

Chapter 2 Consultation, Coordination, and Public Involvement

This chapter covers public concerns about the processes used by the Forest Service to obtain and consider the informed input of interested individuals, groups, tribes, and government entities. While some respondents praise the Forest Service for its efforts, many complain that, in the case of the proposed rule, the process is biased, opaque, rushed, and politically motivated. The result of these perceptions, evident in many responses, is a substantial lack of public trust in Forest Service decision-making processes at both the national and forest level.

Issues of Coordination and Cooperation are treated in Section 2.1, Rulemaking Processes in Section 2.2, Issues of Trust and Integrity in Section 2.3, and Public Involvement Processes in Section 2.4.

2.1 Coordination and Cooperation

Many respondents believe there is a general lack of coordination and cooperation by the Forest Service, both internally and with entities outside the agency. Comments regarding these issues come from other government agencies, especially states and counties, special interest groups, and individuals. On the whole respondents urge the Forest Service to create a compatible, open environment that promotes shared solutions within land management decisions. Comments specifically addressing Coordination with Government Entities are covered in Subsection 2.1.1, and comments addressing Tribal Consultations are reported in Subsection 2.1.2.

Public Concern: The proposed rule should call for continued efforts in creating compatible working arrangements among the Forest Service, special interests, and the general public.

Locking up our forests is not caring for them. It is not responsible forest management. We were getting so close to “getting it right” in the management of Forests and Wildlife; and in a compatible working arrangement between the Forest Service, the public, sportsmen and industry. (Individual, No Address - #6375.41000)

Somehow raise the discussion out of the “we-them” that loggers seem to sense—need the wisdom and experience of conscientious and responsible timber folks, no doubt loggers for the most part have deep respect and love of the forest-somehow the cause is poorly communicated. (Individual, Ferron, VA - #9610.41720)

More national direction is needed to help define roadless areas and how to protect them. (Individual, Ashland, NH - #43178.41000)

There is room for all users out there. My son and I would like to recreate responsibly on the PEOPLES’ land. Why won’t the “enviros” WORK WITH US not against us? (Individual, Hampton, NH - #7672.41700)

We also urge the agency to use advisors from all user groups in future rulemaking. (Individual, Klamath Falls, OR - #13671.41700)

2.1.1 Coordination with Government Entities

A number of respondents share concerns over the Forest Service's coordination efforts with local conservation districts, counties, states, tribes, and elected officials. Many note the need for increased local involvement in the decision-making process for the final rule. Others urge the Forest Service to address the impacts of the proposed rule on other agencies' coordination efforts, with specific reference to the Unfunded Mandates Executive Order of 1995 (see Chapter 3 for legal concerns relative to this order). A number of respondents believe the Forest Service should collaborate with individual state and county governments regarding local jurisdictions. One county specifically notes that the Forest Service "did not take into account the ecological and resource use factors that other agencies contribute through their management for biodiversity, eco-regions, etc." According to this county, "If the Forest Service does not want this analysis on a national scale the agencies to collaborate with are the individual county governments concerning each individual case."

A number of government entities express a need for more information on how the proposed rule would affect management access for state and local agencies to carry out their responsibilities for e.g. the abatement of noxious weeds, wildland fire suppression, and developed water infrastructure and wildlife management. One individual suggests a Memorandum of Understanding (MOU) between the Forest Service and county commissioners outlining road management strategies for roads within county jurisdictions. Another individual suggests, in addition, that more cooperative planning is needed between the Forest Service and state and local agencies to address community concerns.

In addition to concerns over coordination with respect to management, respondents also voice concerns over coordination with respect to analysis. One county, for example, asks why the Forest Service did not include local conservation districts in its analysis for this proposal, nor even include them in its distribution list for the Draft EIS. Others cite the need for the Forest Service to do a better job of involving all federal land management agencies in its analysis, as "natural resources...do not recognize administrative boundaries." Finally, a number of individuals believe the federal government should coordinate the expansion of roadless areas onto non-National Forest System lands.

Public Concern: The Forest Service should increase local involvement in decision-making process for the final rule.

The 2nd round of decisions on further roadless areas for consideration this fall/summer needs multi agency collaboration on local levels to establish criteria for those decisions. (Individual, Grand Rapids, MN - #671.40000)

The Proposed Rule Is Contrary to Law Because It Evades Statutory Requirements of Public Participation In the Planning and Management Process (including administrative remedies) and Requirements of Coordination with Local Government. Stewards of the Range members have reviewed the comment submitted by the Modoc County (California) Board of Supervisors, agree with the content of that comment and urge compliance with the recommendations of that comment. Stewards incorporate herein by reference all contents of that comment, and particularly emphasize herein the comments related to dilution of public and local government involvement. The Modoc County comment states: "The new Rule eliminates the mandatory requirement of Service [Forest Service] to

coordinate planning with state and local governments are notified considered and may participate in Service planning. While on the one hand the Service says one of the goals of this new rule is to increase collaboration with the public it replaces mandatory involvement with discretionary input, left solely to the whim of the decision offer to 'provide opportunities for involvement.' This is unacceptable. It ignores the record of success that has always followed full cooperation and coordination between the Service and local government. It also sharply reduces the public opportunity to be involved through the NEPA process. [The public's] NEPA rights will be reduced to the project level where the management sideboards will have already been decided (without their full input) at the broad assessment level." Members of Stewards of the Range have witnessed the success of county government involvement in land use planning through the coordination mandated by Congress in various statutes. Current Forest Service regulations require such coordination, as do BLM regulations. The proposed rule departs from this course set by the Congress. (Individual, Las Vegas, NV - #15882.54100)

Public Concern: The Forest Service should address the impacts of the proposed rule on other agencies' coordination efforts.

This DEIS and the associated proposed rule amendment violate the Forest Service Agency Directive that resulted from President Clinton's Unfunded Mandates Executive Order of 1995. All language in the DEIS that does not adequately address the availability of funds, and all changes in the Forest Plans that are to be revised and/or amended through the Decision resulting from the final EIS requiring additional funds, must be funded for implementation through appropriated funds. Otherwise, all such unfunded mandates must be removed from the documents in deference to this Order and subsequent Agency Directive. (Business Association, Beaverton, OR - #52230.55500)

The manner in which the Roadless Area Initiative is being implemented violates the National Forest Management Act and the Wilderness Act. The Roadless Area Initiative itself violates the Multiple Use Act, and is another unfunded mandate, which Washington D.C. bureaucrats are attempting to force on rural citizens who live in, use, and depend on the forest. (Individual, Mercer Island, WA - #10319.53000)

Public Concern: The Forest Service should collaborate with individual state and county governments regarding local jurisdictions.

The Forest Service did not take into account the ecological and resource use factors that other agencies contribute through their management for biodiversity, eco-regions, fragmentation, size, open space, roadless recreation, etc. The Bureau of Land Management, National Park Service, Fish and Wildlife Service, all should be considered. Since this analysis is on a national scale all agencies need to be considered for their contribution to the numerous ecological and resource use factors. If the Forest Service does not want this analysis on a national scale the agencies to collaborate with are the individual county governments concerning each individual case. (County Elected Official, Goldfield, NV - #16085.82000)

If there is to be local control, which on the surface seems to be the best way to go, I would like to see a memorandum of understanding [MOU] between the Forest Service and the county commissioners, who ultimately are in control of the roads within their counties. The MOU should outline which roads can be counted on to remain open, which ones would likely be seasonally closed, the date they can be expected to be reopened and which roads would be permanently closed. There should be a moratorium on road closures in the Big Horn Mountains until such time as all roads previously closed without public comment are either reopened or remain closed with the blessings of the county commissioners. Without the involvement of the county commissioners, I am not clear as to the legality of the roadless area moratorium. (Individual, No Address - #22023.40200)

Terrestrial and Aquatic Plant Species Comment: Entire Section--States and local governments have concurrent jurisdiction over many issues, and primary over many others, that are interwoven and incapable of separation from any realistic examination and disclosure of effects. In this case, states and county weed boards have jurisdictional responsibilities for the containment and control of invasive non-native plants, e.g., noxious weeds. This includes

land administered by the Forest Service. Again, no consideration or discussion is given of how this proposal could affect local control of noxious weeds in these roadless areas. Will there be increased costs associated with noxious weed management incurred because of the proposed restrictions on roads in current roadless areas? These issues need to be discussed and disclosed. (County Elected Officials, Worland, WY - #16185.71100)

The Forest Service must consult with local communities to adequately evaluate and disclose the effects of catastrophic wildfire on public safety, health, and impacts. (County Elected Officials, Worland, WY - #16185.41600)

While USFS is a federal institution more cooperative planning is needed with state and local agencies to handle other employment revenue matters which are in discussion here such as: other transportation alternatives, and developments, tax codes, wage initiatives, etc. (Individual, Corvallis, MT - #9400.40200)

The Forest Service should explain why the local conservation districts were not included in the analysis, nor included in the distribution list, as mandated by the 1996 Farm Bill.

Comment: General--The 1996 Farm Bill signed by President Clinton expanded the role of local county conservation districts in resource management, including lands administered by the federal government. The local conservation districts need to be included in decisions affecting soil, water, noxious weeds, etc. Nowhere in the document have their roles and responsibilities been acknowledge or defined.

Relief: The Forest Service must explain why Conservation Districts have not been included in this analysis. In addition, Conservation Districts were not included in the distribution list (Page 4-9 through 4-11) and never mentioned in the entire document. (County Elected Officials, Worland, WY - #16185.40200)

Public Concern: The Forest Service should do a better job of including and involving all federal land management agencies in its analysis.

There needs to be more information in the Final EIS on other roadless areas of other federal agencies which may be relevant in assessing the management of inventoried roadless areas and unroaded areas on the National Forests. Natural resources, of course, do not recognize administrative boundaries. For a true understanding of the significance of any roadless area on the National Forests, it is necessary to not only examine their context with regard to other lands on the National Forests, but also to adjoining lands of other federal agencies. At the very least, the Final EIS should include a map of Wilderness Study Areas of the BLM.

Such an analysis of adjoining roadless areas on other federal lands is also consistent with a current management trend of coordination between the BLM and the US Forest Service. Examples include the shared administrative facilities between the BLM and the Fremont National Forest in Lakeview. Additionally, it was recently announced that there would be a consolidation of management among the Ochoco and Deschutes National Forest and the Prineville BLM. Such coordination among the agencies is long overdue. This Proposed Rule and EIS would go a long way in advancing this kind of coordination by providing information in the Final EIS of the location of the BLM WSAs. (State Elected Official, Salem, OR - #18661.40110)

Public Concern: The federal government should coordinate the expansion of roadless areas onto non-National Forest System lands.

I am in support of adding more roadless areas to the National Parks and other Federal lands.

There are too many people using these areas now and we don't need more ATV's, Bikes, etc. on them. (Individual, Thermopolis, WY - #8616.91600)

I think the Federal Government should work with states like Maine, New Hampshire, Vermont and others to preserve roadless areas on the State and private lands. (Individual, Burlington, VT - #421.40200)

Does the rule only apply to the Forest Service and not to other agencies? (Individual, Pocatello, ID - #2959.63000)

2.1.2. Tribal Consultations

Several respondents emphasize the need for tribal consultations. One tribal representative maintains that the Forest Service should continue to consult with tribes if the decision falls outside the proposed action or preferred alternative. Another individual points out that the Forest Service “needs to come to Standing Rock Reservation to consult with [the] Tribal Government on [the Draft] EIS. There are roadless areas within the boundaries of the Standing Rock Reservation, therefore consultation will be needed.” Finally, an environmental group points out that “the Black Hills is holy sacred land to the Lakota. The Forest Service should ‘bend over backwards’ to fully include Lakotas in any discussions about the future of this sacred landscape.” (See Chapter 3 for additional tribal concerns.)

Public Concern: The Forest Service must consult with each effected nation if the final rule and record of decision goes beyond the proposed action.

The Tribal Committees are requesting that the following items be considered when adopting the Rule: Continue to consult with The Native American Tribes regarding any future proposals or decisions other than what has been proposed as the preferred alternative for the “Roadless Area Conservation Proposed Rule.” (Tribal, Grand Ronde, OR - #29958.73100)

USFS needs to come to Standing Rock Reservation to consult with Tribal Government on EIS. There are roadless areas within the boundaries of the Standing Rock Reservation, therefore consultation will be needed. (Individual, Ft. Yates, ND - #3407.40300)

The Lakota maintain they have legal claims to most of western SD, which was once part of the Great Sioux Reservation. In 1980 the United [States] Supreme Court acknowledged that the Black Hills had been illegally taken from the Sioux people and that they have a standing unsettled legal claim to the Black Hills. However the Supreme Court ruled differently on the taking of the rest of western SD. The Black Hills is holy sacred land to the Lakota. The Forest Service should “bend over backwards” to fully include Lakotas in any discussions about the future of this sacred landscape. (Environmental/Preservation Organization, Rapid City, SD - #52237.56000)

2.2 Rulemaking Process

In a very general sense (which is expanded upon in Chapter 3) there is a perception among many respondents that the Forest Service is using the rulemaking process as a means to circumvent the local planning process, existing laws, and the will of Congress. According to one respondent, the rulemaking process “will undermine the cooperative dialogue that occurs during forest plan revisions and will cancel years of research, and scientific analysis, collaboration and compromise.” Another respondent charges that “this rulemaking process is politically driven, and is not science-based. It blatantly circumvents both the forest planning process and the Wilderness Act.” Many advise, therefore, that the process should ensure fairness by using an open decision-making process. Some respondents believe such a process could be achieved by using advocacy groups who are immune to political pressure. Others suggest that what is really

needed is for “interested parties across the country to put aside their differences and submit proposals for protecting roadless lands based on a cross section of interests and a balance of viewpoints.”

Another concern is the speed at which this proposal is moving forward. Many respondents express suspicion over the motives behind “rushing [this process] through,” noting that much smaller projects can take two to three times as long to plan and implement. As one respondent states, “How can this happen so fast when USFS cannot put up a salvage timber sale in less than 3 years?” Others say this proposed rule should be delayed until the other rules pending are finalized.

Finally, some respondents believe the Forest Service should have better defenses against groups that try to hold up decisions and management activities by filing local appeals and litigation. As one individual puts it, “The Forest Service should be able to do [its] work without interference from outside political and environmental groups who care nothing about the people who are affected at the local level.”

In addition to the above concerns, respondents raise a number of concerns over the rulemaking process with respect to the authority for carrying it out and the parties who are or should be involved in doing so. Concerns are further divided into the following subsections: Subsection 2.2.1 Authority; Subsection 2.2.2 Role of the Forest Service; Subsection 2.2.3 Role of States and Counties; Subsection 2.2.4 Role of Citizens; Subsection 2.2.5 Role of Special Interest Groups; and Subsection 2.2.6 Local versus National Decision-making.

Public Concern: The Forest Service should use the land management planning process, instead of rulemaking, to make forest level land use decisions.

In commenting on the Roadless Area Conservation rule, PVOA had to weigh the benefits of the fisheries habitat protection that would be derived from a road prohibition versus the principle of invoking a new national mandate that would override a long term existing planning process, i.e., the Forest Plan process. The existing forest plan process (such as TLMP) is a process in which many parties have participated with considerable time and energy in good faith. As tedious and time-consuming as the Forest Plan process might be, PVOA supports that process over a one-size-fits-all proposed rule such as the roadless initiative. The present Forest Plan process seems to provide more opportunity to use science and specific local knowledge in land management designations and decisions as opposed to a broad national policy that is based on general philosophy. (Business/Business Association, Petersburg, AK - #7542.72230)

One of my greatest fears is by some stroke of a pen in Washington, D.C. my future use of our public lands will be greatly and adversely impacted. (Individual, Sun Valley, NV - #8192.41100)

The Forest Service's rushed scoping also violated NFMA regulations. The final rules would constitute DE FACTO amendments to the forest plans, since they alter the multiple use allocation of currently roadless areas made in forest plans. There are powerful legal arguments that the NFMA and implementing regulations only allow multiple use decisions to be made through a public forest planning process at the individual national forest level, and do not allow the publicly-prepared forest plans to be cast aside through national rulemaking. See 16 U.S.C. 1604(d)-(k); 36 C.F.R. 219.4. The only national-level planning that Congress has authorized is the RPA Program that only applies at the forest level to the extent specifically incorporated into an individual forest plan. See 16 U.S.C. 1602, 1606, 36 C.F.R. 219.4. (Mining Organization, Reno, NV - #15907.44410)

There is no need for this roadless area initiative. It is a top-down, one-size-fits-all administrative fiat that negates the existing local-level forest planning process. It undermines the cooperative dialogue that occurs during each forest's plan revision and will cancel years of research, scientific analyses, collaboration, and compromise. It will veto the decisions on roadless area management that were developed for every inventoried roadless area in existing forest plans by agency personnel, industry representatives, environmentalists, elected officials, and community activists through an open public process--decisions made by the people most knowledgeable about the national forest lands. (Timber Association, Washington, D.C. - #29962.41240)

Public Concern: The Forest Service should not use the rulemaking process as a means to circumvent existing laws.

This roadless proposal is a back door attempt to circumvent existing laws and the will of Congress to create more wilderness areas. This is not in the best interests of the people, the forest or the environment. This proposal is clearly based on the political agenda of the lame duck president catering to a few well-financed radicals who claim to be environmentalists. (Individual, Youngsville, PA - #8285.41000)

I believe that the proposed roadless areas are the administration's way of circumventing the law to put more land off limits to resource management. VP Gore has already said that there will be no timber harvesting in these areas before the people have spoken. (Individual, Susanville, CA - #3585.41100)

The only appropriate venue for considering land allocations on any national forest is through the NFMA-mandated individual forest plans in which all multiple use considerations and social and economic impacts must be considered. The basic premise of a nationwide roads prohibition is counter to the existing Forest Service planning process and its current set of proposed planning regulations. Both the current forest planning process and the proposed planning regulations emphasize local decision making. The preferred alternative is a top-down management decision that forces managers to make decisions based on a national policy that does not reflect local conditions. One need look no further than the Forest Service's proposed planning regulations to see how important the Agency finds public involvement and collaborative decision-making at the local level, yet this proposal denigrates local involvement and seems in no way consistent with the proposed planning regulations, current Forest Service policy, or common sense. (Individual, Anchorage, AK - #52495.41240)

I do not believe that this attempt to circumvent Congress is legal and I strongly oppose this attempt to change the regulations without going through the legislative process. I ask that you uphold our Constitution and put it before Congress. (Individual, Canon City, CO - #1104.52000)

This rulemaking process is politically driven, and is not science-based. It blatantly circumvents both the forest planning process and the Wilderness Act. This Administration has repeatedly called for more local, collaborative decision-making, yet this process did not involve local citizens, or even USFS employees at the ranger district level. (Individual, Missoula, MT - #10621.42000)

Our democratic government was not structured so that a federal agency could bypass Congress and change laws through rulemaking without due process, namely without the ability to appeal. (Individual, Challis, ID - #8034.41000)

Public Concern: The Forest Service should ensure fairness by using an open decision-making process.

