly pristine areas now that should never have been built. (Individual, Boston, MA - #2337.41300)

LIMIT THE DISCRETION OF LOCAL PERSONNEL TO ENTER ROADLESS AREAS

This policy is of particular interest to me and many of my friends and colleagues here in Wyoming because our local Forest Service officials are so obsessed with cutting timber that they cannot even be trusted with these special areas. . . . For years, the people of southeastern Wyoming have begged and pleaded with these officials to spare some of our forest from the chainsaw, and they have answered our request with nothing but more clearcuts. (Individual, Laramie, WY - #9244.10100)

Local decision-makers cannot be expected to maintain the roadless values of these areas without explicit direction from a federal rule. (Environmental/Preservation Organization, Chapel Hill, NC - #52231.64240)

Your 1995 proposals first emphasized ecosystem goals and scientific understanding. Only five years have passed! Your work on habitat and watershed preservation has hardly begun! . . . Do you realize that when these local officials were getting their educations, there were no classes in eco-sciences? Local control will favor exploitation and careless economics. The Forest Service must go forward with its eco-management. Please immediately halt all road-building in the inventoried roadless as well as the un-inventoried roadless areas. Then as you do on-going planning, insure this protection from any further exploitation. (Individual, Cottage Grove, OR - #54552.64250)

We are frustrated, angered and disgusted when we drive, hike, ski, bike etc. in our National Forests and see the devastation and aimless destruction of clear-cutting and excessive roadbuilding, and then realize it is supported by our tax dollars. Now we have all heard the arguments on both sides of this political, environmental and social issue: jobs, forest fires, disease, bugs, water, air, habitat, our children and grandchildren, etc. We are reasonable people and we wish there was a way to come to a compromise, but it is too late for that. Unfortunately due to decades of mismanagement and abuse of our public lands and mistrust of the Forest Service and the timber industry it has come down to an ALL OR NOTHING SITUATION. AND WE AS CONCERNED CITIZENS VOTE FOR NOTHING!! (Individual, Portland, OR - #53057.10100)

Public Concern: The Forest Service should strengthen the Preferred Alternative to prohibit all destructive activities and include the Tongass.

Please provide immediate and lasting protection for all national forest roadless areas, both inventoried and uninventoried, of at least 1000 acres. Prohibit all roads, logging, and other destructive activities associated with roads, such as off-road vehicles on those lands. Please do not exclude the Tongass National Forest i.e., no loopholes, exemptions, or waivers. Provide interim protection for other unroaded areas through project-by-project analysis as a transition to the Forest Plan process. Thank you for your kind attention to this matter. Our roadless areas are very valuable to us. (Individual, No Address - #45.10100)

From your public statements, it seems that you have interpreted this mandate as narrowly as possible. The whole point of preserving a roadless area is protection from any destructive activities, not merely protecting it from roads. (Individual, Aloha, OR - #890.10110)

I am studying the roadless DEIS and, though I'm encouraged by the direction the FS is heading, I don't think the protection your preferred alternative offers is enough. Commercial logging should not be allowed in roadless areas. The separation of the Tongass Forest from the rest of the system concerns me. Roadless areas of that northern wilderness should remain roadless and should exclude mineral exploration and logging. Logging and roads have done more to damage our precious landscape than any other human activity. Please take advantage of the popular

citizen desire to preserve the ecological integrity of our public lands by installing the highest level of environmental protection possible. (Individual, Chico, CA - #506.10110)

Mining, logging and cattle grazing have no place in these precious forests. (Individual, Eugene, OR - #157.10100)

While I am thrilled at your upcoming proposal to end road building in our national forests, I am concerned that your proposal does not go far enough. Banning new roads is very important in protecting wilderness; it is also vital to stop logging completely. How do you expect to protect something if you're removing bits and pieces from it?? Also, why not ban ATV recreation in sensitive areas that need extra care to recover? These destructive practices need to be banned right along with road building in order to grow healthy forests. (Individual, Playa Del Rey, CA - #428.10110)

I would like to see you go further and ban road building, logging, mining, off-road vehicles and, if you have lakes, personal water craft. (Individual, Greenbrae, CA - #973.10110)

Because of the triple impact of logging, mining and urban sprawl, our "wildlands" are quickly disappearing. Once roads appear in these areas it automatically leads to more roads and the environment is permanently impacted. If nothing else the PLAN is actually TOO limited. It still does not prevent INDIVIDUALS and ATV users from creating their OWN roads. (Individual, Helena, MT - #2631.10110)

The Forest Service should go further than just securing these roadless areas into a permanent roadless state. Especially in the eastern and other high population areas of the U.S. Recent roads should be closed making these areas larger. Then no logging by air or any other method should be allowed. (Individual, Talking Rock, GA - #800.10110)

I support the following position: THE FOREST SERVICE MUST PROVIDE STRONGER PROTECTION FOR BIODIVERSITY THAN IS PROPOSED IN ITS DEIS "PREFERRED ALTERNATIVE." THE TONGASS NATIONAL FOREST AND SMALL ROADLESS AREAS MUST BE PROTECTED IMMEDIATELY, AND LOGGING AND OTHER ACTIVITIES MUST BE EXPLICITLY EXCLUDED IN ROADLESS AREAS. Here's why: We do not know the effect of loss of biodiversity in these areas. We can make some pretty good claims about the effects of deforestation on water quality as well as loss of biodiversity. Until we can answer these concerns adequately, the best long-term alternative is to not disrupt these remaining natural systems in any way. (Individual, Waverly, IA - #1332.10100)

I support the immediate and permanent protection of all 60 million acres of the last unprotected wild forests found in our National Forest System, especially those in Alaska's Tongass Rainforest, from all logging and road building. These wild forests are important for biological and watershed protection, and they are also places for spiritual solitude and prayer. Once they are gone, they're gone forever. (Individual, Elma, NY - #50636.10100)

I write to IMPLORE you to extend the President's directives to include the Tongass with 60 million acres of roadless National Forest. (Individual, No Address - #44232.10110)

I support...much stronger roadless area protection than is currently provided for in the Roadless Area Conservation DEIS. Remaining roadless area regulations should be much the same as are currently applicable to Wilderness Areas. (Individual, No Address - #865.10110)

Public Concern: The final rule should assure that roadless areas are protected in perpetuity.

Keep roadless areas roadless in perpetuity! Repair/maintain existing park roads instead! (Individual, La Jolla, CA - #2152.71300)

As an American citizen who understands how our future economic prosperity entirely depends on the common sense of sustaining the earth's environment, I support the greatest possible amount of remaining roadless acreage to be protected in perpetuity. (Individual, North Bennington, VT - #16715.10100)

If it is to be roadless then prohibit any change of designation for say 200 years. (Individual, No Address, - #25308.64252)

Public Concern: The scope of the final rule should be broadened to meet the stated purpose and need.

You started this project off with a mandate from the President that would have allowed you to protect vast areas of our National Forest System unroaded lands, to preserve their unique characteristics over a long period of time. The Alternative that you have chosen does not reflect any portion of this vision. The result of your regulation will mean that MOST of the late-successional/old growth forest remaining on national forests would still be unprotected. You cannot successfully protect the tattered remains of the forest ecosystems that you administer by establishing a series of 5,000-acre islands amidst seas of clearcuts, and deforestation. Indicator species across the national forest system are in decline. You can only protect what remains on national forests by ending all destructive activities including logging, mining, and grazing in these last remaining wild areas. You have failed to meet the mandate of the President, you have failed to meet the stated purpose and need for this action. You should reissue a Draft EIS on this policy--one that actually takes a "hard-look" at what is necessary to protect these areas. (Environmental/Preservation Organization, Pasadena, CA - #29927.10110)

The scope of the study should be returned to the original 60 million [acres], no roads, no logging. (Individual, Olympia, WA - #538.64150)

I urge you to amend the draft plan for protecting our nation's forests. The draft plan fails to reflect the forest protection vision articulated by President Clinton last October and embraced by the public. It contains some glaring loopholes that leave millions of acres of forest wilderness vulnerable to logging and other destructive activities. While the draft plan would prohibit road building in roadless areas, it still allows logging in these areas. Timber companies are very adept at logging in roadless areas using helicopters, skid trails and other creative methods. Allowing logging in these areas, even while prohibiting roads, will not provide any real protection for the last of our wild forests. It is important to protect these irreplaceable lands as wild forests provide places to hike, camp, and fish for millions of Americans, habitat for wildlife and sources of clean water for communities. (Individual, Redwood City, CA - #4759.10110)

Logging will have the effect of reducing canopy cover in the stands, reducing canopy layering and vertical diversity and reducing the potential for snag and downed log recruitment in all size and age classes. Logging will have the effect of serving as a mechanism to promote insect outbreak...or to reduce resilience to insect outbreak.... This immediately contradicts the Forest Service's stated reason for carrying out the project described in the purpose and need by creating the opposite effect and contradicts the statements regarding the effects of managing and not managing. This points to three failures on the part of the agency: (1) The failure to describe a purpose and need to which the agency is responding. (2) The failure of the documentation to mention a single piece of this scientific evidence that contradicts the agency conclusions. (3) The failure, with a poor quality of scientific information and justifications, to acknowledge that any controversy around their conclusions exists. (Environmental/Preservation Organization, Weldon, CA - #16041.54100)

1.1.1.1 Access Considerations

Public Concern: 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.

I keep hearing folks say that the intent of the proposal is to “deny access.” I don’t see it that way. For example, here in Idaho there are already about 24,970 miles of forest roads in Idaho, and an additional 11,677 miles of motorized trails for dirt bikes and all-terrain vehicles. Nationwide the forest road system is some 380,000 miles in extent. The President’s proposal would not close any existing roads or motorized trails, or limit recreational access to our public forests. (Individual, Idaho Falls, ID - #6836.91000)

Opponents of the proposed policy assert that it will lock the public out of the forests, ban off road vehicle use, increase the threat of wildfire, degrade wildlife habitat, and threaten timber supplies. None of these claims is true. The proposed policy closes no roads. It bans no public uses of forests. (Environmental/Preservation Organization, Eugene, OR - #19306.10100)

Access is not a problem on the National Forests, due to 400,000 miles of roads which already exist. I use the National Forests extensively and while one can’t access every ridge and every tree from a vehicle, access is quite good. In some cases one might have [to] walk as far as five miles but usually much less than that. A recent study showed that the furthest point from a road was 20 miles. (Individual, Spokane, WA - #19743.10210)

Public Concern: The Forest Service should dismiss the “senior citizen and disabled access” argument against the proposed rule.