The USDA needs an advocacy panel or group to ensure fairness in this process. "The fox is guarding the chicken coop." (Individual, Redding, CA - #13870.42000)

There is need for a watchdog advocacy group that won't have to worry about pressure from politicians.... (Individual, Redding, CA - #13870.41000)

By assessing project by project and not all roadless areas at once it makes it increasingly difficult to have the public input. (Individual, Olympia, WA - #540.44000)

The Forest service should suspend the decision process long enough for interested parties across the country to put aside their differences and submit proposals for protecting roadless lands based on a cross section of interests and a balance of viewpoints. (Individual, Coeur d'Alene, ID - #10962.44400)

My strong choice is to cancel the current scheduled public meetings, junk the current initiative, and create a group to objectively develop a new initiative that is consistent with the Clinton guidelines. (Individual, Spokane, WA - #4546.64150)

I recommend choosing the No Action alternative (Alternative #1) with the following constraints:

Accelerate the completion of planning under RARE II for all the Roadless Area Acres.

Balance planning teams so that resource based planners at least equal the numbers of environmentally inclined planners. Include representation from the following groups as advisors and participants in the planning process. 1. Industry representatives from resource user groups. 2. County Commissioners. 3. State Resource management agencies. 4. Others as appropriate. Revise the appeals process to quickly dispose of frivolous appeals and lawsuits designed to delay planning decisions of designated roadless areas. (Individual, Kooskia, ID - #6765.71230)

Public Concern: The Forest Service should consider the timeframe being taken for this rulemaking process and implementation.

How can this happen so fast when USFS cannot put up a salvage timber sale in less than 3 years? (Individual, Missoula, MT - #11526.41000)

At issue is the timing as well as the process for developing the DEIS. (Individual, Elko, NV - #8412.41000)

It is my opinion that this plan is being rushed through without proper planning. It bears all the marks of special interest groups trying to ramrod their wishes past an uninformed public. The DEIS lacks thorough insight into all of the ramifications of this sort of move. It was done in haste and is not in the best interests of the forest or the taxpayer. (Individual, La Grande, OR - #7671.42000)

I take strong exception to the unprecedented actions of the agency in secretly soliciting and relying on the advice of a narrow spectrum of special interest groups in the development of road rules and policies to be submitted for public comment. (Individual, Klamath Fall, OR - #13671.41700)

The planning has been hurried along with little or no consideration for the good of the forest as a multi-use area as the basic plan of the Forest Service has been for lo these many years. This planning is being rushed into the system to keep a larger percentage of the public out of the woods for any and all recreation activities. The plan is to reserve the forest for only a few selected people to enjoy. (Individual, Klamath Falls, OR - #11357.43000)

The timing of the rule, making it known to the public appears motivated by political schedules, the presidential election, not by the demands of due process. (Individual, Union, OR - #14344.43000)

I also strongly disagree with the rash and headlong speed this proposed rule is moving through the Environmental Impact Statement processes. It normally takes years of research and scientific study to fully address all concerns, effects, and options of a proposed action. I cannot understand how a complicated issue such as the Roadless Area Conservation Rule can progress through both draft and final EIS processes and be put into effect in less than a year. (Individual, Eagle Creek, OR - #8302.44420)

The time period for an E.I.S. to be completed on two thousand acres for the average timber sale is two to two and one-half years. How can the U.S.F.S. expect us to believe that the E.I.S for over sixty million acres can be completed in less than one year? (Individual, Eagle, ID - #8450.44420)

The fast track that the current EIS is on is ludicrous and appears to have been front-loaded from the beginning (judging from the public meetings I have attended). Even FS employees are bereft to explain the resulting consequences from the proposed action. (Individual, Kneeland, CA - #7085.44430)

In addition, we believe this “fast track” plan is designed to be implemented before the November elections and we're appalled that the future of our wild lands is being used as a political pawn. (Recreational organization, Redding, CA - #7388.44420)

I strongly disagree with the rash and headlong speed this proposed rule is moving through the NEPA process. I find it difficult to understand how you can justify spending only two months on a DEIS encompassing such a broad and diverse mass of public domain when you would require a minimum of a year for the same process for development plans on a much smaller parcel of land. (Business, Diamond Lake, OR - #8499.44420)

You had about six months to evaluate an initiative impacting some 40 to 60 million acres on 140 national forests in 37 states. It simply couldn't be done. You folks have struggled to produce IN A YEARS TIME DEIS's on the smallest of federal management proposals. (Individual, Kalispell, MT - #9470.44420)

The quality of the DEIS reflects the rush in which it was produced. It lacks specific studies designed to provide useful information to support it. It misuses, misunderstands, and misuses other information, resulting in the inaccurate and insulting references to woods workers and logging communities found in Chapter 3. This is not the kind of work we expect from the Forest Service. There is no hurry to get this thing done! If you insist on doing it, do it right. (Individual, Salt Lake City, UT - #13258.44420)

Public Concern: The Forest Service should invoke procedural rules on groups that file local appeals and litigation.

The Forest Service should have more of a defense against certain environmental groups and other radical professionals that can file local appeals and litigation about management activities. They can stop timber sales; they can cause sedimentation in streams; they can create a potential fire hazard; they can ban or restrict recreational use; all within our national forests, and they simply are not held responsible or accountable to anyone. The Forest Service should invoke rules of procedure upon these groups or individuals that would ensure accountability in case of fire loss or damages. They should be required to post bond or supply proof of insurance before filing appeals and litigation. The local people and landowners would then have some protection against their fabrications and unreasonable conclusions.

The Forest Service should be able to do their work without interference from outside political and environmental groups who care nothing about the people who are affected at the local level. (Individual, Deer Lodge, MT - #705.41710)

2.2.1 Authority

Many respondents applaud the President's decision to direct the Forest Service to institute the proposed rule. However, nearly all of those favoring protection of roadless areas believe the preferred alternative does not go far enough in meeting the President's mandate. The indication from hundreds of thousands of form letters is that this rulemaking process is appropriate for protection of roadless areas. People appear to approve of the decision-making process being followed. Many individual letters, however, challenge the carte blanche authority of the administration, some of which express extreme opposition and allege that both the President and the Forest Service are violating laws.

According to many respondents, the Forest Service should rely on current legal tools provided through law and constitutional amendments in its decision-making. The most common comment in this regard is that congressional review is required for a management decision such as this. One individual, for example, expresses opposition over the fact that “this study was not authorized by the U.S. Congress, which is required by law.” Many respondents maintain that the President does not have the authority to effect changes in public land management such as this entails. Remarks one individual, “Roadless issues are NOT the responsibility of the American president We have elected representatives for that.” Charges another, “To say that I am upset with these proposals would be putting it mildly. President Clinton’s use of the executive order for purposes such as this is a GROSS ABUSE of the power of his office. It circumvents congressional approval (where the people can really have a say) on issues affecting ALL Americans for the selfish benefit of vocal special interest MINORITIES.”

Respondents also assert that the authority for implementing this proposal cannot derive from a series of regulations, as a number of writers believe this has. On the other hand, some believe the final rule should reflect the wishes of both the public and the President. More common however, is the concern that the final rule should reflect good management rather than current politics. In this regard, some maintain that the chief of the Forest Service “should be considered a primary expert . . . on national resource management” and so “should be consulted on any policy or activity that he or she is expected to execute.” Others make a point of saying that Alaska’s political delegation should not be allowed to dictate public land management. And finally, some respondents express the hope that “the good that may come from this process will not be undone by the next (or future) Presidential administration.”

Public Concern: The Forest Service should rely on current legal tools provided through law and constitutional amendments in its decision-making.

So in promoting this forest Service Roadless Area Conservation Proposed Rule, I am understanding the Proposed Rule is to expand the Wilderness Areas and designate more wilderness areas without the Forest Service using the proper channels by going through congress first. (Individual, Yellow Jacket, CO - #3295.41000)

Any attempt by the Forest Service to change its mandate without congressional approval is illegal, and should not be considered part of the proposed rule. If the Forest Service insists upon changing its mandate from multiple-use to ecological sustainability, then it is incumbent upon the agency to seek a Congressionally approved remedy. (Individual, Canon City, CO - #1103.41300)

Proposed 294.13 c & d enables added protections in addition to no roads, opening Pandora’s box for additional regulations, without review by the public or Congress. (Individual Elko, NV - #8087.33510)

I believe this whole issue should be done in accordance [with] Democratic law and principles—by both houses of congress and the president, not by someone who strives to be king or worse. (Individual, Eveleth, MN - #7953.41100)

I am opposed to this Roadless Area Protection as this study was not authorized by the U.S. Congress which is required by law. The use of mandates and over-use of executive orders has far exceeded its original acceptance. (Individual, Nevada City, CA - #921.41100)

I must express my dismay that the USFS did not think enough of the American public to allow the representatives we voted for to pass judgment on your proposal. To me, this says that the USFS simply does not have the confidence that the proposal would survive the scrutiny of congress and the People. While offers for public comment forums and solicitations for written feedback are a nice gesture on your part, the USFS circumvented the system which was devised to ENSURE that the public's collective voice is heard. (Individual, Ferndale, MI - #10897.41300)

AUTHORITY DOES NOT DERIVE FROM THE PRESIDENT

Roadless issues are NOT the responsibility of the American President....We have elected representatives for that...and it is my understanding that the Forest Service is to take their directives from Congressional approval...not a directive from the President. Please do NOTHING until and unless approved by Congress. (Individual, Kalispell, MT - #2276.41000)

Finch, Pruyn & Co. Inc., respectfully submits that it is beyond the constitutional authority of the Executive branch to unilaterally alter the intent of Congress. We urge the Forest Service to reconsider this proposal and leave forest planning to the industry representative, environmentalists, elected officials, community activists and federal and state agencies in an open, public process at the local level. (Business/Business Association, Glen Falls, NY - #2755.41000)

Our national forests are our property to be shared by all our people and visitors--not just for this present administration in Washington to dictate by executive order the wishes of a select few. (Individual, Buena Vista, CO - #3299.41000)

To say that I am upset with these proposals would be putting it mildly. President Clinton's use of the executive order for purposes such as this is a GROSS ABUSE of the power of his office. It circumvents congressional approval (where the people can really have a say) on issues affecting ALL Americans for the selfish benefit of vocal special interest MINORITIES. I can only hope that more of us in the silent majority flood Washington with our wrath as we see our liberties perverted and/or taken away! (Individual, No Address - #2232.41000)

I am against the Roadless Proposal for the following reasons: It places too much power in the Executive branch of government. (Individual, Vancouver, WA - #2291.41100)

AUTHORITY DOES NOT DERIVE FROM A SERIES OF REGULATIONS

"The overriding attention to biodiversity does not bother me so much as an appropriate policy or a mission. In fact, as a biologist, I support that as a mission--but with considerable reservation as to how management direction has evolved from regulatory agencies. It troubles me that this is a "mission" that has simply evolved out of a series of laws and pursuant regulations, court cases, and policy direction.

This evolved mission should be ratified or rejected--by Congress and the Administration. If such is determined to be the FS's overriding mission, so be it. If Congress disagrees, it has the duty to clarify the situation. At least the committees in Congress should acknowledge the situation." (Timber Association, Medford, OR - #13658.20000)

Public Concern: The final rule should reflect the wishes of the public and the President.

I am a frequent visitor of the Ocala National Forest and it saddens me to see so many roads in a "protected" forest. The Forest Service, as a government agency, needs to make decisions that reflect the wishes of the public and president. (Individual, Lake Mary, FL - #3695.41200)

Public Concern: The final rule should reflect good management rather than current politics.

I have dealt with the Forest Service on and off for 23 years and found that their policies do not reflect good sense but just the idiosyncrasies of the current administrator and Washington Bureaucrats. (Individual, Clinton, MT - #12264.41000)

I believe we should let Foresters manage the Forests & leave the politicians out of it. (Individual, Crandon, WI - #8317.41240)

THE CHIEF OF THE FOREST SERVICE IS THE EXPERT AND SHOULD BE CONSULTED

...the Chief should be considered a primary expert (often through staff) on national resource management policy within the Administration. As such, the Chief (and appropriate staff) should be consulted by higher levels of government as resource management policy is formulated. Political policy decisions conducted in the absence of a thorough knowledge (which the Chief can help provide) of the technical, economic, legal, political, social, historical ramifications of such policy are not apt to produce good results.

The Chief, and in turn the Forest Service, should be consulted on any policy or activity that he or she is expected to execute. (Timber Association, Medford, OR - #13658.41200)

ALASKA'S POLITICAL DELEGATION SHOULD NOT DICTATE PUBLIC LAND MANAGEMENT

This is the chance to do things right. Do not let Alaska's political delegation dictate management of MY PUBLIC LAND! (Individual, No Address - #1973.41000)

I think it is high time that the USFS manages the Tongass like a national forest rather than being dictated to by the Alaska congressional delegation who seems to be able to force you into discarding good science and the lessons learned in the lower 48 and treating this "National Crown Jewel" as simply fiber, a commodity and as a separate entity from the rest of the USFS system. (Individual, Bonners Ferry, ID - #4227.41200)

ENSURE THAT PROGRESS WILL NOT BE UNDONE BY A FUTURE ADMINISTRATION

I hope that the good that may come from this process will not be undone by the next (or future) presidential administration (since this process is being done via the administrative as opposed to congressional approach). (Individual, Boise, ID - #380.41100)

2.2.2 Role of the Forest Service

Some remarks by the public reflect opposing viewpoints on the role of the Forest Service in the decision-making process. Some feel the Forest Service is within its authority to implement the proposed rule. As one respondent observes, "I've heard some people say it today at the hearing, is that the Forest Service is exceeding its authority and side-stepping Congress by trying to enact this policy. And I'd like to disagree with that as well. There is no law that prohibits the Forest Service from protecting roadless areas or deciding that it doesn't want to build more roads." Others would like clarification of the Forest Service's authority with respect to certain issues. Some would like clarification of both the Forest Service's authority to designate conservation reserves and of the total acreage therein. Others ask for clarification on its authority to close access and/or block county roads.

Public concerns relating to the role of the Chief of the Forest Service in the decision-making process reflect a desire for a view independent of politics. Recommendations to this end include the suggestion that the appointment of the chief overlap administrations, and that the chief be able to speak independently from the administration at budget hearings and assume full responsibility for the agency and the results produced. As stated by one individual, “The Chief should be solely responsible for carrying out policy and directing activities of the FS. Within legal and policy boundaries, the Chief should be solely responsible for staffing, operations, and results. Micro-management by Administration political appointees is contrary to any set of management principles with which I am aware.”

Public Concern: The Forest Service is within its authority by proposing this rule.

I’ve heard some people say it today at the hearing, is that the Forest Service is exceeding its authority and side-stepping Congress by trying to enact this policy. And I’d like to disagree with that as well. There is no law that prohibits the Forest Service from protecting roadless areas or deciding that it doesn’t want to build more roads. There is a law that requires the Forest Service to only build roads when it can properly maintain them. And currently it has an 8.4 or 8.6 billion-dollar backlog of road maintenance needs. So in a sense, if you build more roads knowing that you’re not going to maintain them properly, then you’re not really acting in accordance with the law. (Individual, Laramie, WY - #21771.93610)

Public Concern: The Forest Service should clarify its authority to designate conservation reserves.

Where is the authority for designating “conservation reserves”? 2) What happens when an ecoregion is significantly altered by a catastrophic fire--one that burns 50,000 acres in a roadless area? Would it be the intent to close other areas to maintain the acreage in conservation reserves? 3) What do other land management agencies contribute to these numbers? 4) What effect will designating these areas as “conservation reserves” have on local communities who depend on commodity and non-commodity uses of the national forest? Relief: The Forest Service must address these questions, particularly the question regarding the authority to designate “conservation reserves.” (County Elected Officials, Worland, WY - #16185.83410)

IDENTIFY TOTAL NATIONWIDE ACREAGE

Comment: Page 3-52 and 3-53--On Page 3-48, the discussion of Ecoregions specifies that 12% of a county’s land mass be designated as conservation reserves. However, the discussions on Page 3-52 and 3-53 refers to 12% and 25% thresholds. What is the proper figure? It would be helpful to disclose the contributions of other agencies and private land holdings on the total acreage and roadless acreage within the 83 ecoregions within the continental United States. (County Elected Officials, Worland, WY - #16185.83410)

Public Concern: The Forest Service should clarify its authority to close access.

Do you have the deed to the land you wish to make roadless? Did the state of Utah sell you that land? Did you purchase the land with the consent of the Utah Legislature? Basing the Forest Service action on the Reservation Act of 1907 does not give the FS the authority to violate Article 1, Section 8 of the U.S. Constitution nor does it give the FS ownership of the land. Therefore you have no right to close any roads or create any Wilderness areas in land you do not own.

Can you produce the deed to the Manti-LaSalle or any other land in question? Can you produce documentation that you own the land with the consent of the Utah (or any other State) Legislature? If so, let us see it in open meetings with verification. (Individual, Manti, UT - #1417.50000)

CLARIFY AUTHORITY TO BLOCK COUNTY ROADS

Today June 2, 2000, I took my daughter fishing near Monty campground on the lower Metoious River. About 100 yards upstream from the entrance to Monty campground we encountered a locked gate with a sign saying something about a new roadless designation and closure of this road. It also said it would nominally be opened on May 18. I am disabled and would have obvious difficulty going further, but my concern is that my daughter will not have the benefit of the access we have been accustomed to for many many years. My main point of interest is that this road was county built and maintained and I am wondering about the right to block access. I have seen the county road grader on this road several times myself. (Individual, No Address - #2049.10213)

The roads that are there and that will be built in the future, after construction or reconstruction, should be put in the care and maintenance of the County in which they lay, but roads shouldn't be built in excess of the county's ability to finance the maintenance of them. (Individual, No Address - #2416.93610)

Public Concern: The political appointment of the Forest Service Chief should overlap changes in the administration.

The Chief is appointed by the administration in power through the Secretary of Agriculture. Traditionally, the Chief's appointment overlapped changes in administrations. Such was, to my mind, a good tradition. I hope that it is not dead. (Timber Association, Medford, OR - #13658.41200)

Public Concern: The Chief of the Forest Service should not be influenced by current politics.

Most decision makers at the top have been appointed and not promoted up through the ranks. (Individual, No Address - #1609.42000)

THE CHIEF SHOULD SPEAK INDEPENDENTLY OF THE ADMINISTRATION WHEN PRESENTING BUDGET REQUESTS TO CONGRESS

. . . when the Congressional budget committees consider the budget request, they are deprived of the advice of the Chief's office. I was clearly "discouraged" from presenting views contrary to the Administration's budget position. This has not been, in my opinion, a desirable development. The Congress should be able to rely on the Chief to give candid, forthright and complete answers to questions from any member of Congress. The Congress is entitled to the advice, assessment, and recommendations of the Chief representing the professionals that make up the Agency. The Administration can justify its actions related to the budget. Then the Congressional committees can do their job with full information at their disposal.

Better budgets aimed to achieve long-term goals and objectives would be the result. The best means of securing such a result would be to assure that the Chief can speak freely, completely, and promptly when asked for information, opinions, and advice. Any constraint on the Chief in this regard deprives the Congress (who also were elected by the people) of information and advice critical to their appropriate deliberations. (Timber Association, Medford, OR - #13658.41200)

Public Concern: The Chief of the Forest Service should be solely responsible for carrying out policy and directing the Forest Service.

The Chief should be solely responsible for carrying out policy and directing activities of the FS. Within legal and policy boundaries, the Chief should be solely responsible for staffing, operations, and results. Micro-management by Administration political appointees is contrary to any set of management principles with which I am aware. (Timber Association, Medford, OR - #13658.41200)

2.2.3 Role of States and Counties

The role of states and counties is a concern for many individuals both in and out of government. Some state elected officials specifically request Cooperating Agency Status. Even respondents who do not make that specific requests do maintain that states and counties should be given greater input and control over management of federal lands. Some go so far as to say national forests should be entirely turned over to states or counties to manage.

Counterbalancing that view is the concern that individual states should not have undue influence. “Please do not be swayed by the perspectives from Idaho; they are not the only ones with areas of National Forest!” remarks one individual. Respondents believe not only that states and counties should have greater input over management, but that other entities should, too. One individual suggests the Forest Service use input from research stations; another suggests an international committee be established to oversee the importation of foreign timber.

Public Concern: The Forest Service should address requests for Cooperating Agency Status.

Perhaps as both you and the President review this information, you will understand why we are concerned that the State of Wyoming’s request to be designated a cooperating agency on the roadless initiative, under the directives in the National Environmental Policy Act, may have been denied. I still have not received any formal written indication that our request has indeed been denied, and would request your assistance in stimulating a more positive reply from the Forest Service...I cannot understand how the Forest Service could assert that the State of Wyoming lacks jurisdiction, constitutional primacy, and the professional expertise to be a cooperating agency in this and other NEPA evaluations on issues which affect the State of Wyoming. The Forest Service would certainly benefit from our assistance. (State Elected Official, Cheyenne, WY - #2816.40200)

Chairman [Hayes] Gilstrap [of the Arizona Game and Fish Commission] specifically requested that the Arizona Game and Fish Department be invited to participate fully in the development of the EIS. I am writing in strong support of Chairman Gilstrap's request and urge you to include the Department as a full participant in the development of the EIS. The Department is a significant source of knowledge and expertise on land use issues in Arizona and the impacts that land use decisions have on wildlife in the state. Because the extremely arid nature of our state and the large amount of Forest Service land set it apart from others, it is vitally important that state experts with first-hand knowledge be allowed to assist in crafting the EIS. (State Elected Official, Phoenix, Arizona - #18119.40200)

Cooperating agencies should also include each state government, the State Association of Counties for each western state or, at least, the National Association of Counties. (Mining Association, Reno, NV - #15907.40200)

Public Concern: Individual states and counties should be given greater input and control over forest management on federal lands.

Individual States should have more input and control over usage and management of our forest areas. (Individual, Nezperce, ID - #589.52200)

To ensure appropriate federal-state agency cooperation and wildlife management on USFS lands, the Department [Arizona Game & Fish Dept.] requests specific reference to the jurisdiction of the state wildlife agencies and recognition of the states as full natural resource management partners in the management of USFS lands and resources. (State Agency, Phoenix, AZ - #44003.40200)

My opinion is the Forest Service does a terrible job in managing forests and should be reorganized or removed and have the States manage the land. (Individual, No Address - #477.41200)

Public Concern: National Forest Systems Lands should be turned over to the respective states or counties.

I believe the state property should be decided by the respective state's legislature. (Individual, No Address - #1610.41400)

I am asking my Wyoming congressional members to initiate legislation to place these public land holdings and policies under the responsibility of the individual states. (Individual, Lovell, WY - #2761.41600)

In my opinion, the decision on how to manage these Roadless Areas should be left to the individual states and their respective elected representatives. The current process completely bypasses Congress and our elected officials and is, therefore, not legal. (Individual, Missoula, MT - #1233.41300)

All Forest and BLM lands should be turned over to the states as the constitution requires. (Individual, Wellington, NV - #6075.52200)

The public lands should be turned over [to] the Montana Dept of Lands to be managed. All the moneys received should go to fund state public education, primary, elementary, high school systems. (Individual, Kalispell, MT - #11391.93640)

With the exception of a district (not exceeding ten miles square) for the seat of government, and all places purchased by the consent of the legislature of the States in which the same shall be (purchased) for the erection of FORTS, MAGAZINES, ARSENALS, DOCK-YARDS, AND OTHER NEEDFUL BUILDINGS; render all title to public lands to the States as Constitutionally provided. (Individual, Phoenix, AZ - #1797.41000)

I...feel we should dissolve the Forest Service, and give the forests back to the Counties that they are in, to be managed properly. (Individual, Ironwood, MI - #2903.41600)

Please do not be swayed by the perspectives from Idaho; they are not the only ones with areas of National Forest! (Individual, No Address - #16578.41000)

Public Concern: The Forest Service should use input from research stations and sustainable agriculture policies.

Government agencies do not take advantage of the information initiatives generated by their own agencies. Don't you have the input of your agricultural research stations or your sustainable agriculture policies? (Individual, Greenville, NC - #3170.42000)

Public Concern: An international committee should be established to certify that timber is harvested in an ecologically sound way; the import of non-certified timber should be prohibited.

I would like to see an international committee established to certify timber as being harvested in an ecologically sound way and the import of non-certified timber from foreign countries banned. (Individual, No Address - #1766.93300)

2.2.4 Role of Citizens

Respondents' comments in this section reflect our roots as a democracy and the basic belief that all citizens have a voice. However, the specific role citizens should play in the process depends on the citizen one asks. One view is that our current laws reflect the will of the people and that only a change in law could legitimize the proposed rule. Others ask for more citizen input but fail to specify what that means. Yet others recommend a national vote to let the people decide, while some respondents insist various stakeholders have been ignored.

A number of individuals maintain that the concerns of the majority should take precedence over those of the minority. Paradoxically, respondents for and against the proposed rule refer to polls that claim 'a vast majority' for their point of view. (Many of the sample comments which appear in this discussion reference specific issues that can also be found in other chapters in this summary. They are included here to show the disparity in people's perception of where the majority opinion lies.) Other respondents argue that if the Forest Service is going to make use of polls and surveys, they should use legitimate, objective surveys.

Public Concern: The Forest Service should consider that existing laws reflect the will of the people.

Chief Mike Dombeck in his "The State of the Forest Extending our Land Ethic" address pleads with the public to "engage...make your views known." This is a beautiful plea and indicates how the Chief thinks. The fact is in this Republic called the United States the will of the people is expressed in the laws of our Country. If we do not like the way the laws are written, we should change them, not take public comments and circumvent them. The 360,000 responses to the roadless Area Notice of Intent is about .001% of the population of 275,000,000. This is hardly an indication of the will of the people, even if all the comments supported the same alternative. (Individual, Fairfield Glade, TN - #303.41500)

Public Concern: The Forest Service should consider citizen input when making management decisions.

We the people must have more input into the management of our forests. (Individual, Placerville, CA - #1237.41500)

I wish that the USDA Forest Service would remember that all of us own these forests and should have a say-so in the care of them. (Individual, Kenton, MI - #3570.41500)

These lands belong to the people of the United States and truly to the people of the world! No corporation or bureaucracy has the right to subvert this. (Individual, Reston, VA - #6071.41600)

CONSIDER A NATIONWIDE VOTE

Our nation was built on the premise that its citizens have a voice. In this instance, that voice has been taken away, replaced by an executive order to implement a policy regardless of public opinion. A nationwide vote should take place to let the people decide how the lands on which we pay taxes are managed. (Individual, No Address - #2218.41000)

Will a vote on the rule be considered? (Individual, Pocatello, ID - #2959.44000)

CONSIDER STAKEHOLDER CONCERNS

[The Roadless DEIS] should be withdrawn because it ignores stakeholder concerns. (Timber Company/Association, Winston, OR - #2138.41510)

Public Concern: Some polls indicate a majority of people are fervently against closing public land from wise recreational use.

Public land is owned by the people of the United States. Poll after poll in USA Today show a vast majority of people against closing public land and instead keeping it open for wise recreational use...Mr. Dombeck, have the courage and integrity to stand up against Clinton and his radical environmentalists. Serve the majority, and keep public land open. (Individual, Little Hocking, OH - #2428.10212)

Public Concern: Some polls indicate most people fervently support protection of roadless areas.

Polls have shown that the vast majority of the American public favors strong, permanent protection for these unroaded areas. The Forest Service needs to start serving the interests of the American public and stop giving in to the private interest groups who seek to exploit our national forests for their own benefit. (Individual, Richland, WA - #1006.41700)

Recent polls have shown strong public support for protection of roadless areas. For example, a Mellman Group poll last summer found that more than 70% of voters favored prohibiting logging, oil drilling, and mining in national forest roadless areas. 75% favored a plan that would not exempt any of the national forests from protection. It's time to put aside the original stated purpose of the National Forest System, and to realize that the public is now demanding a different vision for the land under this jurisdiction. (Individual, Medford, MA - #1331.41200)

THE MAJORITY FAVORS PROTECTION OVER COMMERCIAL USE.

According to a 1995 national poll conducted for the U.S. Forest Service: 65 percent support increased regulation of commercial use of public forests. Some 38 percent strongly agreed. 79 percent agreed that long-term health of public forests should not be compromised by short-term need for natural resources.

Kaset International, which conducted the poll, said "The responses indicate that the overriding concern of United States' residents is maintaining healthy public forests and grasslands," and that most believe that this is "somehow tied to the quality of life in this country. The public does not seem willing to sacrifice the health of the forests in order to produce consumer goods or increase profits to private companies." (Individual, Osburn, ID - #2887.84000)

Destruction by all of the above (roads, logging, ORV, mining...) activities has escalated in recent years, particularly motorized vehicle use. Majority opinion is firmly on the side of wilderness and environmental values over the desecration of the intrusive activities noted above. It is imperative that government agencies respect and respond to the majority values. (Individual, Bozeman, MT - #8395.41500)

Why should a select few be allowed to plunder our remaining National Heritage. Let those select few grow and harvest rather than steal what belongs to the American People. (Individual, Hagerstown, MD - #4124.41720)

Times change and every set of changes has its temporary winners and losers. Open pit mining is no longer ok, and open pit miners are forced to deal with these changes. So be it for the manner in which the timber industry has operated on our national lands. The exploitation of our forests, by the combined forces of industry and paid-for legislators, must be balanced. (Individual, Missoula, MT - #6944.41720)

The Forest Service has not been successful in trying to control these [destructive] forces particularly under Congressional pressures. So now, with the roadless plan, there is a chance to stop this unnecessary forest and biodiversity destruction. Let democracy and the general public prevail instead of minority rule of our national forests. (Individual, Polson, MT - #8681.41720)

Two things have become clear. First, the public supports environmental protection; loves fish and wildlife, etc. and won't tolerate federal agencies charged with conserving resources clearly degrading them. Second, advocates of parks, monuments, Wilderness, and similar designations have argued convincingly that such designations are in the interest of the environment. Do the math. (Individual, No Address - #5137.41000)

Public Concern: The Forest Service should use objective surveys rather than the existing questionable surveys.

In the social and economic factors discussion (DEIS 3-160-209) reference is made to “numerous national surveys” indicating that the majority of Americans support more wilderness, road prohibitions and no additional timber harvest. Of course you can support any action you wish to take with surveys slanted to prove a particular agenda. The Forest Service did not conduct its own objective survey with non-leading questions, using instead existing surveys of questionable applicability. It is difficult to believe that informed Americans would support the positions these surveys portend to indicate. (Individual, Federal Way, WA - #19134.93100)

The Forest Service is fond of saying that management direction is not determined by a voting process, yet this action is predicated on the assumption that the “majority of Americans” want it, based on questionable polls conducted by various special interests. That is indeed no way to manage our national forests. (Individual, Colorado Springs, CO - #59459.41700)

2.2.5 Role of Special Interest Groups

The role of special interest groups concerns many respondents. It is felt that the Forest Service should not allow special interests to unduly influence or appear to influence public land management decisions. Proponents of the proposed rule warn against the influence exerted by corporate interests. As one individual puts it, “The public lands of the West (including roadless national forest lands) belong to ALL the people of the country, not just the people in the nearby rural communities, or within the state. Local timber/livestock/mining interests have had a disproportionate influence, which has hindered the move toward more preservation and recreational use – which the majority of people seem to favor.” In this vein, some respondents assert that it represents a conflict of interest for the Forest Service to accept funds from OHV groups. Others maintain that only those concerned about forest health should be allowed to influence policy making. Remarks one individual, “Corporate interests too often pose as local interests and hijack policymaking.”

Conversely, opponents of the proposed rule denounce the influence of environmental groups. Indeed, among opponents this is one of the most frequently cited, emotionally charged concerns. Asserts one individual, “Entirely too much attention is being paid to the Sierra Club and other radical environmental groups that even want to tear down the existing infrastructure of our nation. This is not in the interest of the public or even good for the long-term health of the environment.” Additionally it is suggested that the proposed rule is the result of environmental attacks on forest policy. As one representative of the timber industry maintains, “This plan is the result of a ruthless attack by the environmental industry on the validity of forest management.

The environmental industry incorrectly believes that a timber sale is a license to do anything in the forest. This is simply not true. Forest management works . . .”

As noted above, this belief that environmental groups are unduly influencing the process is not an isolated sentiment. People genuinely believe they are purposefully left out of the deliberative process in deference to large interest groups (generally, per this argument, environmental groups). Thus many urge the Forest Service to consider the interests of all recreational user groups, “. . .not just environmentalists and federal employees in Washington, D.C.”, including OHV users.

Public Concern: The Forest Service should not allow special interests to unduly influence or appear to influence public land management decisions.