THE NEED FOR PRESERVATION OUTWEIGHS THE NEED TO PROVIDE ACCESS FOR THE ELDERLY AND/OR DISABLED

It is time for public lands to be preserved for future generations, even if this means limiting access to people like myself who have a disability and cannot hike (old polio) like they once managed to do. (Individual, Waynesville, NC - #1321.10213)

I cannot attend the Public Hearing on Roadless Areas in Grand Junction on June 27th because I am housebound in a back brace. I can no longer hike in roadless and wilderness areas but certainly do not want roads to be built for me. (Individual, Hotchkiss, CO - #6885.10110)

By the way, I am a physically disabled person who STILL prefers to walk in pain rather than pollute my outdoor experience with the noise & smell of ORVs. (Individual, Idaho Falls, ID - #18251.10213)

I am an older person, no longer able to get myself into remote regions on foot. It does not matter that I cannot personally enjoy roadless areas. Their existence is enough in themselves. (Individual, San Fidel, NM - #5122.90200)

IT IS NOT A VALID ARGUMENT

If I have a desire to take a motorized drive through some of our public lands, I have access to thousands of miles of federal, state, county, and Forest Service roads that traverse the same types of areas and geography that is proposed to be protected from further road building. I think the excuse of being denied access because of age or impairment is a weak one. (Individual, Preston, ID - #7648.10213)

On the forests that I frequent in Wyoming and Colorado, we already have too many roads. I cannot see how anyone, including the disabled, can claim that they do not have adequate access to our forest lands for recreation with the roads that we have now. (Individual, Laramie, WY - #17892.10110)

I think it's a big myth of the general public that people with disabilities are going to be locked out of wilderness if a road is not present. I like to think that where there's a will, there's a way. I for one can be very creative about coming up with ways for handicapped children to access roadless areas, wheelchairs or not. (Individual, Salt Lake City, UT - #21978.10100)

I'm...VERY tired of the old saw: "My mother (grandmother, whatever) can't get there unless I drive her." Too Bad! She should have thought of that while she could still use her feet, get off her duff, & WALK. I'm 80 years old & can still hike a mile or two & I DON'T want anybody MOTORING me into our forests. (Individual, Jerome, AZ - #13455.10213)

I would like to feel that, when the time comes, I will be gracious enough to say that I've had my turn and enjoyed it immensely. HOWEVER, I prefer to LEAVE THE SAME BEAUTY AND EXPERIENCE FOR OTHERS TO ENJOY AFTER ME, not to whine to have someone ruin more acreage just to get "me-me-me" up into the mountains. I feel that "senior citizen access" is a red herring, and a self-centered argument that should be dismissed as irrelevant to the conservation issue. (Individual, Buffalo, WY - #12161.10213)

The concern that full protection of roadless areas would deny seniors, families, and people with disabilities access to our public lands does not hold up to scrutiny nor does it represent our views. It is a concern more often raised by those who have a special interest in motorized access to our nation's wild areas rather than any interest in addressing the full range of accessibility issues that are of greater priority for people with disabilities. Currently people with disabilities are faced with numerous barriers because of the inaccessibility of facilities, accommodations, developed campsites, and the front-country trails enjoyed by most of the visitors to our national forests and other public lands. Similarly, motorized access in roadless areas itself would act as a barrier to persons whose disability stems from a sensitivity to pollutants or poor air quality. (Professional Society, Rockville, MD - #29109.10100)

1.1.2 Why the Forest Service Should Not Adopt a Roadless Area Conservation Rule

Respondents' arguments against the adoption of a Roadless Area Conservation Rule fall roughly into two categories: arguments which focus on the overall need for such a policy or advisability of limitations on management activities in roadless areas; and arguments which focus on the public's right to access National Forest System lands and growing frustration over what is perceived to be an ever-increasing number of restrictions.

With respect to the advisability of a national set of prohibitions, some respondents argue that this approach to roadless protection is unnecessary and is poor policy. Many feel that the detrimental effects of roads are greatly exaggerated, and that modern road building techniques are environmentally sound. Many others feel that there are already enough portions of National Forest System lands set aside under protective classifications, and thus a special designation for roadless areas is unneeded. Others claim that because many roadless areas are adjacent to designated wilderness areas, the proposed rule would not likely provide additional benefit. Further, opponents claim, many roadless areas have already been evaluated for and released from wilderness designation and thus have been determined to be more suitable for other purposes.

Many writers view national forests from a utilitarian perspective, and feel that the highest and best use for these forests is as a source of lumber and raw materials. Diseased and dying trees are therefore seen as wasted and lost to human use, or worse, a source of increased risk of catastrophic fire. "Given that inventoried roadless areas comprise more than twelve-percent of the 24 million acres of National Forest land in the Intermountain West that have been identified

to be at high risk of catastrophic fire, I am concerned that the rule as proposed may unwisely limit the agency's management options," remarks a concerned Minnesota resident. This is a view held by many opponents of the proposed rule. Many feel that the Forest Service has failed to adequately consider forest health issues in the Draft EIS, and cite the recent fires in Los Alamos and throughout the west as justification for this view. Many opponents of the rulemaking argue that actively managed forests are healthier than forests where natural processes are allowed to predominate. Many feel that implementing the proposed rule would only lead to more management problems than it would solve. The Forest Service should be able to adapt to changing circumstances, they believe, and this rulemaking could restrict agency personnel from being able to respond adequately to management needs in the future.

In short, opponents of the proposed rule argue both that neither is further protection warranted nor is it in the best interest of the land itself. Many respondents go on to question the stated purpose and need for such action and often express the belief that there are already enough laws and regulations in place to adequately protect roadless areas. For example, notes one writer, "All actions on national forest property are subject to the provisions of the National Environmental Policy Act, the Clean Water Act, the Endangered Species Act, and Section 106 of the National Historic Preservation Act." Adherence to these existing laws and regulations "would ensure continued environmental protection within the boundaries of national forests." Furthermore, people assert, roadless protection is an issue already addressed in forest plans; this rule, therefore, would only add another needless layer of bureaucracy to the whole system.

Opponents also claim that the Forest Service has failed to identify a compelling need to limit certain activities. "A statement that certain activities *can* degrade certain characteristics," asserts one writer, "does not represent a compelling need to limit these actions." Opponents write, further, that the proposed rule won't really solve any problems. Humans are part of the environment, these writers note, and it is naïve and unrealistic to think we can "revert to what America was like in pre-Columbian times." Some writers believe that the Forest Service faces more pressing management issues than roadless areas and suggest that the agency focus its resources on other priorities.

One major reason cited by many respondents for their opposition to the proposed rule is the belief that it will limit access to public land. They claim that the American people are entitled to reasonable access; that this rule will affect access to places that have been historically accessible by road, that it will cut off access to adjacent lands, or that it will deprive future generations of use of the national forests. Opponents also claim that the proposed rule will limit access for recreation and for the elderly, the disabled, and virtually all persons who are not wealthy. As one writer argues, "Only the wealthy can afford the gear, professional guides and outfitters, horses, and even time required for forays into wilderness. Otherwise one must be young, healthy and unencumbered by family to make backpacking an option." In either case, this writer concludes, "The vast majority of us are denied access to anything but the perimeter of wilderness areas."

Many opponents express significant misgivings regarding the current direction of policy-making at the national level by the Forest Service. Many simply feel that forest management decisions are most appropriately made at the local level by decision-makers using site-specific information. However, many others express strong distrust in the federal government and

believe that the real intent of this and other recent proposals is to deny American citizens legitimate access to public lands. While not all opponents see a sinister motive, most opponents of the proposed rule are concerned about access and many insist in unequivocal terms that as taxpaying citizens they have a right to access these lands which neither the federal government nor the Forest Service may infringe upon. It should be noted that some of the most emotionally-laden responses in opposition to the proposed rule are those which focus on the public's right to access. The fear that access may be curtailed elicits an intense reaction many citizens, self-identified motorized users in particular. Many opponents of the rule frame their opinions in the context of the principles of individualism and freedom they feel are enshrined in the Constitution of the United States.

Public Concern: The Forest Service should not adopt a Roadless Area Conservation Rule.

I'm opposed to the President's roadless initiative because it bypasses the local forest planning process and eliminates/reduces recreational use of the forest by the public (except for the FEW hikers/backpackers). In a time when we should be MANAGING our forest resource for multiple uses, this policy proposes to lock up additional land, effectively creating additional wilderness. This flies in the face of the laws which govern our National Forest Management. (Individual, Hotsprings, VA - #1224.10220)

And as a State Land Board commissioner for the past ten years, I have learned a fair amount about the management of forests, forest ecosystems and forest life cycles. I pride myself on keeping abreast of the issues affecting Idaho's natural resources and environment. When I learned of the proposal to set aside approximately 9 million acres of Idaho's forest, I was very concerned. My first priority has always been with preserving the livelihoods of the working families. However, this was not my only worry. I was also concerned about our nation's need to preserve beautiful wilderness areas. However, after reviewing the plan, I determined the potential negative impacts that would ensue are obvious and far reaching, particularly for Idaho. This action is contrary to sound forest management and practices and it is monumental policy shift from current procedures without proper due process. It jeopardizes the economy of working families and places millions of acres of Idaho's forest at risk of catastrophic fire. As a western state, Idaho is impaired by the percentage of land owned by the federal government. (Individual, No Address - #21156.10200)

I am opposed to the roadless Draft EIS. I think these public lands should be available for use by vehicle, both logging and recreation. This is a land grab that far exceeds the need to keep America's taxpayer-owned lands pristine and undisturbed. Please, do not adopt this plan. Leave things the way they are now. (Individual, San Antonio, TX - #2206.10200)

MODERN ROADBUILDING IS NOT HARMFUL TO THE ENVIRONMENT

Modern road building techniques do not damage our forests. Research not only shows the new roads are better but also benefit both the ecosystem and those who use them. (Individual, Spokane, WA - #3293.10200)

Roads have been and can continue to be constructed and maintained in a manner to reduce or eliminate any measurable effects to water quality. (Individual, Lake George, MN - #2209.10200)

THERE IS ALREADY ENOUGH DESIGNATED WILDERNESS AND PROTECTED LAND

Most of the roadless areas are adjacent to existing Congressionally Designated Wildernesses. Not building more roads into these areas or maintaining existing roads will not have many benefits that aren't already present due to the established Wildernesses. Wildlife habitat requiring no roads, solitude for people, and natural areas are present in sufficient amounts within the existing designated Wilderness areas and the network of Research Natural Areas. (Individual, Lake George, MN - #2209.10200)

Nobody gains by locking anybody out. We have enough wilderness areas, and ending road building is not going to solve anything. Whether we like it or not, man is a part of the environment. Environmentalists believe that by restricting access, we can revert to what America was like in Pre-Columbian times. This is naïve and unrealistic. I firmly believe [there] is nothing wrong with the current policy. (Individual, No Address - #207.10200)

SOCIETY SHOULD MAKE USE OF RENEWABLE TIMBER RESOURCES RATHER THAN ALLOW THEM TO BE WASTED

It seems ludicrous to me to even contemplate the thought that the resource these dead trees represent might be wasted. (Individual, Manti, UT - #44314.10200)

The forests need to be managed and logged. We have dead & dying trees from disease & insects & a threat of fire is just waiting to happen. We already have many miles of forest roads gated and closed to vehicles. We had a ballot poll on the Roadless issue and nearly 16,000 people said “NO” to federal forest policies. (Individual, Columbia Falls, MT - #13350.10200)

We as taxpayers and users of national forests are convinced that trees are a renewable resource. The Forest Service Roadless Area Conservation Draft EIS and proposed rule doesn't address this. Trees are going to die whether we log or let nature take its course.