Do not buckle under pressure from industry or its puppets in Congress. Congress has proven itself unable to follow the will of the people over the temptations of \$\$\$ from industry. The agencies appointed to watch over the land of all United States citizens must help counterbalance the greed in Congress. (Individual, Wilson, WY - #16613.41300)

DO NOT ALLOW UNDUE INFLUENCE FROM COMMERCIAL AND EXTRACTIVE INTERESTS

The public lands of the West (including roadless national forest lands) belong to ALL the people of the country, not just the people in the nearby rural communities, or within the state. Local timber/livestock/mining interests have had a disproportionate influence, which has hindered the move toward more preservation and recreational use – which the majority of people seem to favor. (Individual, Boise, ID - #380.91500)

People are getting very discouraged with the current political situation, and creating a plan to “save” our forests through legislative loopholes, waivers, and exemptions for certain well-monied corporate interests will NOT be a step in the right direction. (Individual, Sunnyvale, CA - #3359.41000)

I’m sick of seeing our public lands given to the purpose of profit for corporate entities and the politicians they own!! (Individual, Casselberry, FL - #3072.41700)

Don't cave in to the pressures of the wealthy industrial lobbyists. Our National Forest roadless areas need immediate and lasting protection. (Individual, Somerset, NJ - #3215.41000)

Please don't be influenced by our politicians who always act in favor of the logging and mining industries. (Individual, Coeur D'Alene, ID - #934.41700)

I am also extremely disappointed to learn that logging (without the use of new roads) will still be allowed on the approximately 60 million acres. This again is an illustration of the U.S. Forest Service bending to the pressures of the logging industry. (Individual, No Address - #2307.41720)

It is my opinion that this approach is either short sighted or deceptive. It appears to camouflage the intent of Forest Service policies that support extensive timber exploitation in yet undisturbed public lands. The proposal claims to protect National Forests by implementing a moratorium on the building of roads within inventoried roadless areas. This policy, however, offers no protection for the forest within roadless areas. (Individual, Arvada, CO - #7516.43000)

The Tongass NF also received the “Golden Fleece” award by Senator Proxmire in 1986 for the classical example of “log rolling” the USFS and Congress [denied] the public, while the lumber companies got all the logs at taxpayers’ expense (in Congressional Record). (Individual, Juneau, AK - #11362.43000)

Considering that both the Winema Forest Service and the developers secretly and knowingly violated two federal laws raises in my opinion the specter of collusion between the Winema Forest Service and Pelican Butte Corp./Jeld-Wen. Why would the Winema Forest Service assist ski area developers to violate environmental laws? Why is the Forest Service aggressively promoting Jeld-Wen's ambitious development schemes? Why have the Winema Forest Service and Jeld-Wen become such cozy bedfellows? (Individual, Klamath Falls, OR - #2741.42000)

DO NOT ACCEPT FUNDS FROM OFF-HIGHWAY VEHICLE GROUPS

My opposition to motor-speed OHVs is based on the following: The USFS should not be receiving funds from OHV offices. This is a conflict of interest. The USFS should be protecting our resources and providing stewardship. To my mind, the USFS credibility in this regard is stretched taut by its relationship with OHV interests. I believe the OHV lobby intimidates the Forest Service and BLM; I know I personally feel intimidated by this strong and vocal lobby. (Individual, Markleeville, CA - #236.41720)

ALLOW ONLY THOSE CONCERNED ABOUT FOREST HEALTH TO INFLUENCE POLICYMAKING

As far as local control, only those genuinely concerned with forest health who enjoy a symbiotic (as opposed to parasitic) relationship with the land (hunters, hikers, conservationists, etc) should have a say. Corporate interests too often pose as local interests and hijack policymaking. (Individual, No Address - #7596.41000)

DO NOT ALLOW UNDUE INFLUENCE FROM ENVIRONMENTAL GROUPS

The U.S. Government needs to continue to improve and add to the infrastructure of this country. Entirely too much attention is being paid to the Sierra Club and other radical environmental groups that even want to tear down the existing infrastructure of our nation. This is not in the interest of the public or even good for the long term health of the environment. (Individual, Fountain Hills, AZ - #950.41700)

Environmental terrorism has no place in the making of public policy. (Individual, Kalispell, MT - #10409.41710)

The roadless area initiative is simply another extension of the radical environmentalist agenda to restore a supposedly pristine state of nature in all public lands, and prohibit any public use other than backpacking... When one attempt fails, they find another attack strategy. The publicly funded organizations like the Forest Service, BLM, State Parks and others seem to provide a compromise in each situation. However, the cumulative net effect of many compromises over a series of years is the reduction of access to the public lands. This is clearly evident in northwest Colorado when looking at the areas open now compared to the late 1970s. (Individual, Craig, CO - #663.41710)

Additionally I believe it would open the door to bizarre interpretations by fringe environmental groups wanting to restrict virtually all human access to our Forests and National Parks. Existing roads and access to trailheads will go unrepaired when these fringe groups threaten to bring suit under their interpretation of this act. (Individual, Fircrest, WA - #7625.41710)

And lawsuits threatened or enjoined by the environmental community or delayed approval of timber sales on state lands for blatant political reasons also devalue our lives and our communities. It has become so bad and so blatant that even environmental activists such as Professor Charles Wilkinson are beginning to wonder if they haven't take the issue of timber harvesting to an extreme with virtually every timber sale being protested. (Individual, Helena, MT - #10866.41710)

This plan is the result of a ruthless attack by the environmental industry on the validity of forest management. The environmental industry incorrectly believes that a timber sale is a license to do anything in the forest. This is simply not true. Forest management works. In a 1968 ceremony, the Forest Service commemorated the two billionth board foot of timber removed from the Black Hills National Forest. The Rapid City Journal noted in its June 23, 1968 edition, with the removal of the two billionth board foot, the Black Hills had produced as much or more wood that there was estimated to have been standing when logging started there in 1899. Today it remains a beautiful forest. This is an incredible testimony to the power of forestry, including road building, to serve the nation's economic interests while conserving its forest resources. Forestry is as powerful today as it was then. (Timber Company or Association, Roseburg, OR - #8293.93300)

Why are you caving in to the “Green Extremists?” (Individual, Powell Butte, OR - #8198.41710)

Without conflict the environmentalists don't rake in contributions. (Individual, Kalispell, MT - #12400.41710)

Public Concern: The Forest Service should consider the interests of those intentionally locked out of the planning process by influential special interests.

I feel that the people that want the public locked out, have had an insiders track during the planning process. Why are they consulted when the rest of us are left out of it. We are only told of public meetings that they have known about months in advance. (Individual, Midvale, UT - #5971.41700)

Public Concern: The Forest Service should consider the interests of all recreational user groups.

I think many of the recreational user groups need to be involved in the next forest plan revision. (Recreational organization, Knoxville, TN - #6914.41730)

Those whose interests [were] in recreation were not even so much as asked their opinion before establishment of the initiative. (Individual, Canon City, CO - #1103.43000)

...the F.S. should begin to have some form of “Public Overview Board” that is made up of local citizens that would give some form of leadership on what roads the public wants open and what direction the F.S. should be going on harvest numbers, areas, and future cutting prospects. The Board should also assist the F.S. in formulating a 10 year or 15 year Plan. This Board should be made of hunters, hikers, fishermen, loggers, etc., not just environmentalists and federal employees in Washington D.C. (Individual, Noxon, MT - #3405.41600)

INCLUDE THE OFF-ROAD VEHICLE COMMUNITY

I am a responsible tax-paying citizen who happens to be an off-road motorcycle enthusiast and I am against a policy that would ban me and the several million other off-road vehicle enthusiasts from using the trails in our beautiful national forests. I believe the off-road vehicle community should have a voice in shaping proposals of land use that works for all users. (Individual, Andover, CT - #933.10212)

Many national and state off-highway recreation organizations have worked hard to promote responsible use of our public lands. Often times these efforts have included collaborative projects with the Forest Service. When considering changes to any Travel Management Plan, you must include national off-highway groups such as The American Council of Snowmobile Associations, American Motorcyclists Association, Backcountry Horsemen of America, Washington State Snowmobile Association, and the Blue-Ribbon Coalition. In my opinion, without active consultation of these recreational groups, you are violating the public trust in our Forest Service. (Individual, Granite Falls, WA - #9264.72200)

2.2.6 Local versus National Decision-making

The question of whether forest management decisions should be made at the local level or the national level evokes highly polarized responses. In general, those opposed to the rule believe management decisions should be made at the local level, while those in favor believe they should be made at the national level.

The Forest Service has a long history of local involvement through the forest planning process, yet it has always operated under federal legislation. Due to the history and structure of the Forest Service many feel that “land use policies should be made by the local experts and people who use the public land. The local land managers are familiar with the problems, and have solutions tailored to their specific situations.” Many of these respondents believe effective collaboration can only be achieved at local levels, where common ground can be identified and workable solutions offered.

Opponents repeatedly point out that local managers are in the best position to create solutions because of their local knowledge of the resources and the community.

Furthermore, while acknowledging that these are national forests for all to use, it is argued that “those who are most affected should have the greatest say. Someone who lives 3000 miles away and will never visit should have less say as to what happens locally.” Respondents thus urge the Forest Service to adopt the No Action Alternative in order to ensure continued local control and to allow the implementation of locally developed forest plans. As respondents point out, Forest Service plans developed locally directly address each areas’ specific management needs. The Northwest Forest Plan is one such plan that respondents desire implemented. As one individual insists, “After many exhausting years of forest management plan development, you choose to ignore those management plans to implement this flawed proposal. The agriculture and cattle industry is being totally ignored and the ‘one-size-fits-all’ proposal is nothing but a Washington power play.” In addition, individuals, business associations, and timber companies all point out that forest supervisors have the expertise and knowledge to manage roadless areas and should be allowed to do so.

In short, those opposed to the proposed rule believe management decisions should be made locally. They believe that local managers are in the best position to work out wise and workable policies to address conditions specific to their area, and that it is only fair that the people who use the land and are most affected by management decisions governing it should have a say in making them.

Those in favor of the proposed rule see things differently. The vast majority of proponents are absolutely convinced that a national policy is exactly what is needed. Influence from local interests will not, in these individuals’ opinion, serve the best interests of the forests. As one individual observes, “Unfortunately the state I consider my home is not environmentally enlightened. Therefore, we need federal initiatives such as ending road construction and logging in the east Texas woods to protect Texas forests from ourselves.”

Moreover, some writers believe the Forest Service cannot be trusted to implement real protective measures at the local level. Local managers, these respondents assert, are not likely to be able to withstand pressure from local business interests. As one individual points out, “I support roadless areas in our national forests and question the effectiveness of allowing local managers to determine their future. Though less federal involvement is preferable in other areas, the “quick buck” will often win out when local managers are faced with decisions about recreational access and logging. Protecting what is left of our national heritage not only for humans but also for those species attempting to survive with us, is a job only Federal government can assure.”

Respondents also argue that local managers are prone to be sympathetic to local economic needs, and that the promotion system in the Forest Service rewards managers “on the basis of how much logging their districts have done.” Respondents claim as well that national direction is needed inasmuch as local planning efforts have failed to resolve these issues.

Not only do proponents believe local managers cannot be trusted to implement the proposed rule, they believe the final rule should prevent local managers from circumventing the intent of the rule. This should be done by providing specific, clear, and concrete criteria for implementation; by setting national policy for OHV use; and by preventing local managers from constructing roads for the purpose of blocking future roadless consideration.

In summary, there is a significant trust issue on both sides of this debate. Those opposed to the proposed rule do not trust the national leadership to be responsive to local needs; those in favor do not trust the local managers to protect the land. While most concerns regarding this issue are thus highly charged, some respondents write simply that clarification is needed on some points related to decision-making. Some assert that it needs to be clearly disclosed that, be it at the local or national level, it is the Forest Service that will be implementing this rule, not some third party entity. In addition, some individuals believe the Forest Service should clarify who is actually in charge at the local level.

Public Concern: Management decisions should be made at the local level.

We particularly object to any NATIONAL DECISION made on road construction and maintenance in these areas. Local managers with local citizen input should make these decisions. (Business/Business Association, Boise, ID - #75.41000)

An important point for the determination of roadless area conservation is to let local managers do the job they were hired to do. It is important to know what the public wants. It is our National lands. Policy should rightly be directed by the public, rather than by the leanings of the executive branch of our government. (Individual, Obrien, OR - #17546.41240)

Land use policies should be made by the local experts and people who use the public land. The local land managers are familiar with the problems, and have solutions tailored to their specific situations. (Individual, Logan, UT - #7174.41240)

I favor fewer roads in the mountains, but I think that local managers should be allowed to manage the land according to the needs of the forest health and the human ecosystem. (Individual, No Address - #7045.41240)

Working on a watershed-by-watershed, forest-by-forest basis, local people can come up with local solutions. The Range Advisory Councils (RAC's) created by BLM have done this in other areas of our state. They have demonstrated that local people can come up with local solutions probably 80% of the time. And the other 20% of the time, responsible public officials should be able to act in a reasoned and responsible manner.... (Individual, Helena, MT - #10866.42000)

Local management is also key to maintaining the health of the national forest lands. Allowing local managers to make decisions concerning activities in their respective regions, such as trail access, hunting, fishing, and fire suppression measures. Who better to determine the needs of the land than the people who live there! (Individual, Arvada, CO - #5669.43000)

Many of the issues that concern us can be managed on a local level. Yes the land is for all to use. But those who are most affected should have the greatest say. Someone who lives 3000 miles away and will never visit should have less say as to what happens locally. (Individual, Ephraim, UT - #1511.41510)

We acknowledge the need for sensible rules to protect pockets of rare plants, archeological sites, some wild caves, wildlife winter ranges, some stands of old-growth timber, and fragile habitats. We prefer that these protections be administered locally, on limited tracts of land, seasonally, or on a case-by-case basis. Local Black Hills National Forest decisions regarding resource management have generally been sensitive, wise and prudent. Broad wilderness or roadless empowerment, on the other hand, is often oppressive. The conflicts seem to occur when federal standards for managing "big mountains" are imposed upon the little mountains of the Black Hills. One size does not fit all. (Individual, No Address - #7865.41600)

If this proposal is adopted, the Clinton Administration will have been successful one more time in driving a wedge between urban and rural America in order to leave a "legacy." It is unfair to rural America to make them have to carry the burden of this legacy. I urge that this proposal not be adopted and that the Administration work with Congress and local governments to develop responsible management policies. This top-down, elitist proposal is bad policy, and bad government. (Individual, Salt Lake City, UT - #6753.41000)

We were told too that decisions are made at the local level and we would like that same assurance from the Deschutes National Forest. (Individual, La Pine, OR - #6739.41240)

Local level forest planning has worked in developing forest plan decisions by the people most knowledgeable about the forest lands. The proposed one size fits all proposal undermines the cooperative dialogue that takes place during each forest plans revision and cancels out years of hard work and studies. (Individual, Indian Mound, TN - #6353.41200)

ADOPT THE NO ACTION ALTERNATIVE TO ENSURE CONTINUED LOCAL CONTROL

We request that you adopt Alternative 1, no action, no prohibitions and Alternative A, no action, no procedures. These alternatives allow for local flexibility and planning in response to local conditions, to decision making by those most knowledgeable about local conditions and needs, and provides the greatest opportunity for local cooperation and collaboration. They allow for conformance with existing and revised forest management plans which have been developed after much work, study, and money spent and with local input. And they allow for conformance with federally mandated multiple use/sustained yield act and the National Forest Management Act. (Individual, Markleeville, CA - #13284.61100)

Our group favors alternative 1, with the addition of having local people, citizens, along with the local Forest Service personnel form partnerships to determine roads needed or not needed on a local basis. This blanket across the nation, CLINTONIAN dictatorial approach, is not what will in the long run be wise management of the land. Management at the local level through collaboration seems a wiser approach. (Grazing Organization, Amindon, ND - #8122.41240)

As I study the alternatives proposed in the Draft EIS for Roadless Conservation, the glaring question that comes to mind is why is the F.S. arbitrarily tying the hands of the forest planning? Don't you believe they have the ability to recognize, on the ground, where environmentally sound roads can be built when needed to manage the forest? (Individual, Fairfield, Glade, TN - #303.41200)

[PVOA supports] PROHIBITION ALTERNATIVE #1. Many groups and individuals have participated in the existent planning processes in good faith. Despite assertions to the contrary, the proposed rule will in fact override land use designations that have emerged from those processes. It should be noted that the general public (nation-wide) presently has opportunity to participate in existent planning processes. (Business/Business Association, Petersburg, FL - #7542.44000)

IMPLEMENT EXISTING LOCALLY DEVELOPED FOREST PLANS

After many exhausting years of forest management plan development, you choose to ignore those management plans to implement this flawed proposal. The agriculture and cattle industry is being totally ignored and the “one-size fits all” proposal is nothing but a Washington power play. (Individual, Redding, CA - #1118.44300)

I believe the Forest Service has done an excellent job in managing the forests on a local level. I do not believe that a Washington based, one-size-fits-all national policy is in the best interests of our forests or for the people who use them. (Individual, Westboro, MA - #331.41200)

Extensive planning has already been accomplished for these Alaska Forests and many millions of dollars and countless man hours of volunteer participation to craft the compromises reached in the existing planning documents. To disregard the work accomplished which was done with National interests as well as the various aspects of State and Local interests is an insult to the people that took their valuable time to help craft planning documents that would obtain the best utilization compromise for the hotly contested resources of the Tongass National Forest. (Individual, Wrangell, AK - #1042.44300)

I am against the current hurry up method that is being used to shut down access to our national forests. Each forest has its own master plan, why can't each forest develop over a longer and more thorough time frame their own plan, based on the needs and historical usage of the area. (Individual, No Address - 2256.44300)

The theory behind roadless values may be sound, but there are serious problems in the practical implementation of this proposed rule. Many of these problems could be alleviated in our area if the Forest Service could return to a consistent and funded implementation of the Northwest Forest Plan. (County Elected Official, Yreka, CA - #13551.64251)

FOREST SUPERVISORS SHOULD MANAGE ROADLESS AREAS

. . . the Idaho Farm Bureau Federation believes the local Forest Supervisors of the USFS have the knowledge and expertise to manage the National Forests in Idaho. This state does not need a top down management scheme imposed upon them to try to further some political agenda that has nothing to do with forestry management. (Business Association, Boise, ID - #6472.41240)

The details of these proposed rules are identified in the Federal Register, Volume 65, Number 43, pages 11676 - 11693. These proposed rules specifically prescribe the management of inventoried and uninventoried roadless and unroaded areas. Such rules will severely limit local forest supervisors in applying necessary resource management actions. (Timber Company, Libby, MT - #6709.412409)

My desire is for the Roadless Areas of Montana to be returned to the management of the U.S. Forest Service, and that they, in consultation with the local communities, decide what to do with areas in the next round of individual Forest Plans. Any intrusion of the Washington Establishment in this process is unacceptable. (Individual, Missoula, MT - #1233.41240)

Public Concern: Management decisions should be made at the national level.