In your report to the public why are we not told what the future will bring to the unroaded areas? With many of these areas having as many as 1000 trees to the acre, they are not suitable wildlife habitat, and the trees are too close together for people to walk through. People should also be informed that this land is not growing marketable timber. The trees are subject to premature death from insects, disease, and catastrophic fire when there are too many stems per acre. When trees are killed by fire or pine beetles, all the trees in the area are the same age again, with too many stems per acre, growing less desirable trees and then this useless cycle starts all over again. (Individual, Omak, WA - #1065.10200)

ACCESS IS NEEDED TO REDUCE FIRE HAZARD

Given that inventoried roadless areas comprise more than twelve-percent of the 24 million acres of National Forest land in the Intermountain West that have been identified to be at high risk of catastrophic fire, I am concerned that the rule as proposed may unwisely limit the agency's management options. Certainly, there are times and places where the necessary management actions, such as thinning or prescribed burns, can be accomplished through means that do not require temporary road construction. However, if constructing a temporary road is the only viable means to restore healthy forest conditions, the agency should do so. Of course, such roads should be constructed so as to avoid or minimize to the maximum extent possible any adverse environmental impacts and should be immediately obliterated, re-contoured and re-vegetated upon cessation of needed management activities. (Individual, Northfield, MN - #12976.10211)

In September 1998 the General Accounting Office testified before the House Resources Committee on forest health that 31 million acres of Forest Service land east of the Cascade Range were in imminent danger of catastrophic fire, while adjacent private timberland did not pose such a threat. The reason given was lack of harvest and lack of roads on the federal lands. (Individual, Coos Bay, OR - #1710.10200)

The Forest Service mission, caring for the land and serving the people. Does this policy really do that? Can we really care for the land as stewards if we can't even access it, if we can't get to it? Forest Service maps show that millions of acres in Montana are at risk to catastrophic fire because they're infested with insects and disease. Many of these same lands are in roadless areas, and we're not going to be able to manage them. (Timber Association, Helena, MT - #11165.10210)

Many of the roadless areas are primed for catastrophic fires. One of the best tools to reduce those hazards is carefully designed timber harvest. By eliminating all possibility of roads, even temporary ones, this tool is effectively lost to managers. Helicopters logging sounds good, but isn't economically feasible in most situations. Modern logging equipment can reach the most remote areas with a minimum of impact on the land and few roads. A minimal road system provides access for management, facilitating actions to assure healthy forests, such as well managed prescribed fire. Under current forest conditions, following years of fire suppression, many of our

unmanaged wildlands are doomed to experience catastrophic fires, such as the Los Alamos fiasco. These fires can spread into surrounding managed forests, private property and communities. This rulemaking and DEIS fail to adequately address this important issue. Los Alamos was a wake-up call they had best heed. (Individual, Colorado Springs, CO - #59459.90000)

ACCOMMODATE ACTIVE MANAGEMENT OF FOREST HEALTH FOR LONG-TERM BENEFIT

The impracticality and conflicts created by wilderness and roadless designations in western South Dakota have already been demonstrated many times:

- Because of wilderness management restrictions, the Norbeck Wildlife Preserve has become so overgrown that it no longer provides good wildlife habitat.
- Because of wilderness management restrictions, materials to rebuild the Harney Peak fire lookout had to be hauled up on pack animals. Quaint, but hardly efficient. This could have been handled more efficiently--and with less physical impact--if 4-wheel drive trucks, a skycrane helicopter or power tools could have been employed.
- because of wilderness management restrictions, an infestation of thistles in the Badlands' Sage Creek Wilderness Area now is spreading to private neighbors.
- New federal criteria protecting dead snags from firewood cutters seems to go way beyond the real need to preserve some snags for wildlife habitat. (Business/Business Association, Rapid City, SD - #7865.10211)

As with anything, there needs to be a balance. We need set-asides, and we need ECO-SYSTEM based managed forests. If we can get main-stream commercial tree-farmers (G.P. and Weyerhaeuser) to manage in an eco-system based manner (such as Collins Pine), we would have a larger base of NATURAL forests, which would continue to evolve over time. And if we had a large base of naturally based forests, we would not need as much set-aside. In other words, sustainable harvesting and roadless areas work hand in hand for both maintaining a sufficient lumber supply and maintaining a natural state of healthy forests. (Individual, No Address - #43650.22200)

I don't believe that not putting in roads, banning motor vehicles and stopping the timber industry from all logging will save the forests in the long run. (Individual, No Address - #3957.10200)

Modern forest management needs to be flexible and dynamic. It needs to be able to adapt to change. I think the blowdown crisis on the Superior should demonstrate that to us all. When management is restricted, options are simply lost. When options are lost, the ability to meet objectives are lost. When that happens, the fate of management is lost to a law in a book with no ability to adapt or respond. At that point, we have all lost, no matter what our values and objectives might be. For this reason, I do not support any regulation which generically restricts forest management. (Individual, International Falls, MN - #22589.10211)

We are concerned by risks of unnatural fire and erosion threatening the National Forests, and we are disturbed by the gridlock in our community that prevents professional foresters, wildlife biologists, and other specialists from doing their jobs. In Idaho, 3.7 million acres of roadless forests are at risk to catastrophic wildfire. Signs of neglect are becoming evident in the forest as they become choked with too many of the wrong kind of trees, increasing the risk of dangerous wildfires. (Business, Coeur D'Alene, ID - #43175.10200)

This Proposed Rule would virtually eliminate the opportunity to carry out important forest and wildlife habitat management by prohibiting roaded access to over 179,000 acres of National Forest land in West Virginia. (Environmental/Preservation Organization, Beckley, WV - #43408.10210)

Public Concern: The Forest Service has failed to identify a compelling purpose and need to adequately justify the proposed action.

The statement that: "Road construction, reconstruction and timber harvest activities CAN DEGRADE the characteristics of IRA's" is true. "Can" being the operative word; these same activities CAN ENHANCE the characteristics of IRA's in many circumstances. A statement that certain activities CAN degrade certain characteristics does not represent a compelling need to limit these actions. (Wise Use Organization, Salt Lake City, UT - #16190.10200)

Failure to adequately consider forest health issues calls into question the purpose and need for the proposed action. How can the Forest Service seriously identify the purpose and need to protect roadless areas without considering the likely possibility that they will burn up? (Timber Association, Eugene, OR - #14879.55200)

I attended one of your informational meetings. During that presentation I was told that in the last five years we have lost 16 million acres of open lands to urban development. Number one on your list of lost land was "cropland." How much cropland is publicly owned? Cropland is owned by farmers. Remove cropland from your equation and your number one reason for this proposal is gone. (Individual, Sumpter, OR - #2735.10200)

On the Clearwater National Forest, over 250,000 acres are managed as Wilderness and almost an additional one million acres are classified as inventoried roadless areas. If all the inventoried roadless areas on the Clearwater were to be left roadless, this would mean that 70% of the Clearwater NF would remain roadless. Over the past 13 years, only 1.6% of the inventoried roadless areas have been developed. Currently, a moratorium is in place preventing any further road building in roadless areas. On the Clearwater NF, there is absolutely no threat to develop roadless areas and any attempt to pass any further restrictions is completely unnecessary. (Business/Business Association, Princeton, ID - #417.10220)

The benefits of road prohibition to the water quality of streams serving as municipal water sources are exaggerated. When compared to private lands, there is not enough difference in drinking water quality from a managed forested watershed versus a roadless forested watershed to justify the extreme approach of a NATIONAL roadless policy. A more balanced review of effects would lend greater credibility to the EIS. The section on Recreation, Scenic Quality, Wilderness, and Recreation Special Uses (pages 3-166 to 3-172) provides an example of a balanced, detailed analysis. (State Agency, Social Circle, GA - #13974.83140)

Page 3-15 cites the clean Water Action Plan (CWAP) as one of the reasons for initiating this roadless policy. The use of the CWAP as a guideline is inappropriate and in violation of the National Environmental Policy Act (NEPA). The CWAP represents a significant Federal action that requires an EA or full EIS under NEPA, and these have not been completed. Use of the CWAP as a guideline should be held up until a judgment has been rendered in the lawsuit filed against its implementation and its impacts have been analyzed under NEPA. (Individual, Carlsbad, NM - #53453.54100)

I would like the Forest Service to eliminate the current plan and devise another one. The new plan should include methods to evaluate the significance of roads for recreational uses, fire protection, fuel removal, emergency access, and well-founded forest management. (Individual, Houston, TX - #17435.60000)

Public Concern: The Forest Service should abandon the rulemaking because existing laws and regulations already provide adequate protection for roadless areas.