Unfortunately the state I consider my home is not environmentally enlightened. Therefore, we need federal initiatives such as ending road construction and logging in the east Texas woods to protect Texas forests from ourselves. (Individual, Houston, TX - #7574.41000)

FOREST SERVICE CANNOT BE TRUSTED TO IMPLEMENT LOCALLY

If on the ground monitoring is any indication, the U.S. Forest Service cannot be trusted to implement scientific based conservation measures without national guidance. (Wise Use Organization, Clarion, PA - #8414.42000)

I support roadless areas in our national forests and question the effectiveness of allowing local managers to determine their future. Though less federal involvement is preferable in other areas, the “quick buck” will often win out when local managers are faced with decisions about recreational access and logging. Protecting what is left of our national heritage not only for humans but for those species attempting to survive with us, is a job only Federal government can assure. (Individual, HammondSport, NY - #3558.41000)

The Washington Office of the Forest Service should establish direction, regarding protecting desirable characteristics in inventoried roadless areas and other roadless areas, for the wildlife species that inhabit the area. This decision is too important to leave to the whim of each local manager and to the influence that local communities could have on the decision of the local manager. Past experience has proven that left to the local managers, there will be loss of wildlife habitat, decline in wildlife species populations, and loss of the fire prevention characteristics of the forest. (Environmental/Preservation Organization or Association, Weldon, CA - #16041.41200)

I do not believe that the proposal goes far enough in preserving national forests. It has several flaws, among which are: REGIONAL FS MANAGERS MAKING THE JUDGMENT CALLS--this would be problematic. In the past, when regional managers have been allowed to do this, the local business interests (logging, mining, cattle--whatever the business) have been able to exert local political and economic arm twisting. Because they can do this, they basically get a free ride on the public land. Local FS Managers are more susceptible to this than a national policy would be. (Individual, Seattle, WA - #2203.41200)

Do not let local forest supervisors set any rules. Many of them are from logging families and therefore they are supportive of logging. Most of them live in small towns and naturally are sympathetic to their local friends in setting quotas, etc. Of course they will be influenced by friends at coffee or church. What supervisor from a little town like Powers, Oregon could stand up to locals who need jobs? But national forests are not his forests. They do not belong to locals either. They belong to us all. (Individual, Bandon, OR - #2910.41200)

I am also extremely skeptical about involving local forest managers in deciding which areas should be protected as they have generally been promoted solely on the basis of how much logging their districts have done. (Individual, Port Angeles, WA - #7950.42000)

The four Procedural Alternatives are flawed because they all leave the future management of roadless areas in the hands of local Forest Service Administrators. This simply leaves the door open for confusion and mismanagement. What administrators need is a uniform set of guidelines with clear, strong protections for roadless areas. (Individual, Portland, OR - #11425.41240)

Leaving that decision up to a local Tongass Ranger does not make sense as we get a new one about every three to five years and they do not know the local people. By the time they (new rangers) acquire some of this knowledge they get transferred and the people suffer from activity [which] is easily construed to [be] a “rebuilding” activity which is prohibited. (Tribal, Ketchikan, AK - #13987.41240)

LOCAL PLANNING EFFORTS HAVE FAILED TO RESOLVE ISSUES

I also want to commend the Forest Service for the process being followed. These are NATIONAL Forests. The process being used recognizes that by focusing national attention on this issue. We have tried for more than 2 decades to resolve the roadless issue on a Forest-by-Forest basis through the Forest Planning Process. THAT EFFORT HAS BEEN A FAILURE. (Individual, Missoula, MT - #9393.44300)

Public Concern: The final rule should prevent local decision makers from circumventing the intent of the rule.

Leaving future designation and management rules entirely up to the discretion of local officers means that as Supervisors or District Rangers come and go, subject to local pressures and situations, the long-term stewardship mission may not be adhered to. (Individual, Springville, CA - #8040.41240)

The four Procedural Alternatives are flawed because they all leave the future management of roadless areas in the hands of local Forest Service Administrators. This simply leaves the door open for confusion and mismanagement. What administrators need is a uniform set of guidelines with clear, strong protections for roadless areas. (Individual, Portland, OR - #11425.41240)

BY PROVIDING SPECIFIC, CLEAR, AND CONCRETE CRITERIA FOR IMPLEMENTATION

The preferred alternative stipulates that the decision to change a forest plan designation would be in the hands of the local manager. At present, there is no clear-cut criterion by which the size of a parcel (or any other specific issue) can be understood as to the reasoning by which an area of land meets the Unroaded Classification. WE REQUEST THAT BEFORE ANY AUTHORITY IS GIVEN TO THE LOCAL MANAGERS TO APPROVE UNROADED CLASSIFICATION FOR ANY AREA THAT SPECIFIC, CLEAR AND CONCRETE CRITERIA ARE LISTED BY WHICH THE GENERAL PUBLIC WILL HAVE THE UNDERSTANDING OF WHAT IS BEING DECIDED, AND WHY. The less the subjective content of the issues being considered the better for all to understand the reasons. While we appreciate the fact that the decision making body will be local rather than dictated from Washington, too many questions remain unanswered. (Individual, Lake Tahoe, CA - #2113.64251)

BY DETERMINING OFF-ROAD VEHICLE USE

The draft EIS leaves decision making about ORV and snowmobile use to the discretion of individual forest plans. These uses are growing so rapidly and have such a strong and financially well-supported constituency that I am afraid they already have and will in the future be the predominant use of Forest Service lands. (Individual, Provo, UT - #8058.41700)

BY PREVENTING LOCAL MANAGERS FROM CONSTRUCTING ROADS FOR THE PURPOSE OF BLOCKING FUTURE ROADLESS CONSIDERATION

[T]he local decision-makers are uniquely hostile to protecting wild areas and are no more likely to support protecting roadless areas in four years' time; and, given their disposition, it is probable that the ensuing four years will be a race to road as many roadless areas as possible to prevent their consideration for future protection. (Individual, Seattle, WA - #10687.41000)

Public Concern: The proposed rule should clearly disclose that the Forest Service would be the ultimate decision maker.

FS is developing a framework for the local/regional FS offices to use in adopting multiple use plans for national forests. The fact that it is a local office of FS versus the national office of FS is inconsequential. In either event, FS will implement the rule, not a third party entity. Regardless of where the office is located, FS is making the ultimate decision of whether a road will or will not be constructed. The proposed rule clearly states that roads may not be constructed or reconstructed in the unroaded portions of inventoried areas of the National Forest System unless the road is needed for public safety, for environmental response or restoration, for outstanding rights or interests protected by statute or treaty, or to prevent irreparable resource damage. (Federal Agency, Washington, D.C. - #54012.41200)

There is further element of confusion and...inconsistency as to which responsible official is going to make the decision for the document. At the public scoping sessions, the Forest Service spokesperson identified the Secretary of Agriculture as the responsible person and the individual making the decision, but in the DEIS, the Chief is identified as the responsible official. Even as recently as this week on July 14, 2000, FS officials were identifying the Secretary as the responsible official is, it is difficult for the readers of the DEIS (the public) to comprehend or determine who is making the decision and what the appeal process, if there is one, will be. (Business/Business Association, Mammoth Lakes, CA - #44001.41000)

THE FOREST SERVICE SHOULD CLARIFY WHO IS IN CHARGE AT THE LOCAL LEVEL

With regard to this quote from your website: “overall, decisions about recreational activities...on National Forest System lands would continue to be made at the local level with full public participation.” Can you please tell me who is in charge at the “local level,” and how I will be able to participate in the decision making? (Individual, San Diego, CA - #97.44240)

2.3 Issues of Trust and Integrity

Throughout the hundreds of thousands of comments submitted on the proposed rule, concerns surrounding trust and integrity are among the most pervasive--expressed both implicitly and explicitly. Some respondents explicitly express their appreciation to the President for initiating this process and to the Forest Service, both for following through on the President’s mandate (albeit most believe the Forest Service has not gone far enough), and for the efforts the agency has made to involve the public. Many of the letters in support of roadless protection can be interpreted to implicitly trust the Forest Service and the rulemaking process. However, the vast majority of explicit expressions of sentiment on these issues comes from opponents of the proposed rule. These respondents express grave distrust over the integrity of the process, the forthrightness of the agency, and the motivations of the President.

Some respondents argue that the implementation of the proposed rule would only cause greater controversy and more appeals and lawsuits than present management evokes. Others claim that the release of so many initiatives in such a short time “serves only to confuse and frustrate the American public,” and that “this confusion was purposely orchestrated to further dissuade the American public from meaningful participation.”

It is mentioned again and again that politics has no place in public land management. Individuals, recreation organizations, and businesses see one or all aspects of the proposed rule as circumventing the established planning process. One individual requests a list of lobbyists and legislators who have contacted the Forest Service, saying the list is wanted “just so we’ll know who bought our forests cheaply.” Some proponents of the proposed rule assert that the exemption of the Tongass National Forest is politically motivated. As one respondent protests, “What sounds like a compromise, i.e. we are not really leaving the Tongass out we are just going to look at it in a different time frame, is in fact a political expediency to placate the special interests concerned with logging in the Tongass.”

Respondents also write about other agencies. One individual asserts the Fish and Wildlife Service and the Forest Service need to be completely overhauled. “Maybe if we got rid of about half the people in both of these agencies,” this individual claims, “starting from the top down, things would change, and you all would listen to some of us, and not just the one side.” Some people also demand a complete investigation of the rulemaking process for developing this proposal be initiated, and that the whole process be stopped until said investigation has been completed. Finally, some respondents complain about both the behavior and public pronouncements of some Forest Service employees, and believe the Forest Service should take action.

Concerns regarding Misleading Information or Non-Disclosure are covered in Section 2.3.1, and concerns regarding the Use of Best Science and Assumptions are addressed in Section 2.3.2.

Public Concern: The Forest Service should realize the implementation of the proposed rule would cause controversy, appeals, and lawsuits.

According to your agency: Activities in roadless areas that alter roadless characteristics create public controversy, appeals, and lawsuits. (Individual, Moretown, VT - #7156.41000)

The roadless area plan in conjunction with the destruction of the dams, as well as recent EPA edicts, is a concerted effort by a group of elitists to control the populace for their own selfish purposes. History reveals it has happened before and will continue, until the elitists overreach and the populace rebels in some fashion. (Individual, Idaho Falls, OR - #7108.41710)

Stop the green curtain before it divides the country into loyal subjects and outlaws. (Individual, Medford, OR - #8197.41710)

Our Government has become so high handed in its policies, many are talking lawsuit or worse in rural areas. I write this as a concerned voter and leader. (Individual, Austin, NV - #6414.42000)

One of the stated objectives is to cut down on litigation. The proposed rules will not prevent the radical environmentalists from continuing to sue. Alternative B opens the door to additional suits by opening the possibility of including areas under 5000 acres. They will continue to pressure the Forest Service to close off all road access to the "roadless" areas. (Individual, Elko, NV - #8087.64220)

Public Concern: The Forest Service should not purposely cause confusion by separately releasing several documents that are inherently integrated.

As you are aware, it is impossible to adequately address the DEIS without simultaneously scrutinizing the many thousands of pages contained in the proposed National Forest Management Planning Rule (PR), and the Proposed Road Management Rule and Policy (ROAD RULE). The release and consideration of all of these proposals at generally the same time serves only to confuse and frustrate the American public, and discourages their participation. In light of the facts which were uncovered during the inquiry conducted by Natural Resources Committee this past spring, I believe this confusion was purposely orchestrated to further dissuade the American public from meaningful participation. Until the PR and the Road Rule are thoroughly studied, adopted and implemented, the Roadless Rule has no real relevance; it can not and should not be construed as a stand alone document. The principles underlying each of these documents are inherently integrated and must be considered as such. (Individual, Coalinga, CA - #6446.72200)

Public Concern: Public land management should not be politically motivated.

President Clinton's so-called roadless area initiative is a big waste of federal money and staff time, and a purely political attempt to circumvent the established planning process. Our forests should be managed by professional scientists, not politicians. (Individual, Gainesville, GA - #2155.41200)

PVOA supports PROHIBITION ALTERNATIVE #1: The use of a proposed rule to supersede existent planning processes sets a precedent of management based on political climate. Hopefully, forest management science will continue to evolve, improve, and change. Political climates are known to change much more rapidly but without consistency of direction. (Business/Business Association, Petersburg, AK - #7542.41000)

The Forest Service roadless proposal is a mockery of public trust. (Individual, Emerson, KY - #11238.42000)

It is no longer appropriate or conscionable to allow politics or vested interests to adversely affect the absolute protection of our forests/wild lands. (Individual, Arden, NC - #3040.41000)

This is another attempt to create political gain by presidential decree, bypassing scientific investigation, congressional due process and professional forestry. (Individual, Fall City, MN - #10560.41100)

The future of our nation's land is too important to be decided without sufficient public input and careful consideration of a long-term strategic approach to managing these resources. Lets focus on what's right for the future of our forests, and not just political policy right now. (Individual, Oroville, CA - #2846.44400)

In addition, we believe this "fast track" plan is designed to be implemented before the November elections and we're appalled that the future of our wild lands is being used as a political pawn. (Recreational organization, Redding, CA - #7388.44420)

This is a terrible--after the fact--attempt to justify a pre-selected course of action. Manage forests with real science NOT political science. (Individual, Troy, MT - #1294.43000)

You have gone to great lengths to show how unbiased you are by having multiple dog and pony shows all over the country on the issue. You say you really want to gather public opinion and do what the public wants. You say your minds are NOT MADE UP but it appears to me your MINDS ARE CLOSED. Why would I think this? Well as far as I have learned, which is difficult given the time and scope of the project, your proposal still allows logging in roadless areas. But now Al Gore comes out and says that when he is elected president there will be no logging in roadless areas. This whole process makes us sick from the beginning and you just keep on showing your true colors. Are we really supposed to think for one second that this is anything but a big political sham to get Clinton some good press and let Gore be a big hero? (Business/Business Association, Portland, OR - #2413.43000)

I do not believe you will do the right thing. I think the decision has already been made to close and shut it down. You are public servants, and you act like prison guards. (Individual, Colorado Springs, CO - #8432.42000)

This is merely the latest in a series of Clinton political initiatives designed to boost Vice President Gore's reelection prospects. I suppose no one should be surprised at the politicization of the U.S. Forest Service. After all, this Administration has used every federal agency from the IRS to the FBI to pursue its political agenda. (Individual, No Address - #2236.41100)

I suspect that the draft rules read as they do from some intense lobbying efforts by special interests. In the interest of fair and open government, perhaps a list of those lobbyists and legislators contacting the Forest Service on this issue should be appended to the final document, just so we'll all know who bought our forest cheaply. (Individual, Roswell, NM - #5106.41000)

I would like to see the Forest Service, and the Fish and Wildlife Service completely overhauled; maybe if we got rid of about half the people in both of these agencies, starting from the top down, things would change, and you all would listen to some of us, and not just the one side. It's too bad we can't work together on these problems, and all be able to enjoy our forest. But you and Mr. Babbitt, have made your choice, and for that I am sorry. (Individual, Eager, AZ - #6625.41000)

In trying to understand the degree of objectivity of the creators of this initiative, I looked at the employment history of the 23 members of the several committees. 21 of the 23 are current FS employees with an average of 19.76 years of FS employment! What that says to me is that these long-term employees began their FS work under management and policies that strongly pushed "get out the cut," and that outmoded policy is still, unfortunately, excessively rampant in the FS. (Individual, Spokane, WA - #4546.42000)

Please conduct a full public audit of the Forest Service. (Individual, Santa Barbara, CA - #17810.42000)

THE TONGASS NATIONAL FOREST EXEMPTION IS POLITICALLY MOTIVATED

What sounds like a compromise, i.e. we are not really leaving the Tongass out we are just going to look at it in a different time frame, is in fact a political expediency to placate the special interests concerned with logging in the Tongass. (Individual, Tenakee Springs, AK - #8123.41720)

I am outraged that the Tongass NF roadless areas will not be protected under President Clinton's latest proposal. Actually I believe that this decision was made by the Forest Service in collusion with the timber industry and its paid puppets, the Alaska Congressional Delegation. There exists 4650 miles of permanent logging roads on the Tongass which readily access billions of board feet of timber that was bypassed under the now defunct 50 year timber contracts (KPCEAPC). (Individual, Sitka, AK - #883.41720)

THE PUBLIC INPUT PROCESS IS A MEANS TO HIDE THE POLITICAL USE OF THIS INITIATIVE

I believe that this public input process is nothing more than a façade to hide President Clinton's attempts to build a favorable legacy. (Individual, No Address - #207.41100)

Public Concern: The Forest Service should delay the proposed rule until Congress completes its investigation of improprieties in developing the rule.

The entire roadless area conservation proposal needs to be stopped in its tracks until the committee on Resources-subcommittee on forests and forest health completes its investigation on the overwhelming improprieties that transpired in developing such a proposal. (Recreation Organization, Coalville, UT – #14657.72200)

In view of recent serious Congressional resource Committee and Subcommittee hearings, the matter of undue influence, potential violations of RICO, Sherman Antitrust, Foreign corrupt Practices and other Acts, and agency membership in the IUCN (which requires "non-conflict" with mandates not approved by Congress) is a reasonable concern with regard to motivation for this proposal (Business/Business Association, No Address - #54308.50000)

Public Concern: The Forest Service should instruct its agency employees to speak with sensitivity and forthrightness.

In a recent Associated Press story, the Forest Service is quoted as saying "this looks like a blatant red herring because what we are working on will not close a single road--not a single mile of road." I urge you to instruct your Agency spokesperson to speak with more sensitivity and forthrightness. I am personally offended by the name-calling reverted to in the AP story. Disabled Americans are not red herrings. (Local Community/Civic Organization, Washington, DC - #1663.42100)

When I was younger, it was always a pleasure to happen across a Ranger. They were always warm and friendly and seemed like people you'd like to know and have around. These days, US Forest Rangers seem to have an attitude problem. They are often rude, terse, arrogant, and overbearing to begin with. I once worked with a fellow who was like that. He wanted to be in a position of power so bad he applied to attend the California Highway Patrol Academy. I once told him, "Why bother, they won't take you!" He did graduate, but the CHP refused to hire him because of his attitude. I now ask you, "Is the US Forest Service hiring rejected Law Enforcement Academy graduates?" (Individual, Bishop, CA - #11278.42000)

2.3.1 Misleading Information or Non-Disclosure

A more specific issue directly related to trust and integrity is the allegation made that the Forest Service and administration are deliberately misleading the American public. As noted in a number of places throughout this summary, respondents question the data provided in the Draft EIS. Some believe the agency is disseminating “false reports that forests have regrown when they are hardly (if at all) replanted.” Others are incredulous at the claim that access will not be affected and believe this is the first step to closing average citizens out of the forests. One individual claims the public has been misled about mineral potential contained in RARE II inventories. Finally, respondents express a wide array of suspicions about possible hidden agendas.

In addition, respondents charge the Forest Service is misleading the public by including alternatives that would sanction uneconomical and inefficient commercial timber harvest. Says one individual, “You permit further commercial timbering, yet make it essentially uneconomic....This seems a little devious, don’t you think?” On the other hand, others ask whether the real goal of this proposed rule is to save ecosystems or to appease environmentalists while continuing to allow destructive activities. Another respondent asks whether the real goal is to ensure the closure of roads by eliminating records and changing definitions. Many suggest the real goal is to bypass Congress in establishing de facto wilderness areas. Likewise, many believe the real goal of this and other recent initiatives is to lock the public out of public lands. Finally, some suggest the Forest Service is in collusion with the United Nations to covertly implement international agreements with no regard for local needs and concerns.

Public Concern: The Forest Service should not disseminate false reports that forests have regrown when they are hardly replanted.

No new roads on any public forest land. No more vehicular use of roadless areas. No more false reports that forests have regrown when they are hardly (if at all) replanted. We are so close to having cut ALL forests that we will soon need to get by on only regrowth anyway. Let’s preserve the few remaining natural areas while we can. (Individual, San Diego, CA - #4190.10110)

Public Concern: The Forest Service should not mislead the public about which roads and trails would be closed as a result of this rule.

Based on what I have learned from local land managers (e.g....Carson City Forest Office) your statement in your May 2000 correspondence entitled “Roadless - What’s it about” is MISLEADING. Therein you write “No roads or trails will be closed.” It is my understanding that [the] Forest Service has wide discretion in recognizing a road or trail as such. Perhaps no “recognized” road or trail may be closed. However, I believe that many roads or trails will be closed because [the] Forest Service has not inventoried them as roads. You deem a plain and obvious road or trail, as not existing. (Individual, Carson City, NV - #703.32000)

Public Concern: The Forest Service should not mislead the public about the effects of the proposed rule by ignoring RARE II information about mineral potential.

The 1982 GAO report made this significant recommendation to Congress that is appropriate to today's situation: "In light of the high percentage of RARE II areas with unknown mineral potential (up to 85 percent) which the Forest Service recommended for wilderness in five Western States we reviewed, we believe that your Committee--since potential mineral conflicts are important in the wilderness decision making process--should hold off any decision until the Department of Agriculture provides you with corrected data showing the true extent of its mineral knowledge of possible wilderness areas under its jurisdiction." [Page 11.] In today's case, the Forest Service has ignored almost the entire knowledge base of mineral potential developed during and since the RARE II effort. It has done this, in my view, to mislead the American public and the Congress about the true effects of the proposal, and because the current Administration is not concerned about the economic effects on the minerals industry and the American people as a result of implementation of the proposal. (Individual, Purcellville, VA - #15876.42000)

Public Concern: The Forest Service should not mislead the public by including alternatives that would sanction uneconomical and inefficient commercial timber harvest.

Your alternatives address the continuation of timber harvest in roadless areas. Your preference for continuing harvest, albeit without roads, is puzzling, particularly in light of your stating that roads are by and large essential to harvest operations. You permit further commercial timbering, yet make it essentially uneconomic. Or if lumber prices take a turn upward, you leave the door open to the less efficient if less damaging removal by hi-lead or helicopter. This seems a little devious, don't you think? (Individual, Camp Sherman, OR - #61000.93300)

Public Concern: The Forest Service should disclose whether the real goal of this proposed rule is to save ecosystems or to appease environmentalists while continuing to allow destructive activities.

The prohibition of roadways in our national forests won't solve any problems or save any forests. Loggers will still be able to log by means of cable technology, helicopters and other new techniques which you can guarantee will be developed as a direct result of this law. Without any specific protection against logging the loggers will reach our untouched timber and go away unpunished. Was the goal of this law to save what few existing ecosystems we have left or was it to pass a weak law to temporarily appease environmentalists but at the same time allow the destruction to continue on the very thing that makes our nation successful? (Individual, No Address - #2329.43000)

Public Concern: The Forest Service should disclose whether the real goal of this proposed rule is simply an attempt to extort additional road maintenance money from Congress.

This appears to be a not so subtle attempt to extort additional road maintenance money from Congress. Consciously engaging in high stakes poker and playing the "no road building" card limits your management capability and jeopardizes the health and public enjoyment of 54 million acres of roadless NFS lands. This is not professional resource management based on science. Rather, it is resource management based on political blackmail. (Individual, Boise, ID - #1044.41000)

As a taxpayer, I oppose spending more money to maintain logging roads for timber companies. This is PUBLIC land, not private company land. (Individual, Great Falls, MT - #6046.41720)

Public Concern: The Forest Service should disclose whether the real goal of this proposed rule is to ensure the closure of roads by eliminating records and changing definitions.

I believe that many of these supposed “roadless areas” actually have roads, but these roads have been conveniently eliminated from your inventory list so you can permanently close these areas. I have been on hundreds of roads in National Forests that do not appear on Forest Service maps. (Individual, No Address - #10857.82000)

What is directly said isn't bad, but I have concerns about the strict definitions listed in your Glossary and how they could be interpreted in the future. Our fear is that someone, using your exact definition for a “Classified Road” would force broad closures of any roads not “classified.” The vast majority of roads in Nevada would fall into that category. (Individual, Ely, NV - #10563.32100)

As an outdoorsman and long time Idaho resident, I am deeply troubled by the Forest Service's proposed set of rules regulating roadless areas. These proposed rules redefine many existing recreational roads and trails as “unclassified” roads. This means that such areas can be designated as roadless, and that many public campgrounds and other recreational related facilities accessible by these unclassified roads will suddenly become roadless areas. (Individual, Boise, ID - #6948.32100)

The part of the plan that also defines a road and the maintenance allowed on these existing roads (or non-roads) also concerns me. Many current recreational opportunities in the State rely on these access trails (or roads) to be utilized. When these fall out of maintenance, I can only assume that the supported trails will also be closed. (Individual, Kent, WA - #6329.32100)

By looking at your map on roadless areas on the national forest some of the areas do have roads already there. They were put in, many years ago...So now they are two track roads what you call unclassified roads. I'm afraid you are going to close these types of roads, because you say they [are] not there by the map. (Individual, Dillon, MT - #7378.32100)

Public Concern: The Forest Service should disclose whether the real goal of this proposed rule is to bypass Congress and establish de facto wilderness areas.

The executive order handed down by Commander in Chief Clinton to USFS creates a DEFACTO wilderness. This is something only Congress is empowered to do under current law. The “Roadless Area Conservation Proposed Rule” should not be considered without congressional approval. (Individual, Carson City, NV - #669.41000)

This is the most blatant attempt by the Administration to circumvent congress and establish de facto wilderness totally without congressional approval. (Individual, Glide, OR - #749.41000)

Section 24 of the Forest Reserve Act of 1891 was illegally adopted by a House-Senate Conference Committee. Therefore the USFS LACKS CONSTITUTIONAL JURISDICTION over these lands. USDA lacks jurisdiction for this decision because the effect of the policy is to convert the use of the land from “multiple use” to a single use: wilderness. The USDA FS has the agency mission of managing our NFS, not changing their use. This is a violation of statute and is unconstitutional exercise of Administrative Law. Congress is the only lawmaking body with the authority to declare public lands “wilderness.”

Alternatives B, C, and D effectively imply de facto wilderness classification. Such classification is a legislative prerogative with Executive concurrence and should not usurp Congressional powers. Wilderness classification should be considered on a case by case basis. Not by blanket designation. (Individual, Pueblo, CO - #2884.41000)

I believe that the true purpose of this proposal is to create mini wilderness areas. If this proposal represented the true feelings of a majority of citizens, it would not be necessary to achieve your goal with slight of hand and deception. (Individual, Sumpter, OR - #2735.43000)

The proposed rule is overly broad, does not allow for public inputs on a case-by-case basis, and amounts to a declaration of wilderness areas without Congressional Approval. (Recreation organization, Whitehall, MT - #4658.41000)

On the surface it would seem appealing to some people to not have “roads” running through forests. But, by defining any path wider than 50” a “road” and then saying that none can be built or even maintained, a clearer agenda seems to emerge. In order for lands to be designated “Wilderness” (the most restrictive designation public land can receive in regard to access by humans that choose to use anything other than their feet to do so) the land in question cannot, by law, have roads. By not constructing any path wider than 50” on any Forest land and not even allowing maintenance of existing paths wider than 50” (a.k.a. “roads”), it would appear that the long term goal of the Forest Service (and of the outgoing Clinton administration, along with Candidate Gore) is for a vast increase in the amount of future designated Wilderness Areas. (Individual, Prospect, KY - #6286.43000)

Public Concern: The Forest Service should disclose whether the real goal of this and recent rulemakings is to lock out the public from public lands.

The Roadless Rule is only one part of a three part rulemaking process designed to lock the public out of the public land. (Individual, Lake Havasu City, AZ - #2752.42000)

I...believe that this is just the first step by the “elite” to deny all access to the forests. They are doing this movement in phases. Phase One: No more road building. Phase Two: Redefine what a road is, thereby only “maintaining” roads which are approved for travel. Phase Three: After several years the unapproved roads will disappear (by closure and without maintenance), and presto! You now have a wilderness area where there wasn’t one before. Now the elite have their very own campground to themselves. (Individual, Las Vegas, NV - #3223.43000)

How can you honestly believe that the public cannot see that your proposed rule is not a stand alone document? That it is, in fact, simply a part of the Clinton/Gore agenda designed to keep the public off of the land that belongs to us? (Recreational Organization, ID - #3292.43000)

I will start by saying I would have no problem with putting these now unroaded lands into “roadless” designation if it would stop there, but we all know it won't. I can see more and more money pumped into decommissioning of existing roads that will then become “roadless” areas to be included into this “land grab” for the extreme environmentalists/wilderness activists. (Individual, Libby, MT - #10758.43000)

A careful reading of the SDEIS for the ICBEMP...leads me to believe that you plan to eliminate people from rural areas here in the West. If your roadless plan is an extension of that fallacious policy I want to know about that. (Individual, Albany, OR - #5675.43000)

Public Concern: The Forest Service should disclose whether the proposed rule is intended to help the Forest Service comply with commitments made to the International Union for the Conservation of Nature and Natural Resources.

The proposed rule and the companion actions are a small portion of the agency's endeavor to meet its international commitments to implement and enforce several Treaties and international agreements, including but not limited to, the Convention on Trade In Endangered Species (CITES), the Convention on Biological Diversity (CBD), and its implementing plan “Agenda 21.” (USDA-Forest Service Long Term Strategic Plan) The agency is covertly implementing the international agreements, plans, programs and projects in order to achieve the United Nations policies and definitions of “sustainable development.” These commitments and efforts in resource manipulation and social engineering are not disclosed in the intent of agency personnel and its international partners to override the powers vested in the duly elected Congress and the powers specifically reserved to the several States and to the people. The International Union For The Conservation Of Nature And Natural Resources (IUNC), a foreign

international organization, drafted both the Convention on Biological Diversity and Agenda 21 at the direction of the United Nations Environmental Program (UNEP), and further, is directly involved in the listings of threatened and endangered species (Red Book). USDA-Forest Service is a member in the IUCN and is listed as IUCN member "GA/375." The IUCN has its own Statutes and Regulations; it has its own sovereign Congress, and passes its own Resolutions and Recommendations, which in turn are implemented by the member agencies and non-governmental organizations (NGOs). As a member in this foreign international organization, and having jointly entered into other partnership contracts and several Memorandum of Understandings (MOUs) with other international organizations, the USDA - Forest Service has overriding obligations which are not disclosed in the stated purposes for the proposed rule, and are not accounted for in the Draft EIS. The systematic scheme, among other things, is known to: (1) cause forced displacement of populations. (Brady Plan); (2) be monopsonistic; (3) create monopoly enterprises; (4) cause significant social, economic, and political harm; and (5) cause the cultural extinction of indigenous people and the loss of specific knowledge. This continued nondisclosure and intentional deception by the agency violates the duly ordained and established Constitution, the principles of the Law of Nations, creates an aristocracy and de facto government, violates the Federal Advisory Committees Act, violates the Code of Ethics for Government Service, and several other provisions of existing domestic law. Although none of the Alternatives will cure this substantive defect and the adverse impacts of the undisclosed systematic international scheme, Alternative I leaves the property and resources under the concurrent jurisdiction of domestic authority. The agency's international commitments, implementing actions, and proposed rules have been and are objected to. (Individual, Lakemont, GA - #14179.50000)

2.3.2. Use of Best Science and Assumptions

Many respondents question the balance, objectivity, and accuracy of the science used in both the Draft EIS and the proposed rule. This section reveals accusations of bias, inconsistencies, lack of peer review, and non-cooperation with adjacent landowners, other land management agencies, and scientists. Many respondents are concerned that the Forest Service is not using balanced and objective data and language to clearly and fairly represent the issues. Remarks one individual, "It is apparent that the impact statement has not been prepared in a balanced or impartial environment and that its conclusions are suspect." Charges another, "Scientific data was gathered from the Committee of Scientists, known to be a biased group, without peer review, and to the exclusion of other members of the scientific community."

One point made repeatedly by opponents of the proposed rule is that the Draft EIS contains insulting and discriminatory language, and in so doing reveals a deep social bias against certain groups, particularly forestry workers. Most often reference is made to the social analysis of forestry workers on page 3-190. Respondents express unequivocal outrage over this passage and demand that, at the very least, a public apology be offered and a full retraction made.

Respondents urge the Forest Service to remove the bias created by its use of questionable references and assert that a new analysis of rural economics should be initiated. Some suggest the agency modify language contained in the draft that could be used to discount recreational values. Indeed, some suggest, pursuant to 40CFR 1502.9 and 1502.9(a) respectively, that the agency issue a supplement "to address...significant new circumstances and information" and "to address the inadequacies that preclude meaningful analysis."

A number of respondents, including elected officials, claim there are contradictions within the Draft EIS; others claim there are discrepancies between the Draft summary and parent document. In addition to concerns over consistency, many concerns are expressed over the overall quality of analysis. Many remark that much of the analysis rests on broad, unsubstantiated assumptions,

and argue that the agency must support its claims with references. Quite a few respondents feel the use of qualitative discussions and estimates should be replaced with scientific data. Some individuals point out, for example, that there is no scientific reason to extend the proposed rule to the Tongass. (As it is noted elsewhere in this summary, however, other respondents argue there is no scientific reason for excluding the Tongass). Many call into question the scientific methods used throughout this process--some noting that the agency should incorporate data and findings provided by the public into its analysis, others pointing out the need for technical expertise during local implementation.

Public Concern: The Forest Service should use balanced and objective data and language to clearly and fairly represent the issues.

It is apparent that the impact statement has not been prepared in a balanced or impartial environment and that its conclusions are suspect. (Individual, Boise, ID - #8101.42000)

Scientific data was gathered from the Committee of Scientists, known to be a biased group, without peer review, and to the exclusion of other members of the scientific community. (Individual, No Address - #9953.42000)

Establish a scientific advisory committee specializing in conservation biology. A balance in the representation of interests is necessary to ensure that self-interest is kept in check and in perspective. (Individual, Pelican, AK - #7179.63000)

I am deeply disturbed that this roadless area protection initiative was developed in a vacuum, with virtually all input coming from a select few in the environmental preservationist community...Representatives from these groups had continuous communication with and access to the federal employees directly involved in the creation of the DEIS and rulemaking, including providing the government with draft language, legal memoranda, and survey research data used to justify and frame the roadless area rule. There was not even a token effort by the Administration to involve other interested parties, and the narrow range of alternatives show the predetermined outcome. (Individual, French Creek, WV - #8597.41710)

The language throughout the draft environmental impact statement (Volumes I and II) clearly accents all the negative "ifs" that might happen with road construction/reconstruction and timber management. The point of this EIS was not to provide equitable discussion on the issue, but provide enough "ifs" so an individual would conclude that these roadless areas are necessary. Common language throughout the document indicates possibility--can, may, might and could, has the possibility. Example--Pages 3-26.

This language is unfortunate for such a document, but appropriate if one wishes to cloud the issues. (County Elected Official, Grand Marais, MN - #43757.42000)

The D.E.I.S. goes into detail about community resiliency in an attempt to justify the predetermined result. It makes absolutely no mention of studies by Robison and McKetta that reveal there is more than adequate available product to sustain existing mills and increase production while harvesting in a sustainable way. There are other unbiased publications that reveal major flaws in the current administrative attitude regarding responsible forest land management. Responsible forest managers would not leave the forest to burn, killing wildlife and fish, polluting the air and water and endangering families in the interface. (State Elected Officials or Staff, Orofino, ID - #51044.43000)

The tone of the Draft EIS is so blatantly biased toward the action alternatives it's embarrassing. With all the bad effects listed that would occur with further road building in roadless areas it's amazing that there is any clean air, clean water or wildlife etc. even found in the national forests. According to the Draft EIS roads are the culprit in poaching, reducing wildlife habitat, wrecking our water and polluting our air. (Individual, Pueblo CO - #6654.10000)

Finally, within the roadless rule itself, the Procedural Alternatives are supposed to be guidelines to be used by local forest managers when creating or revising a forest management plan to determine if the “roadless character” should be preserved in additional areas. However, given that the long-term intent of the National Forest Service is to significantly restrict multiple use activities in National Forests, there is concern that local forest staff will be directed to use local forest management plans as a vehicle to further that end. It is stated within the impact statement itself, that “it is reasonable to assume that the proposed procedural requirements would reinforce the effects achieved by the proposed requirements to prohibit road construction and reconstruction and that the procedural requirements would apply to a greater area than inventoried roadless areas...” (Municipal Association, Monona, WI - #19664.10210)

Public Concern: The Forest Service should remove insulting and discriminatory language and eliminate the social bias.