We all know that there are enough laws on record currently to protect the area from devastation. We need the flexibility to use the resources available if needed. (Individual, Whitehall, MT - #2333.10220)

I was told that the purpose of this Proposal is "no new roads." The government already has plenty of rules and regulations that would prevent road building on public land. So we don't need this proposal unless, of course, we are not being told the whole truth. (Individual, Sumpter, OR - #2735.10200)

We believe additional rulemaking would be redundant and unnecessarily burdensome because there are existing laws and regulations to address the environmental protection of roadless areas in the National Forest System. All actions on national forest property are subject to the provisions of the National Environmental Policy Act, the Clean Water Act, the Endangered Species Act, and Section 106 of the National Historic Preservation Act, and the implementing regulations of each of these laws. Strict adherence to these existing laws and regulations would ensure continued environmental protection within the boundaries of national forests. (State Agency, Richmond, VA - #87.54000)

Close to ½ of all the roads in the Umatilla Forest have been closed already under the existing forest plan. The Forest Service has the power already to require that any logging that takes place be done by air--resulting in no new roads. If the stated objective of this “rule” is truly no new roads, then we already have laws and rules in place to take care of this. (Individual, Sumpter, OR - #2749.10220)

This proposal is redundant, the current Forest Plan already addresses these issues and this will just add another layer of bureaucracy. It would supercede the current plan, which establishes criteria and procedures to ensure social and ecological values of inventoried and uninventoried roadless lands are considered and protected. (Individual, Orofino, ID - #3589.10220)

The management areas already in use provide planners with adequate tools to protect roadless areas without any of the proposed rule’s restrictions. The net effect of the proposed rule will be a reduction of land available for timber harvest when in fact this may not be in the best interest of balanced use. The land under consideration has already been evaluated for and released from Wilderness designation. (Individual, Weston, WA - #1340.10200)

What will be gained by the Roadless Area Conservation that is not already being accomplished by the current environmental statutes? The preservation of clean drinking water sources is being accomplished with the Clean Water Act. Providing habitat for rare plants and animals is already being done through the Endangered Species Act. The preservation of landscapes can be achieved through proper land use management plans. Why does the government feel the need to impose further restrictions on public lands? Why can’t the current environmental statutes already in place be used to accomplish these goals? (Individual, Challis, ID - #7265.10220)

Public Concern: The Forest Service should prioritize more pressing issues than the protection of roadless areas.

We as snowmobilers believe that there are other issues that the Forest Service needs to address instead of attempting to lock up the roads of the forest. Fire management, diversified recreation management, stream and river management and cave management to name a few. (Recreational Organization, La Pine, OR - #6739.10200)

1.1.2.1 Access Considerations

Public Concern: The Forest Service should not restrict public access.

Until we have more level headed and realistic leadership from our federal government, the status quo is bad enough. We need no more restrictions on forest access until such time as a fair and equitable discussion of the issues that involves everyone, not just the environmental left, can occur. (Individual, No Address - #474.10200)

We believe that the American people are entitled to reasonable access to their national forests, regardless of the management prescription assigned to the land within the forest boundary. After all, even Designated Wilderness, the most restrictive of prescriptions, includes the direction that Wilderness Areas shall be managed for the use and enjoyment of the American people. We also believe it is the responsibility of your agency to provide that reasonable access, and to discourage exclusive use of our national forests. (Wise Use Organization, Billings, MT - #3830.10210)

I object to the proposed Forest Service Roadless Area Conservation plan that allows the Forest Service to continue to build new roads and use existing roads for logging yet denies the public access to the roads. (Individual, Noxon, MT - #3406.10210)

This decree would affect the public access to areas that have been accessible by existing roads for over a century. (Individual, Las Vegas, NV - #926.10210)

This new proposal will not only lock [up] unroaded wilderness but there will be adjacent land that will not be accessible even though it is not classified as roadless wilderness. (Individual, Spearfish, SD - #1609.10210)

Maybe what you do not realize is that the road system is exactly what has allowed the people to have access to the forests they love and use. Locking up more areas with no new roads will deprive future generations of the opportunity to enjoy and use the forests. (Individual, Grants Pass, OR - #1714.10212)

FOR RECREATION

I do not support any plan that reduces even by one foot the number of miles of recreational trails open to mechanized travel (including motorcycles and bicycles) in our national forests. In fact, I strongly suggest that you increase the number of miles available to mechanized travel. (Individual, Boise, ID - #29245.10200)

I am writing to you for your support in blocking Clinton's Roadless Highway bill. This bill is unlawful to the citizens of these United States and would deny families the privilege of utilizing our national lands for off-highway vehicles. As we all know our lands must be kept pristine in order to preserve them so generations following us may also enjoy their use. People now using this land are fully aware of the consequences and strive to take the utmost care when using these parks and forests. I urge you to think it through and do the right thing. Please do not back this travesty. The citizens of the United States deserve to be able to carefully utilize their land and parks. (Individual, No Address - #340.10200)

FOR THE ELDERLY, DISABLED, AND ALL BUT THE WEALTHY

This will severely restrict access for the elderly and handicapped. (Individual, Casper, WY - #43176.10200)

I am against the Roadless Area Conservation Proposal. It is unfair to many because of age or disability, they won't have access to these areas. (Individual, Tucson, AZ - #13835.10213)

If there are no roads or off road motorized accessible trails anywhere in the forests, and existing logging roads are closed to motorized travel, I, and a great majority of older U.S. citizens will never be able to enjoy those lands, as has been our traditional right, lands that we are joint owners of. (Individual, Blaine, WA - #28090.10210)

Page S-38 states that people with disabilities could use guides and outfitters to access these areas if alternative 2, 3, or 4 was chosen. This discriminates against low income people with disabilities who cannot afford to hire guides and outfitters. These alternatives also discriminate against native American elders who are traditional healers. They will not be able to collect traditional culture non-timber forest products because of the difficulty of walking long distances. (Timber Company, St. Maries, ID - #28102.10213)

Instances of exploitation should be curbed by law but creating more wilderness areas effectively denies access to some of our most scenic land to most of us (which is the obvious Clinton administration agenda). This is self-evident if one considers the implications of venturing into wild and primitive country. Only the wealthy can afford the gear, professional guides/outfitters, horses and even time required for forays into wilderness. Otherwise one must be young, healthy and unencumbered by family to make backpacking an option. Either way the vast majority of us are denied access to anything but the perimeter of wilderness areas. (Individual, No Address - #2232.10210)

I live in Wyoming where you would think that I have unlimited access to our public lands. However with each year that passes, I find fewer and fewer access routes to the Forest. The reason is private landowners are shutting down access across their lands and the Forest Service continues to shut down existing roads. The Forest Service should be buying access routes and building new roads on the Forest to replace the private access routes that are being closed. Instead, you are proposing that no new roads will be constructed. At the rate this trend toward no access is progressing, it will only be a matter of one generation and the rich will have the Forest as a playground because their lands adjoin the Forest and the rest of us will be restricted to a few existing corridors. (Individual, Cody, WY - #43831.10200)

The forests are not a park or playground for the elite. Access and use should be broadly permitted, with a modest number of exceptions. Please get back to SERVING the ordinary people, such as ranchers, lumber workers, sportsmen--not the elite and big money easterners. (Individual, Broomfield, CO - #1611.10200)

FOR TAXPAYING CITIZENS

I am very angry with Clinton's legacy locking up all our roadless areas and national forests. All citizens have the right to log, use vehicles on the land, hunt and fish, and homestead on the land, and gather edibles, and go out target shooting and whatever. (Individual, Missoula, MT - #43391.10200)

This Roadless Area Proposal is invading our rights as citizens of the USA, this is public land which means it should be for all citizens to use and for the benefit of all people, not the select few who think it is not to be used at all. (Individual, No Address - #25640.10210)

US Forest & Federal lands should be kept open to the public as they are paid for by the people through taxes. (Individual, Kiel, WI - #19365.10200)

As an AMERICAN TAXPAYER, I am furious about the Roadless Area Conservation Proposed Rule. How dare you try to make roadless areas when the American Public pays for public lands with tax dollars. We the public, have paid your salaries while you dream up ways to keep us off our public lands. (Individual, No Address - #28122.10210)

Public Concern: The proposed rule will deny the American people legitimate access to their public lands.

The Roadless Initiative combined with the Transportation Plan and the revised Forest Planning Rules is just a part of a bigger plan to deny the American people legitimate access to the lands they own. (Individual, Las Vegas, NV - #8925.72200)

The U.S. Constitution severely restricts the government ownership of land. That being the case, the federal government has no authority to deny the use of public lands to the people of this nation. (Individual, Wolcottville, IN - #13768.10200)

As OHV enthusiasts I consider my wife and myself to be the true environmentalists in this struggle to keep our public lands open. We crave the beauty of the lands God and our forefathers have provided us. We demand the right to enjoy them without Big Brother and the environmental elitists controlling our access to & the enjoyment of what we have rightfully earned under the Constitution of the United States. You must stop the enactment of unjust rules and restrictions through executive orders and the whims of those that would restrict access to themselves and their ilk. This circumvents due process which our founding fathers have fought and died for. We will not be deterred. (Individual, Corpus Christi, TX - #8254.10210)

My friends, neighbors, and myself are vigorously opposed to this further incursion into the rights and welfare of the American citizenry. It is a scheme to exclude rightful entry into federally owned (our) forests and multiple use of an immense and now virtually unmanaged resource. (Individual, Chehalis, WA - #25907.10200)

Stop closing the roads. As a taxpaying citizen of the United States of America I deserve access to my country. If you want to deny access of the wilderness and federal parks land to anyone deny it to foreigners. Not the citizenry of this country. Do not let foreign interests buy it up. Do not let developers buy it up. The federal government was only ever meant to be the custodians of our public lands not the dictators thereof. (Individual, No Address - #7660.41500)

1.2 The Mission and Guiding Policy of the Forest Service

This section addresses a number of general concerns respondents raise regarding the mission and guiding policy of the Forest Service. Some discuss public land management in general while others address roadless areas in particular. Concerns are organized in the following subsections: 1.2.1 Clarification of the Forest Service's Mission; 1.2.2 National Forest System Lands Management and Environmental Protection; and 1.2.3 Multiple Use Management.

1.2.1 Clarification of the Forest Service Mission

Some writers believe that the Forest Service needs to clarify its mission as it enters the 21st century: whether the agency's purpose is to maintain a timber supply to serve the needs of private business, or to preserve a broad array of ecosystem values. "In my opinion, today, the USFS is an agency that is largely floundering to find its way back to a meaningful mission. . . . The USFS has gotten itself into the hot seat it is stuck with today because past leaders of the agency failed to have any vision for the future. I believe the Roadless Area Rulemaking process, if it results in long-term conservation of roadless areas, will ultimately bring the agency back to the stewardship role it once played in this country," concludes one individual. With respect to the rulemaking, other writers request that the Forest Service more clearly articulate the overarching goal of the proposed action. Without clear understanding of the long-term objective of this proposal, these writers maintain, they are not in a position to support it. Many provide their own suggestions as to the appropriate goal of the rulemaking, with some proponents advocating that the agency take action to increase the effective size of wilderness, wildlife corridors and core habitat conservation areas. Others consider that the central role of the Forest Service should be to provide dispersed and primitive non-motorized recreation; to this end, greater protection of roadless areas is necessary.

Public Concern: The Forest Service should clarify its mission as a public land steward for the next century.

I want to applaud you on your vision for the Forest Service in the 21st century. I'm writing this letter in support of President Clinton's initiative to protect wild forests and I'm sure it is a tall order in light of the past mission of the Forest Service for the last 100 years. (Individual, McMinnville, OR - #1847.10100)

The Forest Service has long been confused about its mission. Is its purpose to upkeep a large farm of trees for America's business interests, or to preserve wild land and its many benefits (water, wildlife, etc.) for future generations? (Individual, Portland, OR - #3691.20000)

Forty years of USFS "multiple-use" management (which never was much more than federally subsidized logging, mining and grazing) has pretty much gotten the Forest Service to where it is today. In my opinion, today, the USFS is an agency that is largely floundering to find its way back to a meaningful mission. The days of punching new roads into pristine country is over and everybody knows that. The buffalo won't be coming back and neither will the days of aggressive timber harvests and new roads. Unfortunately, over the last forty years some communities have come to expect unrealistic levels of timber harvest from our USFS lands, which simply can't be reasonably sustained at the past level. The USFS has gotten itself into the hot seat it is stuck with today because past leaders of the agency failed to have any vision for the future. I believe the Roadless Area Rulemaking process, if it results in long-term conservation of roadless areas, will ultimately bring the agency back to the stewardship role it once played in this country. Commercial logging and grazing will always have a place in National Forests, I hope.

However, roadless areas have become a more valuable commodity, IN AND OF THEMSELVES, than they will ever be able to give this country in board feet, AUMs, or minerals. The value of these areas as wildlife habitat and as places where people can go to escape our ever-growing society will continue to increase. Over the last 15 years or so Americans on both sides of this issue may have temporarily lost their respect for the USFS, but they still love the National Forests. (Individual, Helena, MT - #1229.10110)

Public Concern: The Forest Service should clearly state the overarching goal of the proposed rule.

I think the following question is critical and needs to be answered, yet the subject is never even mentioned in the DEIS. What is the goal? I mean the ultimate, overarching goal? Claims are made in the DEIS that resources need to be protected. The authors make it clear that this means from people because human activities are what is depicted as bad. Well, we now have 104 million acres “preserved” as Wilderness Areas, which apparently is not enough. The proposed action will add another 54 million acres of wilderness-like restrictions. Even that is not enough because the proposed action will also add undisclosed “unroaded areas” with wilderness-like restrictions. So how much is enough? The entire North American continent? That’s not going to happen. As the DEIS states, the areas targeted by the proposed action are disproportionately in the west and represent relatively few types of ecosystems. So what is the long-term large objective this action supports? I want to know before I will support it. (Individual, Fort Collins, CO - #19429.33100)

We request that the Forest Service revise and reissue a draft Strategic Plan that is comprehensive in scope, prior to closing the public comment period of any proposed rulemakings or policies. The revision plan should include a comprehensive mission statement, general and outcome-related goals and objectives, and various descriptions and evaluations designed to clarify the long-term goals for implementing the agency’s mission, including the resources needed to reach these goals. This revised plan will allow forestry professionals and the public to understand how these various proposals might effect the agency’s goals and objectives, the sequence in which they will be adopted, how they relate to each other, and how much they will cost. (Professional Society, Portland, OR - #29752.70000)

Public Concern: The goal of the proposed rule should be to increase the effective size of wilderness and core habitat conservation areas.

Increasing the “effective size” of wilderness and “core” habitat conservation areas should be a major goal of the rulemaking process. It is no coincidence that IRA’s are found near/adjacent to currently protected areas. Areas need to be considered as to how they complement each other and what ecotypes they encompass, not just how much acreage they contain. (Individual, Leavenworth, WA - #15897.71120)

If biodiversity and ecological integrity are characteristics of roadless areas that are to be sustained for the long term, then the core habitat found within roadless areas, free of exotic invasion, roads and mechanized disturbance, must be permanently and effectively protected. In summary, we have learned from the scientific studies of Island Biogeography and Conservation Biology the importance of maximizing the size and integrity of roadless areas, which serve as core habitat for native species and as bulwarks against the spread of exotic species. Further study of terrestrial ecosystems has revealed that protecting and restoring connectivity between roadless areas is the key to sustaining biodiversity and ecological integrity for the long term. (Environmental/Preservation Organization, Albuquerque, NM - #43737.80000)

As you are well aware, the roadless areas of our forests are a small percentage of the total National Forest areas, and the National Forests themselves are a small percentage of the land area of the U.S. Thus, even combined with the National Parks, only a very small proportion of our once extensive wilderness area is relatively free from human impact. These small, often disconnected areas are all that is left to provide wildlife habitat, natural, undisturbed scientific study areas, critical ecosystem functions, and a living legacy of our nation’s natural heritage. (Individual, Ashland, OR - #8279.83000)

Public Concern: The Forest Service should recognize that its central role is to provide dispersed and primitive backcountry recreation.

The Forest Service must recognize the obvious, that the central role of the Forest Service is to provide dispersed and primitive recreation to the American People. (Individual, Walhalla, WA - #10891.41200)

I am writing in favor of the Roadless Area Conservation Proposed Rule that would protect important undeveloped areas in the National Forests. We have used these areas for recreation (hiking, cross-country skiing, etc.) and especially value their undeveloped state. Nowhere else can you appreciate the beauty and serenity of the wilderness. (Individual, No Address - #1591.10100)

1.2.2 National Forest System Lands Management and Environmental Protection

Many respondents favoring the proposed rule contend that today's forest management should emphasize environmental protection. Some suggest that national forests be managed like national parks, thereby protecting old growth and encouraging dispersed low-impact forms of recreation. One person suggests the Forest Service follow the example of Isle Royale in preserving national parks as "islands of wilderness" which are open mainly to walking. This respondent represents the confusion a number of persons have over the various jurisdictions of public lands; but the person's point nevertheless is that some areas deserve stronger protection than they are presently receiving. Many opponents of the proposed rule contest this, and note that Congress established quite distinct public land management agencies in order to meet different goals. The differing management regimes of each agency should be maintained rather than blurred, many assert. Some continue to state that commodities extraction and watershed protection are the two uses of national forests specified in the enabling legislation of the agency, and should still take precedence. A few recreationists object to the increasingly controlled and sanitized visitor experience found in many National Parks, and urge the Forest Service to continue providing the public as unregulated a backcountry experience as possible.

Proponents of a roadless area conservation rule feel that the agency in the past has not adequately considered ecological science and research in its management decisions. Scientifically sound decision-making, they say, is necessary to maintain the complexities and interrelationships within forest systems. To this end, respondents often emphasize the need to protect whole ecosystems. As one writer puts it, "Economic and so-called recreational considerations must...bow to the health and sustainability of forest ecosystems at large." Another writes, "The health of our forests, animals and watersheds must be a priority for the Forest Service." Some comment that the Forest Service should continue with its current Natural Resource Agenda. Finally, many respondents believe the proposed rule should be based on what's good for both the environment and the economy, and this, they believe, is greater protection of roadless areas. Some also remark that the Forest Service should promote wise management on forests internationally. Finally, some suggest that future forest management should focus on habitat restoration activities. "We need to establish a policy that allows us to fix our past problems instead of just creating new ones," asserts one respondent, a concern echoed by many proponents of roadless area conservation.

Public Concern: The Forest Service should consider whether National Forest System lands should be managed like national parks.

MANAGE SIMILAR TO NATIONAL PARKS

I think the management of our national forests should approach that management that we see with respect to the national parks. That is, these wilderness areas are sanctuaries, and violations of such should be minimal. We do certainly want to enjoy them in forms of acceptable recreation. We can define such recreation in terms of walking, camping, hiking, sightseeing, photography, peace and quiet, escape-from-the-city, solitude, study, reflection, aesthetic enjoyment, and even in the knowing that the deep forests still exist somewhere. There is a definite distinction in the classifications outlined above. Many people don't see this distinction and the debate just gets confused and the issue historically had difficulty in getting sorted out. I've seen people in Michigan look around and say there are plenty of woods around and what is the problem? But, of course, it is not this woods or plantation classification that we seek to protect. It is the unequivocally old-growth forest and other pristine wilderness areas that are now scarce. Many of these areas are already in national parks. In the national forests there exist such old-growth areas, too. However, most have already been cut and destroyed since the Forest Service has pursued a road-building and extraction policy, unlike the National Park Service. We seek to prevent this destruction on those remaining pockets of forest within the national forest lands. All I ask is that the Forest Service throw out the term "timber" as it no longer applies to the lands over which the Forest Service controls. This term should be relegated to the plantations. (Individual, Belding, MI - #2886.22000)

With national parks, I think decisions can and should be made clearly in favor of preservation and conservation. Let people adapt to what the park itself needs, so that the park is preserved. Isle Royale is maybe a good model of what a national park should be like, and we need to take steps in the other parks to make them similar islands of wilderness, open mainly to walking. (Individual, Allentown, PA - #2976.23000)

DO NOT MANAGE SIMILAR TO NATIONAL PARKS

Finally I feel that our national forests are & have been well managed. They should continue to be managed for the basic purposes outlined by Congress in the Forest Service's enabling legislation: timber and watershed protection. We have national parks for preservation. (Individual, Norris, TN - #11633.22000)

This Administration's desire to preserve a majority of the National Forest System for primitive recreation and for the elements of biological diversity found in older growth forests (SEE 65 Fed. Reg. 30276) blurs the distinction between the National Forest System (which is to be managed for multiple uses, including timber) and conservation-orientations like the National Park System and the National Wildlife Refuge System. Even if the Forest Service had the legal authority to change the orientation of the National Forest System (which it does not), the blurring of roles makes it more likely that the Forest Service will lose its land base and have the conservation-oriented areas transferred to the National Park Service or U.S. Fish and Wildlife Service. (Timber Association, Eugene, OR - #15879.21200)

With the rapid growth in designated Wilderness proposals, the President's rash of unilateral National Monument designations and the "aggressive decommissioning" of roads that this alternative advocates, the principle visitors to NFS lands will be concentrated into very small, highly sanitized areas with little opportunity for any true backcountry experiences. This is the path the National Park Service appears to be following at many of their public land areas and is often employed by commercial parks where all the visitors are herded into small enclave and toured through select areas by tram. We believe that, while that approach may have its place, our NFS managed lands deserve to be fully experienced and enjoyed by responsible recreationists. (Individual, Beaumont, TX - 50613.21400)

Public Concern: The Forest Service should rely on sound science in its management of National Forest System lands.