There are many statements in the document that appear insulting and discriminatory to various classes of people. They include logging and timber related professions, motorized users, and former and retired Forest Service employees. One example is that found on Page 3-169 stating that “Should people lose the opportunity to engage in motorized recreation, the potential negative effects would include the inability of children to experience nature; increased likelihood that youth will get into trouble because of fewer worthwhile diversions; deterioration of mental health; undermining of economic livelihoods and culture; loss of family traditions and opportunities to experience family togetherness; and lost opportunities for future generations.” This makes it sound as though people who engage in motorcycle, snowmobile, off-highway, or any other motorized recreational pastime are mentally and socially unstable as compared to those who prefer to rough it on foot. (County Elected Official, Sheridan, WY - #16187.42100)

Finally, many inferences are made to past management of the national forests--that roadless areas were considered as “banks” for further development, past management has created many problems, and resources were exploited. Former and retired Forest Service employees had, and have, a commitment to management based on the best information and social demands at the time of their watch. To imply that past management decisions by these people had destructive intentions is an overreaching conclusion. The question that begs answering is “What does the Forest Service think of other classes of people, such as ranchers, outfitters, business people, and community leaders?” (County Elected Official, Sheridan, WY - #16187.42100)

In Chapter 3 of the document (Roadless Area conservation Internal Briefing Draft 4/21/00), pages 3-189 and 190 some government goose stepper explains what the government thinks of people who work in the Forest Products Industry. I am sickened by this document. If I were rich I would demand a written apology, but as the government writes: “I live among the least prosperous communities” and I “entered this industry because it provides high wages without a high level of education” and it’s my “route to a middle class lifestyle” but if an equivalent job was available I would be happy to take advantage of it. (Individual, Marquette, MI - #898.33300)

I have received a copy of the draft environmental impact statement (DEIS) regarding the President’s roadless area directive. I was very shocked and angry upon discovering your statements concerning loggers and sawmill workers. I find these statements outrageous and laced with bigotry and discrimination (Page 3-190 DEIS). It is very apparent by the statements made by you and the administration, that there is little tolerance for the people of the wood products industry. However, we are shocked that you would stoop to the level you have in the DEIS to degrade us to the rest of the public. (Individual, John Day, OR - #1689.93200)

As a retired soil scientist and Area Conservationist with the USDA and the SCS who on occasion worked with the U.S. Forest Service people, I find the wording totally inappropriate which probably demonstrates the current administration is insensitive and ignorant of the needs and hopes of the people who live and work in the areas around the National Forest lands. (Individual, Thief River Falls, MN - #7501.31000)

The thrust of page 3-190 tries to convince forestry workers, their families, and policymakers that timber related professions should be abandoned because of their inherent risk and lack of job security. It implies that given these conditions, everyone affected by the roadless initiative should naturally agree with Forest Service objectives.

When the Forest Service misinterprets the composition, goals, and concerns of people in the timber industry, it mars the entire development of the roadless initiative. Forestry workers will be greatly impacted by the roadless initiative and it is necessary to understand who holds these positions and how they regard their work. (Federal Elected Official, Marquette, MI - #2814.42100)

In reading portions of the Draft Environmental Impact Statement, specifically some comments made on page 3-190, paragraph 3, I find them personally offensive and am very dismayed that an agency of my own government would slander people from rural timber dependent communities in such a callous, condescending manner.

ISSUE A PUBLIC APOLOGY

These condescending and ignorant statements are disrespectful. I demand that this text be struck from the final EIS and that a public apology be issued to the forestry workers of this country. Specifically, the 'Social Effects Related to Timber Harvest' section (page 3-190) displays a patronizing attitude toward forestry workers and the communities where they reside. It states that "if Forest Service timber management policies are consistent and reliable" then forestry workers and their communities would "adjust." It is grossly arrogant to imply that forestry workers would prefer any "reliable" Forest Service policies over their job security. These workers depend on timber harvesting for their economic stability and to remove such jobs would only exacerbate the conditions that plague some of their communities.

The Forest Service carelessly dabbles in "pop" psychology by characterizing forestry workers as uneducated, unstable, and unmotivated. It states that "many people enter the wood products industry because it provides opportunities to earn high wages without having a high level of education." Such a poorly referenced statement is particularly offensive. Many forestry workers may have college degrees but are natives of the area who prefer to live and raise their families in their hometowns while working in a profession shared by their parents. If it is true, as described in the text, that "timber dependent communities are among the least prosperous," can the residents of that area be faulted for turning to forestry jobs that pay "high wages?"

What is being done is to falsely characterize the timber industry to the public so as to enable the USFS to implement their proposed roadless area initiative. It is bad enough to have to battle with the environmental groups that want to halt timber harvests from public lands, and now we have the USFS promoting derogatory views of the forest products industry and the people and communities surrounding them. If there wasn't a forest product industry there would not be a USFS.

I believe we in the forest products industry deserve an apology and a retraction of the offending statements. Also, an answer is in order as to how and why such a rotten characterization of our people in rural timber dependent communities was allowed to be printed by the USFS for public consumption. (Individual, Pelikie, MI - #6511.33300)

I am totally dismayed by the characterization of woods workers and the forest industry. I am personally offended that this agency has not identified to the public the authors and reviewers of these statements. Public apology is not adequate in this case. (Individual, No Address - #8442.44450)

Public Concern: The Forest Service should remove the bias created by using questionable references and should conduct new rural economics investigations.

It is appalling that you would use the economic conclusions of Tom Power in your draft environmental impact statement. Mr. Power says that while the national timber program has plummeted, Montana has gained significant economic vitality. What planet is he on? (Individual, Missoula, MT - #10467.93100)

Chapter 3--Affected Environment and Environmental Consequences, page 3-190, attributes several "facts" about timber dependent communities and forest products workers to an inappropriate source (Power 1996). This book is not a primary source on the sociology of rural communities, it is not a peer-reviewed article from a professional journal, nor is it an unbiased review of case studies on rural economics. In fact, Power (1996) is an extremely biased book critical of the forest products industry. The Amazon.com book review for Power (1996) contains the sentence: "A professor at the University of Montana, his is the perfect perch from which to regard the rapacious

plunder of local and state economies by the mining and timber companies.” Hardly an unbiased source appropriate for reference in an environmental impact statement.

Because Power (1996) is biased, unscientific, and contains factually inaccurate information, I urge you to strike all references to it from the Draft EIS. Furthermore, I suggest that in the future the Forest Service use its time to carefully investigate the facts regarding rural economics rather than utilizing dubious sources that satisfy their a priori assumptions about the forest products industry and timber dependent communities. (Individual, Bend, OR - #735.44450)

Public Concern: The Forest Service should modify language contained in the Draft EIS that could be used to discount recreational values.

I am concerned that some of the language in the roadless DEIS could be interpreted by individual land managers and environmental special interest groups in a way that negatively impacts recreational values. (Individual, Littleton, CO - #134.42100)

Public Concern: The Forest Service should issue a supplement to the Draft EIS pursuant to 40 CFR 1502.9, “to address the significant new circumstances and information” and 40 CFR 1502.9(a) “to address the inadequacies that preclude meaningful analysis.”

The Elko County Public Land Use Advisory Commission would like to go on record in requesting the Forest Service, either, Supplement this Draft EIS, as per CEQ Regulation 40 CFR 1502.9(c)(ii), to address the significant new circumstances and information that is relevant to our environmental concerns and bearing on the proposed action and its impacts. Revised the Draft EIS, as per CEQ Regulation 40 CFR 1502.9(a), to address inadequacies that preclude meaningful analysis. (County Agency, Elko, NV - #17274.7000)

The roadless area protection DEIS and proposed rulemaking are deficient, both legally and factually, and flawed beyond repair. The Forest Service must prepare a supplement draft environmental impact statement (SDEIS) or withdraw the proposal. Additional information on individual roadless areas must be provided, the true ecological, economic and social impacts must be described, additional alternatives must be analyzed, and the cumulative impacts of the other major rulemakings presented. (Forest Products Company, Eugene, OR - #43862.70000)

Public Concern: The Forest Service should address contradictions within the Draft EIS.

The document is peppered with contradictory statements from one section to another.

“...roadless and other unroaded areas...are still the reservoir for future designated wilderness areas.” However, page 2-17 concludes that the alternative of “Recommend All Inventoried Roadless Areas for Wilderness Designation” was eliminated from further consideration because “Most of the inventoried roadless areas in question have already been evaluated for wilderness in the land management planning process and it was determined for various factors that those areas should not be designated as wilderness.” (County Elected Official, Sheridan, WY - #16187.31300)

Page 3-242, paragraph 5, “If implemented, the proposed prohibition (Alternative 2) would maintain long term productivity by reducing loss caused by road construction to watersheds, soils, critical habitat, and dispersed recreation activities in inventoried roadless areas when compared to the no action alternative (alternative 1, A, T1). The alternative prohibitions (Alternatives 3 and 4) would further maintain the long term productivity of these resources by reducing effects caused by timber harvesting. Page 3-245, paragraph 2 “If implemented, the proposed prohibition on road construction would reduce road caused irreversible and irretrievable commitments to watersheds, soils, critical habitat, and dispersed recreation activities in inventoried roadless areas on NFS lands compared to potential roading effects under the No Action Alternative.

These statements are contrary to the statements on page 3-43, paragraph 2-4, which state that Alternative 3 would increase the long term risks associated with large and damaging fires. On page 3-43, paragraph 3 states that Alternative 4 would lead to an increased incidence of large, damaging wildfires, and their related effect on soil, water, and air resources and threats to human safety and property. Paragraph 4 states that this alternative (4) poses additional considerable effects over Alternative 2 and 3. Primarily, the effects would be increased long term damage of soil, water, and air resources on site and downstream. The increased likelihood of harm to human safety and property in the expanding wildland urban interface are of particular concern. The draft EIS offers conflicting testimony about the effects of roads, the increased likelihood of large fires and the likelihood of harm to human safety and property (State Elected Official, Salt Lake City, UT - #43918.72300)

Public Concern: The Forest Service should address discrepancies between the summary and the Draft EIS regarding local authority prior to plan revisions.

Page S-9 and Page 2-7 and 2-8--The descriptions of "Alternative B--Proposed Action and Preferred Alternative" between the Summary and Draft EIS are different. Since a majority of the public and local governments read the Summary, the description of alternatives is misleading. The Summary makes it appear that the Forest Service will allow road construction and reconstruction until Forest Plan revisions are undertaken with a full range of options, including the use of roads. The DEIS closes the door for local officials to consider roads as a management option by adding the sentence "...local responsible officials could not authorize the construction or reconstruction of roads..." Relief: The Forest Service must clarify the Summary to be consistent with the parent document. In addition, the Forest Service must determine, identify, and address the numerous comments received from individuals, groups, and local governments that read only the Summary and interpret it as leaving a full range of options open in the future. (County Elected Officials, Worland, WY - #16185.31200)

The summary does not present a true recap of the information contained in Volume 1 of the Draft EIS. Items of utmost importance are in the summary that do not coincide with the full document. For example: the Summary omits the importance of the local managers having power to decide on the future disposition of roadless areas. (County Elected Official, Goldfield, NV - #16085.41240)

Part 1502.12 Summary. Each environmental impact statement shall contain a summary which adequately and accurately summarizes the statement. FOREST SERVICE DRAFT EIS--The document provides a summary that does not accurately summarize the Draft EIS. In fact, the description of alternatives and comparison of alternatives in the summary omits critical information that could lead to a misinterpretation of what the agency is proposing. For example, the summary describes the procedural proposed action as an option for local decision-makers on whether and how to protect roadless characteristics. The Draft EIS adds a sentence stating that local decision-makers could not authorize road construction or reconstruction. The summary gives broad discretion and the Draft EIS takes it away. This is not an accurate reflection of what the Draft EIS proposed action represents. Finally, the comparison of alternatives table in the summary omits many of the factors evaluated in the Draft EIS, which appears to support the proposed action. (County Elected Official, Sheridan, WY - #16187.33700)

Public Concern: The Forest Service should reassess the broad, unsubstantiated assumptions used in the Draft EIS.

Your assumption is that if there is no road then it has natural conditions and is pristine wildlife and fish habitat even after an area has been burnt over with catastrophic fires. (Individual, McCall, ID - #7575.83000)

The DEIS is replete with INCORRECT AND UNSUBSTANTIATED ASSUMPTIONS AND INCOMPLETE AND OUT-OF-DATE INFORMATION. (Timber Industry or Association, Eugene, OR - #15879.7000)

I am in favor of Alternative #1, No Action; No Prohibitions for the following reasons: The EIS makes assumptions that are too broad & not sufficiently documented to be valid. (Individual, Pueblo West, CO - #13674.70000)

I found the analysis to be wrought with vagaries, subjective statements and opinions that are presented as facts. (Individual, Boise, ID - #8101.7000)

The Forest Service's cumulative impacts analysis in the DEIS is severely flawed. The Forest Service devotes LESS THAN THREE PAGES to what it titles "Cumulative Effects of the Proposed Rule with Other Forest Service Proposed Rules," see DEIS at 3-240 - 3-242, with only a smattering of acknowledgement in other portions of the DEIS of existing and proposed environmental laws and regulations that already protect the environment and the Forest System and minimize the ecological impact of productive uses such as mining. Other land use limitations, in Forest Plans or otherwise, or special use dedications are entirely ignored. This is hardly an adequate discussion. (Business, Washington, DC - #52224.72100)

Public Concern: The Forest Service should cite references to support statements made in the Draft EIS.

The document is full of unsupported statements that mislead the reader into concluding that road construction, reconstruction, and timber harvest are destructive to the national forests. Examples extracted from the document include:

- A. "Roadless areas are better able to respond to natural disturbances" (not supported).
- B. "All three proposed rules seek to provide for long-term environmental sustainability, ensure collaboration with the public..." (collaboration was not used for this proposed rule).
- C. "More than half of the timber harvest volume is expected to be from clearcutting...clearcutting is an important cause of biodiversity loss." This is misleading and contrary to other statements, such as, "Nationally, clearcutting has decreased from 31% of total harvest acres in 1989 to only 10% in 1997."
- D. "Unroaded areas are viewed as banks for future resource development" (not supported).
- E. "Roadless and other unroaded areas...are still the reservoir for future designated wilderness areas" (not supported).
- F. The section addressing cumulative effects states that roadless areas will be managed "... in perpetuity unroaded." (Only Congress has the authority to decide on such an action). (County Elected Official, Sheridan, WY - #16187.42100)

The quality of this DEIS reflects the rush in which it was produced. It lacks specific studies designed to provide useful information to support it. It misuses, misunderstands, and misuses other information, resulting in the inaccurate and insulting references to woods workers and logging communities found in Chapter 3. This is not the kind of work we expect from the Forest Service. There is no hurry to get this thing done! If you insist on doing it, do it right. Individual, Colorado Springs, CO - #59459.44410)

Public Concern: The Forest Service should replace the use of qualitative discussions and estimates with scientific data.

Everything in the DEIS appears to be a sentimental guess. "Qualitative discussion" and "estimates" don't cut it. (Individual, Bozeman, MT - #12496.82000)

I fail to see how a programmatic EIS can be site specific. Your analysis contains many generalities and sound bites, but yet you call it science based. (Individual, McCall, ID - #7575.83000)

Strong evidence suggests the information used to the development of the plan was erroneous at best further eroding its viability. (Preservation/Conservation Organization, No Address - #8412.70000)

NO SCIENTIFIC DATA SUPPORTS THE ROADLESS PLAN IN THE TONGASS

There is no scientific data to backup the roadless plan in the Tongass. (Individual, Ketchikan, AK - #5665.70000)

Public Concern: The Forest Service should use scientific methods and analyses in reviewing this proposed rule.

As most of the decisions made in the past 8 years, the government agencies doing research and studies of proposals have used unscientific or nonexistent methods. I do not trust any research or studies done by the Forest Service produced in the past 8 years. (Individual, No Address - #1609.82000)

Integrating SCIENCE into this process, whose science? (Individual, Sovey, MI - #670.70000)

I oppose: The junk science is being used to support why this is necessary. (Individual, Pembroke Pines, FL - #3422.70000)

Public Concern: The Forest Service should incorporate the data and findings provided by the public into its analyses.

The Forest Service should be paying the public for doing its work, since this kind of work is not prioritized and therefore never gets done. (How long has it taken for the FS to do this inventory? And it's still not complete.) The citizens have had to do it in order to save what is left of healthy habitat. We continually present to you our work and findings so that you will hopefully at least incorporate the data and actually do something with it. Most of the time, the biology and scientific staff is impressed, while the administrators again give it lip service. (Individual, Tucson, AZ - #10802.93622)

Public Concern: The Forest Service should address the need for technical expertise during local implementation.

Who will review the purpose/need for roads that fall under exceptions 294.12 b (1,2,3 and 4)? This will be an avenue for abuse unless reviewed by regional officers, etc. Sections 294.13 a (1,3,4,6 and 9) are closely related and perhaps will be the most important evaluation criteria considering the purpose/need of this proposal. A-28 Section 294.13 b (2) "sufficient size, shape, and position"--will responsible officials be properly informed as to what constitutes these things? Consultation with staff experts in GIS and biological disciplines will be crucial here. (Individual, Leavenworth, WA - #15897.41000)

2.4. Public Involvement Processes

Comment submitted on public involvement ranges from some accolades to a great deal of criticism on all aspects of the process. On the whole, respondents feel the process was not open or available to a wide range of participants and that this was done purposefully to keep certain constituents out. Some people, however, believe the Forest Service went to great lengths to include as many members of the public as possible.

One issue raised by more than one respondent is the availability of local line officers, who, they assert, "should be accessible to the public for comment and public review before decisions are made and implemented." Others express dismay that they did not receive information they requested in either a timely manner or at all, and ask the Forest Service to respond to this problem. These respondents wonder how they are supposed to comment on documents they seem unable to obtain.

Public comments are separated into the following subsections: Subsection 2.4.1 Public Meetings; Subsection 2.4.2 Comment Period; Subsection 2.4.3 Public Input; and Subsection 2.4.4 Analysis of Public Comment.

Public Concern: The proposed rule should call for continued public processes and information sharing.