There is such a great need for scientific study of our grand forests in order to have a better understanding of its complexities and interrelationships--so that we (Forest Service) can make adequate decisions in its use. Certainly, any policies to be incorporated today, should be solely based on our current scientific knowledge. (Individual, McMinnville, OR - #1847.22000)

Please adopt a policy that relies on scientific study, not politics, to set policy. (Individual, No Address - #2215.23000)

The negative impacts and irreversible commitment of resources through errant practices of the past are forcing us to adopt new management techniques based on the best science available. Roadless conservation will provide the control element required for developing future scientific management methods. (Individual, Klamath Falls, OR - #17583.10100)

I support the proposed initiative and believe that it is based on sound science and will also greatly benefit the U.S. public as well as our nation's water quality and national forests. (Individual, Houghton, MI - #993.10100)

Public Concern: The Forest Service should give environmental and recreational uses of National Forest System lands the same consideration as commodities uses.

We realize this is a giant step for the Forest Service, but it is time to start placing environmental and recreational uses of our forest on the same playing field with timbering. (Individual, Dunwoody, GA - #1322.20000)

All too often, the Forest Service, and other government agencies, are far too condescending with the large timber, ranching, and mining corporations at the expense of the American public, and lesser animal life that is forced out of their habitat as the timber companies clear-cut our old growth forests and hasten the loss of topsoil by the action of erosion. Mining companies extracting petroleum, natural gas, and hard rock ores, leave large ruts, tailings, and toxic poisons at their backsides as they move on. Congressional policies that frequently legislate for low, low rentals of lands managed by the U.S.D.A., all to the favor of stockholders owning shares in large cattle ranches, gas, timber, and mining companies, is an impediment to the legacy the present generation must pass on to their children and grandchildren, if future generations are to enjoy pristine forests and the grandeur of our park system. (Individual, Bellingham, WA - #6900.41720)

There is an overriding emphasis on timber harvest at the expense of recreational uses. I am in support of sustainable timber harvests in the national forests but I am also appalled at the over-harvest mentality that does little to protect the species that rely upon the forest ecosystem. (Individual, Kenyon, MN - #1057.21600)

The economic interests of a small number of loggers and others who seek to exploit the National Forests for personal gain is greatly offset by the...number of people who wish to use the National Forests for recreational pursuits. (Individual, Atlanta, GA - #19476.21600)

As we move into the next millennium we are at a turning point with how we manage our public resources. I believe that the indefinitely sustainable practice of tourism is a much wiser usage of land than the logging or mining of our national forests. (Individual, No Address - #2794.71220)

Public Concern: The Forest Service should prioritize protection of forest ecosystems.

The time is past wherein we have the luxury to view our national forests as a resource to be exploited. To the contrary, we have an obligation to the present and future generations to preserve them for all time. In the broader context of impending global warming, economic and so-called recreational considerations must necessarily bow to the health and sustainability of forest ecosystems at large. (Individual, Chico, CA - #658.22000)

One of the things that we need to do in natural resource management is return to common sense. Let ecological imperatives mandate action, not economic gain. Think about whole ecosystems and the effects of human activities on them. In the Sierra Nevada Ecosystem Project science finding I believe that it was reported that logging was the most disruptive thing that could be done to a forest stand, and the highest indicator of where places will burn out of control. (Individual, Pittsford, NY - #3334.22000)

The majority of Forest Service lands that are not already managed as roadless areas are grossly over-roaded. Forest Service land management should shift away from road-oriented recreation and industry, toward non-motorized recreation and habitat improvements, especially for sensitive and endangered species management. (Individual, Hagerman, ID - #2110.23000)

Please continue with your natural resource agenda! (Individual, Red Lodge, MT - #4919.24000)

Public Concern: The Forest Service should promote sustainable forest management internationally.

Please let me know if you have any ideas on how the Forest Service can play a role in wise use of resources internationally. Can the FS somehow use its international forestry program to help stop the mining of Siberian timber by private companies, timber which eventually ends up in American products? (Individual, La Grande, OR - #13327.41200)

Public Concern: The Forest Service should re-focus forest management on habitat restoration activities and ecosystem health goals.

Forest management actions in roadless areas should be combined with habitat restoration actions. Previously roaded areas that have high potential for timber production and low erosion potential, should be considered for a sustainable wood product industry. Large scale industrial forestry should be confined to areas with low fish and wildlife potential and efficient timber plantations in the Southern U.S. (Individual, Kalispell, MT - #1580.21000)

This proposal is one that speaks to the future instead of the past, and it is completely consistent with the Forest Service's mission which is, in fact, to be a steward of our public lands. The future, which is being led, and I think appropriately enough, by the Helena National Forest, in one arena in particular, to move from the destructive pattern of road building and everything that goes with it to reclamation and restoration of past mistakes is, in fact, the future and not the past. It is the way the Forest Service should be going, and I applaud you all from the very top to the very bottom for taking this initiative. (Individual, Helena, MT - #11168.10100)

As with other uses on our public lands, the Forest Service must ensure that ALL IMPACTS of road building, road maintenance and even road obliteration are addressed. The health of our forests, animals and watersheds must be a priority for the Forest Service. The Forest Service must have a very clear policy, which outlines when any new road construction or road improvements may be made on public lands. In this policy the health of the ecosystem must take priority. Our past history of over-extraction of resources, extinction of plant and animal species and degradation of our watersheds should be our guide to set strong policies in place to ensure that we do not allow this to continue to occur. All current proposed actions must be put on hold until a new policy ensuring the health of the ecosystem is put into place. We need to establish a policy that allows us to fix our past problems instead of just creating new ones. (Environmental/Preservation Organization, Seattle, WA - #958.22000)

I am concerned that we design for human convenience rather than to assure long-term ecological quality. Currently we follow a traditional paradigm that stipulates we will manage the landscape to achieve a broad spectrum of human values/uses. I encourage you to cast a preferred alternative that shifts that paradigm so we are managing human occupancies of the land to encourage landscape recovery and health and preserve pristine American wilderness areas. (Individual, Phoenix, AZ - #1109.22300)

1.2.3 Multiple Use Management

Many respondents support a general policy of multiple use management for the national forests. However, there are widely divergent opinions as to the proper types and balance of uses on national forests in general and roadless areas in particular. Opponents of the rulemaking often express the view that it is a repudiation of multiple use management; comments to this effect are addressed in Section 1.2.3.1. Some writers cite the Forest Service motto, “Land of Many Uses,” and claim that by elevating preservation above other considerations, the proposed rule violates that mission. Many writers use phrase “multiple use” to mean that commodity extraction and motorized use are permitted without restriction. Supporters of this view rarely consider non-commodity values or ecosystem preservation as a part of the multiple use spectrum. Therefore these individuals frequently express the opinion that land management designations that emphasize these values are contrary to multiple use. Many respondents argue that non-use amounts to non-management, leading to declining forest health. They believe that traditional multiple use represents a balanced approach to forest management. Writers point out, further, that national forests belong to the people, not the agency, and should continue to be managed to meet the needs of all users.

In addition to these general remarks regarding the need for multiple use management, writers make a number of more specific points. Some writers claim that the Forest Service has lost its vision, that it is no longer a world leader in resource management. This, they allege, is due to increasingly top-down management and political pressure that has supplanted science-based timber harvest and resource extraction. One individual believes the Forest Service should support the tenets of the Wise Use movement. In a similar vein, another respondent asks the Forest Service to clearly differentiate between “conservation” and “preservation” of roadless areas in the Draft EIS. “The proposal, alternatives, and discussion,” this writer points out, “all lead to the concept of ‘preservation’ and not ‘conservation.’ Conservation is more appropriately defined as the ‘wise use’ of resources, not withdrawing them from use.” The proposed rule, many of these writers feel, would reduce the percentage of land available for multiple use. One writer points out that despite the claim that this won’t affect multiple use management, a ban on new road construction will mean that local forest managers will decline to open areas to commodity extraction for fear of litigation.

Opponents of the proposed rule often argue that active management is actually better for the environment than allowing natural processes to predominate. One writer claims that in multiple use management may actually foster the development of wilderness quality lands, since environmental organizations identify more and more acres each year which qualify for wilderness designation. Many writers point out that the Forest Service should consider the future raw materials needs of the population for forest resources, and fear that the proposed rule would

decrease the agency's ability to meet these demands. Many respondents stress that multiple use management as applied to roadless areas should include commodity extraction. Indeed some of these writers believe forests should be managed like farms with timber being viewed simply as an agricultural product. A few writers suggest that the Forest Service should look to Europe for forest management guidelines, noting specific examples that appear to protect the environment while meeting the needs of users. Finally, many opponents of the proposed rule argue that multiple use management should include motorized recreation.

Proponents of a roadless area conservation rule argue that traditional multiple use management has not sufficiently protected National Forest System lands. These viewpoints are addressed in Section 1.2.3.2. They believe that the Forest Service should not manage roadless areas for traditional multiple use that emphasizes commodity extraction. A large number of proponents point out, moreover, that on many public lands recreational values already outweigh commodity values and that this trend will continue. Therefore, they conclude that the Forest Service would do well to encourage tourism and recreation over traditional resource extraction.

A number of those favoring the proposed rule do not believe that multiple use management should be ended per se, but rather that the concept itself should be restricted or redefined. Many feel that the Forest Service has been too narrowly focused on timber harvest in the past and that the agency must now better balance non-commodity uses and ecosystem benefits as legitimate multiple uses. Writers claim that multiple use management should take into account the overall vitality of the ecosystem; they argue as well that the concept of use should be disconnected from that of consumption or harvest. They argue that multiple use management does indeed include protection of roadless areas, noting that the mix of uses in roadless areas is just different than it is in areas open to other activities. One writer notes that multiple use management does not mean every use should be available on every acre. If all lands were roaded, logged, or mined, another points out, then that would not be multiple use. While many opponents of the proposed rule fear that needed commodities will be locked up, a few writers take the opposing view that natural resources in roadless areas should be set aside now in order for them to be available in the event of future national need or emergency.

Some writers argue that multiple use management of roadless areas should not include commodity extraction activities, because the non-commodity value of these lands for recreation and intact wildlands are most important to today's society. Many others feel that multiple use management of roadless areas should emphasize wildlife and habitat values. As one respondent notes, all too often the interests of wildlife are not valued as much as development activities, yet they're "an important natural resource to our future and to the long-term health of our forested ecosystems." Many proponents of roadless area conservation feel strongly that multiple use management of these areas should not include motorized recreation. Indeed, argue some, a strong national policy is needed which will place ecological values above the interests of motorized recreation in roadless areas.

1.2.3.1 Commodity Values and Multiple Use Management

Public Concern: The Forest Service should manage all National Forest System lands for traditional multiple uses.

Please uphold the United States Forest Service motto, “Land of Many Uses.” (Individual, Breckenridge, CO - #17431.21000)

The proposed rule elevates preservation over all considerations of multiple use, in violation of USFS’ mission. (Individual, Albuquerque, NM - #16182.21000)

We need management to FACILITATE MULTIPLE USES OF OUR PUBLIC LANDS so as to maximize its value to everyone. Public land is just that, “PUBLIC,” it’s your land, it’s my land, and it’s every citizen’s of this nation land. Each one of us should have access to use our land with the least restrictions possible. These public lands do not belong to the Forest Service, B.L.M. or any government entity, they belong to us the public. The land is only managed for us by these government organizations. It should be managed to accommodate all of us not just one or two of the special interest groups. That means we need more roads, trails, and other means of access wherever it’s possible, not less. At the very least the accesses (roads trails etc.) we now have should remain open. (Individual, West Point, UT - #4008.21200)

Public lands should be for multiple use. The lands and the forests should be used for the enjoyment of the public, as well as serve as an economic base for supporting communities close by. (Individual, Klamath Falls, OR - #2909.21300)

As a stock user on the forest lands, I am committed to having these public lands open for recreational use for stock users (horse and mule) for future generations. I do not want to see recreational use eliminated or restricted in these inventoried roadless areas. I support a movement called “The Wise Use Movement.” This movement believes in the use of public lands in a responsible and “leave no trace” manner. Public lands can be used wisely while being protected and managed for future generations. (Individual, Arlington, WA - #10798.92300)

We should all be able to use the forest as it was intended to be used. THE LAND OF MANY USES. It should be just that, because my uses may be different than yours, doesn’t make yours or mine wrong. Plus this is not a good economical decision, instead we should work together. Loggers, miners, sportsmen, and environmentalists. We all have our place in our National Forest. (Individual, No Address - #10367.21000)

Conserving our forests is of utmost importance, but control of mining, lumber cutting, and grazing can be done on a conservation program which still allows citizens to enjoy the beauty and recreation of the national forests, without jeopardizing the industries aforementioned. (Individual, No Address - #43187.21000)

Public Concern: The Forest Service should return to decentralized management with an emphasis on scientifically-based resource extraction.

The USFS used to be a world leader in resource management but now, at best it is middle of the pack, worldwide. This isn’t because of ecosystem management or lack of good USFS people. It is because leadership has lost its vision of what a well-managed forest is and it is because the agency is now driven by large scale, top-down, political corruption that has driven out both good art and science in its practices—and this roadless area DEIS and its underpinnings are a good example of that corruption. (Individual, No Address - #13243.44300)

Since retiring in 1980 I witness in my judgment the deterioration of national forest management based upon sound scientific established principles. Multiple use plans have been supplanted with often emotionally inspired wishes and demands leading us down a path that precludes use and protection of the forests in the long run. This latest non-use proposal to close and/or preclude roads in the national forests is another BIG mistake--not management! (Individual, No Address - #541.21000)

Public Concern: The Forest Service should distinguish between “conservation” and “preservation” of roadless areas in the Draft EIS.

The document repeatedly references the “Conservation” of roadless areas. In reality, the discussions in all chapters refer to protection and preservation of roadless areas. The proposal, alternatives, and discussion all lead to the concept of “preservation” and not “conservation.” Conservation is more appropriately defined as the “wise use” of resources-- not withdrawing them from use. The Summary, Page S-2, defines the importance of roadless areas for watershed and ecosystem health only. The resources in roadless areas must be identified as being important to community health in regard to stability, dependency, jobs, income, payments to states, etc. The proposed action leaves little discretion for management of resources in roadless areas. (County Elected Official, Sheridan, WY - #16187.31300)

Public Concern: The Forest Service should not significantly reduce the percentage of National Forest System lands available for multiple use.

With the Forest Service managing 192 million acres and 42 million, or 22%, of those acres in wilderness designation, the addition of 52 million acres more, or 28%, that are now being considered as roadless...will bring the acreage to 50% that will not be managed as multiple use. (Wise Use or Land Rights Organization, Bend, OR - #6727.21000)

Under this plan, public lands designated as multiple use areas would be reduced significantly. In Alaska for example, multiple use area would be reduced from 62% to 7%. Montana’s reduction would be from 79% to 45%. Many other states’ multiple use area would be affected in similar sweeping fashion. (Individual, Thornton, CO - #11264.21000)

I disagree with the statement that this initiative will provide additional protection for the inventoried areas and other smaller unroaded areas through forest planning. On the contrary, this proposal will remove more acres of Federal land from multiple use management practices. (Individual, Clarendon, PA - #8374.10200)

We have been told it will not affect multiple use. But with no roads being allowed developed or improved upon, new forest plans are going to opt out of opening areas to logging. Any such attempt to open areas would undoubtedly bring lawsuits by groups who oppose any logging on “public” land and one of the reasons you give for pursuing this roadless initiative is to avoid lawsuits. (Individual, Mimbres, NM - #8734.43000)

The legislature...points out that the White Mountain National Forest was established by the Weeks Act almost a century ago to ensure watershed protection, a sustainable and continuous supply of timber and recreational opportunities. In short, an application of the principles of resource protection and multiple uses. This balanced approach is not achieved by permanently removing up to 40,000 acres of productive forest. (Business/Business Association, Glen Falls, NY - #2755.21000)

Public Concern: The Forest Service should consider that active multiple use management including commodity extraction is better for the environment.

I have spent considerable time in the national forests, as well as on land owned by Weyerhaeuser and other forestry companies. Frankly, these companies maintain their forests in such a way that the fire safety, wildlife population, accessibility and general appearance are all substantially superior to the national forests. (Individual, No Address - #510.22000)

The envioliars put out this nonsense that the users (logging and mining especially) have done irreparable harm to our wildlands. Nothing could be further from the truth, modern regulations and practices treat the forests better than doing nothing at all. The forests need professional multiple use management. (Individual, Red Bluff, CA - #2341.21500)

Current management under the multiple use mandate must be working, the wilderness lobby “finds” tens of millions of acres of public land every year that now qualify for designation; multiple use must foster that growth of wilderness quality lands, restriction may jeopardize that success. (Recreational Organization, Los Alamos, NM - #5663.21000)

Public Concern: The Forest Service should abandon the proposed rule to maintain flexibility to meet the future resource needs of society.

Our country needs & will need in the future resources from a well-managed forest system. Roadless area conservation will end with more wilderness & National Parks being a goal. Management options are needed for the public’s best interests. We don’t need lock-outs or set-in-stone rules. We don’t need more wilderness ... we may need resources from our National Forests due to a national emergency in the future (Individual, Sheridan, WY - #7404.21000)

The proposal is a retreat from the basic and sound principles embodied in multiple use and sustained yield management. A basic tenet of multiple use is to manage the forests not according to an unchanging rigid prescription but to serve the changing needs of a changing society, those uses ranging from timber harvest to wilderness preservation. (Individual, Juneau, AK - #8099.21000)

The national forests have been mandated to provide sustained multi-use for the American public. One of the identified multiple uses includes the silvicultural management of the forests’ primary renewable resource, timber. Much of the pulp and paper and forestry industry relies on the sustained management of the national forest resources as a source of wood pulp and products. (Business Association, East Lansing, MI - #1043.21300)

To make this rule a viable one for our area, it must not impinge upon the needs of our local commerce, business, and recreational purposes. Our economy is simply needful of these forests for these many uses. I would urge this rule to be created in such a way that these lands can be “reserved” yet not allow for lands already in use to be converted from their present use. I understand this will be a large undertaking but feel it is imperative for our local economies that as much flexibility as possible be maintained. (Individual, Park Falls, WI - #2757.21300)

Our National Forests belong to all Americans and should be managed to provide for their needs. The Forest Service should be mindful of its motto of “Caring for the land and Serving the People,” not Serving the Environment at the Expense of the People. Meeting the needs of the public, while maintaining forest health and protecting the environment are not mutually exclusive. Proper management can and should achieve both. (Business, Arlington, VA - #43882.10200)

Public Concern: The Forest Service should manage the national forests like farms.

On the farm where I was raised, after seventy-five years of its yielding wood, water, wildlife, and recreation, our forest is as beautiful and productive as ever. It helped support our family as its skid roads, soon to be overgrown, gave access to wildflower gardens, berry patches, ever flowing springs, scenic vistas, special camping sites, and the trees that we harvested to heat our home or for lumber. Never was there a rule that said "no roads allowed." Our farm forest in miniature, is what a national forest should be. (Individual, Juneau, AK - #8099.10200)

When did the US Forest Service change from its function to manage the forest as an agricultural product? As a subdivision of the Department of Agriculture, was it not created to manage the forest as a renewable crop, to be harvested and replanted like all other crops? (Individual, Bigfork, MT - #10834.20000)

Public Concern: The Forest Service should adopt European forest management practices.

During an extended visit to Europe, and principally in Switzerland, we had the opportunity to HIKE some of their MANAGED forests. They very SELECTIVELY cut OLD and/or diseased trees and label and stack them in the forests for subsequent transport to the mills. They also reduced the undergrowth fire hazard. Motor vehicle access was limited by permit and dated decals. The roads served multipurpose including hiking for picnics and other recreational uses, as well as for harvesting and transport of timber. Some permanent cabin living quarters served a watchdog capacity for security much like that observed in Canada's National Parks. We encountered very little traffic during our hikes and NO off road vehicle roughhousing! While I realize Switzerland is quite small compared to your jurisdiction, I believe they furnish us some possible guidelines for managing our forest lands. (Individual, Bozeman, MT - #320.21000)

For examples of excellent forest management for multiple uses, I recommend the Forest Service study the practices which have been utilized for centuries in Europe, especially in Germany and Finland, which could be adapted and applied to the areas now being considered for closure. Abandonment of scientific management of these lands would not only be wasteful of natural and recreational resources, it would be patently foolhardy. (Individual, Escanaba, MI - #18499.23000)

Public Concern: Multiple use management should include motorized recreation.

I am writing to express my support for the principle of multiple use management of our public lands. Allowing responsible motorized and non-motorized recreation on our public lands. (Individual, Bellingham, WA - #352.21400)

There are far too few places to participate in off-road activities now, and this will make matters much worse. There is room for MULTIPLE USE in the Nation's forests, this plan calls for single use, and it stinks. (Individual, Fort Bragg, CA - #19847.21400)

1.2.3.2 Non-Commodity Resources and Multiple Use Management

Public Concern: The Forest Service should not manage roadless areas for traditional multiple use that emphasizes commodity extraction.

Roadless areas are not safe when left open to “multiple use.” (Individual, Olympia, WA - #540.21000)

While I do not prefer total roadless areas I feel that logging, mining, cattle grazing and other destructive types should not be allowed in these areas. There are many persons who are unable to hike into these areas who would like the opportunity to see these beautiful places. Therefore some roads are necessary, but only to view the areas. We have too many tree lots now that are no longer forests. We do not need more. The logging companies can continue to use their tree farms. (Individual, Tucson, AZ - #2068.21000)

Preventing road construction in remaining unroaded areas is wonderful, but this landmark issue is more than just roads. It is about preserving more wild areas from all destructive aspects of the multiple use doctrine. Logging must not be allowed in these remaining wild areas as well. Neither should mining or damming. (Individual, No Address - #1952.21300)

We would now like to turn our attention to the management concept of “multiple use objectives.” Historically, this management practice has decimated Pacific Northwest’s beloved ancient forests, [and] muddied our salmon-bearing streams and rivers. In a recently published study by Dr. Thomas Michael Power of the University of Montana titled “The Economic Impact of Preserving Washington’s Roadless National Forests,” he calls multiple use “a fantasy built around ignorance of unavoidable damage, that road building and commercial extraction causes to other forest values.” WE IN THE SEATTLE AUDUBON FIRMLY BELIEVE THAT THE MANAGEMENT CONCEPT OF “MULTIPLE USE OBJECTIVES” IS DIRECTLY AT ODDS WITH THE INTENT OF THIS ROADLESS INITIATIVE. It is time that the FS should abandon this destructive and unsustainable management philosophy. (Environmental/Preservation Organization, Seattle, WA - #44259.21200)

Public Concern: The Forest Service should shift its management approach of roadless areas to recognize that recreational and ecosystem values outweigh commodity values.

This bank of undeveloped land is more valuable than all of the mineral and timber wealth it contains. Over the years recreational and wildlife uses will be [the] more important commodity due to development pressures in the rest of the country. It is our future. (Individual, No Address - #31.22300)

In the overall planning for management of national forests, it is important to include roadless areas where the values of biodiversity and quiet recreation can be upheld. I am not opposed to best management practice timbering on portions of national forests, but as the population of the U.S. increases, more and more folks look to the forest lands for places of solitude, self-renewal, and quiet recreation. Here too, in roadless tracts, we can protect biodiversity for its value to tourist-based economies, wildlife habitat, and as sources of plant genetic material. (Individual, Eagle River, WI - #1583.22000)

Protection of these roadless areas not only makes ecological sense, it makes economic sense. It is time to put a stop to the wasteful and destructive practices of the past and protect our national heritage. This land belongs to all the people, not just the few who want to exploit it for quick profits with no thought to the costs, both ecological and economic, to the vast majority of citizens and taxpayers. They have had their 90%, save the rest for the people of this great nation. (Individual, Springfield, IL - #7499.41500)

Public Concern: Multiple use management in roadless areas should emphasize non-consumptive uses and values.

I strongly support President Clinton's Roadless Area proposal. The vast majority of America is blanketed by roads. The National Forests have thousands and thousands of miles of roads. What's rare nowadays is an area without a road. Forests are managed for multiple use. Ecosystem protection and non-motorized recreation are key uses. We should stop building roads in the National Forests to advance these uses. (Individual, Hampton, VA - #5236.10100)

Most National Forest land has been dedicated to a single purpose - logging. Please preserve what few roadless areas we have left as it is obvious that these areas will be critical for the wilderness and recreational needs of a growing population. (Individual, Chicago, IL - #1336.90000)

Roadless areas do indeed support multiple use. It is just that the mix of uses is different from the mix found in areas utilized for motorized recreation. Habitat for certain endangered species and primitive recreation in a quiet, natural setting are uses that cannot be accomplished in areas laced with roads. Multiple use does not mean every use on every acre. This is simply not possible. It certainly does not mean motorized vehicles on every acre where it might be feasible to drive them. (Individual, Lakewood, CO - #12965.21000)

I am confused by the concept of "multiple use" which I can only assume allows timber harvest, ATV use, and other destructive, impactful uses. I think the concept of multiple use is only valid if "USE" is disconnected from "CONSUMPTION" or "HARVEST." Those varieties of "use" are destruction, fragmentation; "SENSELESS USE" in a nutshell. (Individual, Minneapolis, MN - #1887.21300)

If all lands end up roaded, logged & mined etc., then our forests will not truly be MULTIPLE USE. (Individual, Standard, CA - #9721.2100)

Some of the worst clearcut areas are not on private land, but public land that we as taxpayers and citizens own and expect protected. One area that comes to mind is the southern approach to Olympic National Park. How could you allow such desecration? We trust that multiple use will come to mean more than use and destruction by mining and lumber interests. We need to preserve what little you have left us. (Individual, No Address - #2945.21300)

EMPHASIZE WILDLIFE AND HABITAT VALUES

Wildlife and habitat for wildlife is one of the multiple use objectives of the Forest Service. Too often, habitat for wildlife does not seem as valued as much as development activities are valued. Yet, wildlife are an important natural resource to our future and to the long-term health of our forested ecosystems. (Individual, No Address - #5197.22000)

As a Forester and a believer in multiple use of forests, we still need wilderness areas for the protection of wildlife and native plant life. Wildlife requires some tranquility and they can't get this in small areas. (Anonymous - #9825.21500)

CONSIDER THE OVERALL VITALITY OF THE ECOSYSTEM

The concept of "Multiple Use" needs to be adjusted enough to insure continued vitality of what remains--enough to perpetuate for continuing use and for acting as seed-bank for organisms of a balanced ecosystem. (Individual, Medford, OR - #16968.10100)

The highest and best use of our public lands in the coming century will be to maintain the processes and functions required for ecological integrity, the protection of our priceless watersheds, and the preservation of our wildlife heritage. The protection of large roadless areas across the broadest possible range of landscapes will be essential to this effort. (Individual, Cody, WY - #9386.22000)

Public Concern: The Forest Service should adopt the proposed rule to preserve commodity resources for the needs of future generations.

If a national emergency occurs in which we need the resources provided in these wild lands, they will still be there, available for our national needs. They won't have been ripped out and sent overseas to the highest bidders. Nor will they have been taken for granted and wasted on nonessential expansion. Just as we need our petroleum reserves, we need these "reserves" of wilderness. (Individual, Idaho Falls, ID - #6876.63000)

Public Concern: Multiple use management of roadless areas should not include motorized recreation.

I feel multiple use should not be a free-for-all, nor use by the loudest or most intimidating pressure group. There should be opportunity for quiet hiking or observation without the distraction and worse of motor powered devices of any sort. Other areas should allow motorized recreation, but be regulated so as to limit injury to plants and animals. (Individual, Springfield, VT - #2234.21400)

I understand the Forest Service's mandate under the Federal Land Policy Management Act (FLPMA) to manage for multiple uses, including off-road vehicles. However, on the national forests in central Utah alone there are already over 1,700 miles of ATV trails. Ample acreage must also be set aside for non-motorized recreation including backpacking, hiking, and bird watching. These too should be considered as important multiple uses, for which we desperately need permanent protection of roadless areas. (Individual, Las Cruces, NM - #19477.21400)

We urge the Forest Service to take the strongest possible action to protect all roadless areas under 1000 acres within its jurisdiction. This must include barring access by any off road vehicles or machines, whether for recreation, fire control or any perceived need temporary or otherwise. Allowing just a chosen few, including Forest Service personnel, to violate roadless areas negates the whole purpose of protection. (Individual, Loomis, WA - #9203.10110)

DEVELOP A NATIONAL RULE TO PROHIBIT OFF-ROAD VEHICLE USE

We are concerned about off-road vehicle (ORV) use in existing roadless areas and believe such use should be curtailed and in a great many cases eliminated because these machines are incompatible with the fragile ecosystems found there. Roadless areas should not be subjected to uses that degrade their wild character. The draft policy (Roadless DEIS) fails to provide a national rule on off-road vehicle use in roadless areas, instead leaving it to be decided locally, by Supervisors of each National Forest. To preserve the integrity and wild character of roadless areas, we believe it is necessary to greatly restrict off-road vehicles in roadless areas, subject to only very limited local variance. While some discretion might be allowed the Supervisors, particularly in cases of life-threatening emergencies and in areas where limited subsistence use might be provided for isolated communities, we believe that strong direction should be given in the national policy that places the ecological values above the destructive and frequently annoying use of motorized recreation. (Environmental/Preservation Organization, Seattle, WA - #10788.91612)

I am disappointed that the Forest Service has apparently determined that regulation of Off Highway Vehicle (OHV) use is an inherently local issue. I disagree and feel that the agency should establish national guidelines to assist local Forest Service officials make sound management decisions regarding when and where use of OHVs should be permitted. I do not feel that unroaded portions of inventoried roadless areas are an appropriate location for such an activity, particularly given the roadless area characteristics that the proposed rule is designed to protect. The Forest Service should either incorporate nationwide restrictions on OHV use within the proposed roadless area conservation rule, or expeditiously initiate a separate rulemaking proceeding to regulate the use of OHVs. (Individual, Brighton, IL - #50615.21400)