The proposed rule was developed without balanced public input. Not all parties were invited to participate in the process. (Business Association, Barre, VT - #9260.44400)

The inventory for our area (the Alpine County portion of the Humboldt-Toiyabe NF) was done in secret with no participation by any county officials, no local notification, and no local public participation so far as we have been able to determine. (Individual, Markleeville, CA - #13284.42000)

I look forward to continued involvement in this public process for better forest health and ecosystem management in light of the most important roadless area values and characteristics as delimited and emphasized in this letter and your booklet "Roadless Area Conservation." (Individual, Corvallis, OR - #5157.44000)

I appreciate how much effort the Forest Service put forth in helping me understand this complex and important issue. (Individual, Sedro Woolley, WA - #7644.44100)

I do appreciate your open process and your extraordinary effort to solicit and consider public comment. (Individual, Half Moon Bay, CA - #8387.44400)

LOCAL MANAGERS SHOULD BE ACCESSIBLE

The designated local manager should be accessible to the public for comment and public review before decisions are made and implemented. (Individual, Corvallis, MT - #9400.44000)

INFORMATION SHOULD BE DISSEMINATED

Late last year I sent...Chequamegon-Nicolet National Forest a letter seeking info about this proposed Roadless Area rule. Dec. 27, 1999 I sent a similar letter to...USDA Forest Service. Feb. 29-00 I sent letters to [my representatives in Washington] seeking info about the proposed Roadless Area rule. I never received any kind of response from any of these people. This made me feel betrayed and suspicious. (Individual, Pulaski, WI - #2842.42000)

Freedom of Information Act requests to the District, Forest, Region and the Washington Office and to our Congressman's office for information on the inventory participants and process have been completely stonewalled. A member of Sierra Club stated in a public meeting that Sierra Club had paid to have the inventory done. (Individual, Markleeville, CA - #13284.42000)

I requested a Roadless DEIS (both a hard and electronic copy) and I still have not received it. How is the public supposed to be able to effectively review the DEIS if we have not received it? (Individual, Sacramento, CA - #2834.44220)

Many members of our organization have requested copies of the documents and have not received them to date. Their opportunity to respond will not be 60 days. This appears to be questionable legally. (Environmental/Preservation Organization, Harte, CA - #92.44460)

We are now nearly one-third the way through the comment period with public meetings underway and I have not received a copy of the EIS and Rule that I requested nearly four weeks ago. As an Association who represents small forest product companies who purchased nearly 70% (as a class of purchasers) of all federal timber sold last year it is unconscionable that the Agency cannot seem to fulfill our request for copies of the EIS. I will be contacting our

congressional delegations, and am considering going to court to delay the listening sessions unless we receive our requested material within the next week....We have requested copies of these documents electronically, through fax, and letter, and through post card. What do we have to do to get copies? (Timber Company or Association, Beaverton, OR - #95.44460)

2.4.1 Public Meetings

Respondents express a wide array of concerns relative to public meetings. Many believe inadequate notice was given, some further suggesting that an advance notice of agenda and format might encourage greater attendance. By far most who comment on this topic, however, believe the Forest Service should set an adequate number of public meetings at convenient times and locations. Some respondents, notably from the East and from southern coastlines, believe the locations needed to be much more centrally located and feel discriminated against because they do not live adjacent to a forest boundary. This complaint is equally true of urbanites in general, who enjoy the recreational opportunities provided by the national forests and believe better options should have been given for them to attend. While locations are of particular interest to many, some also comment on dates chosen, scheduling conflicts with other community events, and time of day. These respondents, on the whole, do not feel the Forest Service was sensitive to the needs of the community or to people traveling long distances.

Respondents express concern as well that the Forest Service should ensure that meetings are conducted fairly. For some, this means making sure room size is adequate. These respondents do not believe the agency planned or anticipated well when picking places to hold its meetings. This was a particular problem in the western states where attendance was at an unprecedented high, as in Missoula, Montana, where people had to be turned away for lack of space. For others, ensuring fairness means making sure someone is there to record the comments.

A number of individuals express concern that the PowerPoint presentation was biased, misleading, and inaccurate. In this regard many respondents feel the Forest Service needs to make greater effort to make its presentations in public meetings clearer and more accurate. This could be done by providing relevant materials and perhaps photographs of areas in question. At least one individual is so concerned over the adequacy of the public meetings that "Senate hearings [should be held] on the U.S. Forest Service's handling [of them]." Another individual writes in protest of not being allowed to carry a sign into the meeting hall; while yet another complains of the inappropriateness of allowing environmental groups to set up booths and sell merchandise.

Public Concern: The Forest Service should give adequate notice of public meetings.

[Let] the record show that this opposition is based on: Inadequate public notice (two days) concerning public hearings held by the Forest Service concerning this proposal. (County Elected Official, Spooner, WI - # 2358.44130)

GIVE ADVANCE NOTICE OF FORMAT AND AGENDA

Thank you for holding this information session. You may get better attendance if the public was told in the meeting announcement that the presentation is set up to “walk through” or as an exhibit. When I thought it was to be a 2.5 hour “meeting” I was kind of dreading it. It was very well presented, helpful, and very professionally done. (Individual, Pueblo West, CO - #610.44140)

Public Concern: The Forest Service should set an adequate number of public meetings at convenient times and locations.

180 meetings were not enough to make the public aware of the total plan. (Individual, Poncha Springs, CO - #8419.44100)

A scattered meeting schedule has made a farce out of the whole process. (Timber Association, Lewiston, ID - #13352.44100)

Why aren't you holding public hearings in all parts of the country? A person in Guam or New Mexico has just as much to say as a person in Idaho. These are National Forests. (Individual, Sagle, ID - #13703.44100)

These meetings should be held in the evening or on the weekend in order to facilitate the greatest attendance by those wishing to make their opinions known. To do otherwise begs the question whether or not the Forest Service genuinely values the opinions of those who were not afforded the “inside track” to creating policy at the national level. (Individual, Canon City, CO - #1103.44120)

This is not a public meeting on the Roadless Initiative and its effects on the Allegheny National Forest. The term public is defined as “the people constituting a community, state, or nation.” This is supposed to be a meeting to receive public testimony on the national Roadless Area Policy Initiative and its effect on the Allegheny National Forest.”

It should have been held in a central location like State College or Harrisburg on a Saturday when the working public could have attended or regional meetings should have been held in multiple locations.

[The supervisor’s] behavior is a continuing embarrassment to the public concerned about the protection of our National Forests. This so-called public meeting is a farce, and will produce management comments expected from timber dependent communities adjacent to the Allegheny National Forest. [The supervisor] has been told by letter and at other so-called public meetings to schedule meetings in centralized locations at accessible times. If he does not understand the word PUBLIC as it relates to our National Forests, he should resign. (Individual, Kane, PA - #7841.44100)

Why is New Jersey left out of hearings on roads in forests? I understand the US Forest Service recently scheduled within the last 45 days--300 hearings on roads in forests? Is New Jersey a stepchild? I saw no notice of any hearings on this matter in New Jersey. Are we left out? As citizens of the United States, it seems to me that [the] Forest Service routinely has a policy of excluding metropolitan areas from questions such as these and that is not right. (Individual, Florham Park, NJ - #19717.44000)

Since we have many, many millions of people who are paying taxes to support your Service and we like to have our views heard, when are you coming to Morristown, New Jersey to make a presentation like you are doing in Alexandria, VA.? (Individual, No Address - #6060.44110)

I find it peculiar that the only meeting in Illinois is held in Marion, approx. six hours driving from Chicago (the main population center), on a weekday, on the first day after a long weekend. This does not look like you are really interested in a large turnout. (Individual, Deerfield, IL - #782.44100)

On behalf of over 5,000 members of the Houston Sierra Club, I am requesting the Forest Service in Texas conduct public meetings on the weekends or evenings in Houston, Dallas-Fort Worth, Austin, and Beaumont...Currently, one informational meeting is planned for 06/06/2000, 6-8 pm, in Lufkin, Texas at the Federal Building and one comment meeting is planned for 06/27/2000 at the same place and time.

It is unreasonable to make a person in Houston, Texas drive 2.5 hours, 100 miles, to Lufkin, Texas during rush hour traffic to give public comments on roadless areas. (Environmental/Preservation Organization, Bellaire, TX - #1715.44100)

Apparently no public hearings on the policy for roadless areas are scheduled for my state of Massachusetts. (Individual, Brookline, MA - #167.44110)

It is...noted that in your public meetings, you have left out the San Francisco Bay Area. (Individual, Santa Clara, CA - #550.44110).

I'd like to know why there is no public involvement meeting being held in Oklahoma. Russellville, Arkansas is the closest place for Oklahomans to attend a meeting and it is five hours away! (Individual, Oklahoma City, OK - #2264.44110)

Surely meetings could be scheduled in Kansas City. Or would that mean too many folks might show up? (Individual, Kansas City, MO - #2375.44110)

I request that one of the meetings be held at the Mt. Hood Headquarters in Sandy, Oregon. (Individual, No Address - #1767.44110)

There are not any meetings being held in my home state of Maryland for me to attend. (Individual, Timonium, MD - #4827.44110)

The Gustavus Community Association and the people of Gustavus have a long history of involvement in Tongass issues. We would like the opportunity to comment on the Forest Service National Roadless Initiative, and request that you schedule a formal hearing here.

Please note that although the Forest Service is holding a hearing at Hoonah, it is not practical for those in our community to attend that hearing because of the time and expense of traveling there by air or water. (Local Community Organization, Gustavus, AK - #747.44150)

I believe the informational meetings did not tell the whole story and were conducted too quickly after the release of the DEIS. There was insufficient time to study the DEIS and ask responsible questions. (Individual, Salt Lake City, UT - #13258.44130)

Public Concern: The Forest Service should ensure that the meetings are fairly conducted.

Let me reiterate that I am a professional wildlife-biologist, former FS employee and that I have worked for the USDA and USDC for over 20 years. I know the CFR's and have a very well rounded working knowledge of the NEPA process. I am honestly quite embarrassed for the FS after hearing the last roadless presentation that I attended (Six Rivers NF, R-5). They had the gall to have their senior recreation person (and former rec staff officer) do the PowerPoint presentation ... how ironic, don't you think? (Individual, Kneeland, CA - #7085.41200)

I attended one of your public hearings in Portland, OR on June 21, 2000. Thank you for the fair minded way in which these were conducted. (Individual, Portolla Valley, CA - #11305.44100)

Procedure counts. The Forest Service must improve public meetings. Until the agency learns to write and speak specific, concrete, definite English—that is clear and precise—it will only draw the disrespect of the public. (Individual, Reno, NV - #7514.44100)

BY RESERVING LARGE ENOUGH MEETING ROOMS

I attempted to attend the Public Hearings on your proposed rule on roadless areas in Missoula, Montana on 6/21/00. . . . the meeting area was too small to hold the number of the people that wished to attend, and the Forest Service should have been responsible for holding the hearings in an establishment capable of holding a larger number of people...I believe your meeting area in Missoula was only capable of holding five to seven hundred people. I believe there is something very wrong about holding a “public hearing” and then denying access to any member of the public who wishes to attend. (Individual, Seeley Lake, MT - #9402.44110)

BY RECORDING COMMENTS AT ALL PUBLIC MEETINGS

I came a long way to have my comment recorded and no one was here to record. (Individual, Big Bear City, CA - #13472.44110)

Public Concern: The Forest Service should modify the PowerPoint presentation.

Your power point presentation on the Draft EIS was also biased. How can someone cut firewood in a roadless area and get it home without a road? How many Christmas trees are hauled out of roadless areas without a road to get it home on? The presentation seemed to be set up to put as positive a political spin on it as possible. (Individual, McCall, ID - #7575.42000)

[The] power point program was misleading in the fact that the acre used for urban development will not change public land management at all. (Individual, Spearfish, SD - #1448.44100)

The Roadless initiative, when combined with the revised travel plan guidelines, puts imbalanced priority on ecological concerns at the expense of recreational and economic concerns. This negatively impacts local users whose voice is muted by this imbalance. This means that the PowerPoint is misleading and disingenuous when it says that only new roads would be prohibited under the preferred alternative. In fact, under the Roadless initiative many roads and trails could be decommissioned without sufficient local public input simply to get them off the forest inventory. (Individual, Littleton, Co - #1219.72100)

On May 30, in Reno, we had the distinctly unpleasant experience of listening to a “PowerPoint” presentation on the Forest Service's Roadless Area Conservation Proposed rule and Draft Environmental Impact Statement. As a public information meeting, this presentation was confusing, given without the use of common sense or reasonable language, and altogether insulted the public's intelligence. Not only was the language of the presentation obfuscating, but also occasionally it was downright Orwellian. The emphasis on “local” decision-making, and the particular term used for communities who rely on exploiting and depleting natural resources was particularly repellent. (Individual, Reno, NV - #7514.44140)

Public Concern: The Forest Service should make its presentations in public meetings clear and accurate.

In our opinion, the informational meetings have not told the whole story. (Individual, Lake Havasu City, AZ - #2752.44140)

I appreciate the research and work that the Forest Service and BLM have done to present the options clearly to the public. (Individual, Great Falls, MT - #6444.31100)

The information meeting I attended left the public thinking they were still in the dark. We received distracting answers, the kind that didn't address the “meat” of the question. We received “double talk” answers, and those aren't my words, those were the words of those sitting around me. In some cases, we received no answer to a question; an even bigger insult. (Individual, Burbank, CA - #5655.44140)

BY PROVIDING MATERIALS AND DEFINITIONS

Public meetings were further lacking in materials and content that would explain the numerous new labels and definitions that are critical to public comment regarding such massive changes in federal land management. (Timber Association, Beaverton Oregon - #52230.44150)

BY USE LOCAL PHOTOGRAPHS AS EXAMPLES

About the presentation, I liked particularly the display maps, the take-home charts, and the booklet ROADLESS. I'd suggest that instead of slide-shows with readings that there be a few fine photographs of the country this plan will preserve. We might all spend several minutes in a quiet room with a good picture of the forests we know. (Individual, Concord, NH - #3428.44250)

THE SENATE SHOULD INVESTIGATE THE FOREST SERVICE'S HANDLING OF PUBLIC MEETINGS

I'm requesting that you hold Senate hearings on the US Forest Service's handling of public meetings and lack of a sufficient comment period. (Individual, Chicago City, MN - #1371.41300)

Public Concern: The Forest Service should allow people to bring signs to public meetings.

I have a sign that says simply "WE NEED WILDERNESS, NOT DEVELOPMENT," and I took it with me to the hearing for Uinta National Forest last week, and was made to leave it out in the hall. This to my opinion is taking our Freedom Of Opinion away from us. (Individual, Salt Lake City, UT - #15933.44150)

Public Concern: The Forest Service should consider the appropriateness of allowing preservation organizations to sell merchandise at public meetings.

I went to the Public Comment Meeting last night, 6-26-00 at the Doubletree Inn in Tucson, AZ. This was a meeting put on by the U.S. Forest Service. But the first thing I saw was a booth set up by the Sierra Club selling hats & stuff. What's up with that? (Individual, Tucson, AZ - #13835.44160)

2.4.2 Comment Period

Most individuals addressing the comment period for the proposed rule request extensions either because they do not believe 60 days is enough time to absorb the amount of material presented, or because they do not feel they knew about the comment period in time to give meaningful input. People express distrust in a process they feel is skewed toward more organized special interest campaigns and worry that their voice will be missed. Suggested extensions include an additional 60 days, 90 days, 120 days, until September, 2000, until December 31, 2000, and until the current administration has ended. At least one individual, however, writes that the comment period should not be extended. Some of these individuals note that protection for roadless areas has been delayed long enough.

Public Concern: The Forest Service should extend the comment period.

I am writing to request an extension to the comment period for the President's Roadless Initiative. I believe that additional time is needed to allow input from citizens who live in the impacted areas. (Individual, Boise, ID - #61.44430)

The scope and magnitude of this proposal is massive. The thought and comment time appear to be very limited, and it appears this is for political purposes of this administration. This massive attempt at confiscation of public lands deserves much more comment and "study time." (Individual, Ahsahka, ID - #63.44430)

I have concluded that there is insufficient time to perform a comprehensive analysis of this proposed rule. I make my argument based upon the fact that within the nearly 800 or more pages of text, tables, maps, and assorted summaries, there are additional untold pages of documents to review as well. When the main document refers to subordinate but controlling rules and regulations it is incumbent upon the reviewer to acquire them and review the relationships between any and all documents. (Individual, Sacramento, CA - #79.44430)

More time is needed to determine all of the details that are in the plan. (Individual, Rigby, ID - #5208.44430)

There has been insufficient time to adequately digest all of the information that is being provided, especially in light of incorrect, inaccurate, missing, confusing, and conflicting information. As an example, maps being prepared and placed into the record are changing on an almost daily basis. These maps and the designated area lines are crucial to this project. (Individual, Mammoth Lakes, CA - #13994.31000)

You have repeatedly refused to provide information, requiring filing under the Freedom of Information Act to learn just the basics of the proposal. You took only seven months to prepare a nationwide DEIS, then took five months to refuse a simple request for extension. (Individual, MacKay, ID - #8575.44200)

I don't think the Forest Service and especially the President, received accurate and fair input from all users of our forests. The extremist environmental groups, as you know are very well organized, funded and educated. The rest of us users of the forest trails and roads are not organized, funded and in many cases, not even educated...Many folks are against this proposal but have learned of it too late. Please take this into consideration when creating your final plan this winter. I was negligent myself in getting involved in this when I learned of it through my Trail Riding magazine a few months ago. (Individual, Riceville, TN - #6949.41000)

The FS, in conjunction with the release of the proposal and DEIS, scheduled 300 public meetings throughout May and June. The later meetings are for public input regarding the proposal. Therefore, it is necessary to have the proposal thoroughly analyzed prior to the hearings/meetings in June. The comment time frame actually provides for approximately 30 days to review nearly 1000 pages that affect over 55 million acres. Again, this is an incredulously insufficient comment period.

Additional time will afford the public the opportunity to provide the Forest Service with more thorough responses, thus aiding the agency in achieving a more mutually acceptable management approach. (Mining/Oil Company or Organization, Midland, TX - #2869.44430)

ADDITIONAL 60 DAYS

We believe that 60 days is not enough time for this important issue, and request an additional 60-day period for a total of 120 days. (Business/Business Association, Salem, OR - #54.44430)

Considering the scope of the program I am requesting that the 60 day comment period be extended an additional 60 days, for a total comment period of 120 days. I will need this time to adequately review and respond to this initiative. (Individual, Denver, CO - #59.44430)

Grayback Forestry Inc. strongly urges that the deadline for this Draft EIS comment period be extended for 60 days. There have been significant delays in the public receiving copies of the Draft Statement that makes it difficult to develop an informed opinion. (Business, Merlin, OR - #6354.44430)

ADDITIONAL 90 DAYS

I suggest that an extension of 90 days is added to the comment period to make up the time the public has lost because they have not even received the document at this point. (Individual, Sacramento, CA - #2834.44430)

Of equal concern is the inadequacy of the 60-day comment period, which is scheduled to close on July 17, 2000. It is clear that the FS is anxious to finalize the proposed roadless program without delay. However, there are many aspects of the proposal that require added time to digest and evaluate. As a result, the accelerated time frame imposed by the FS is inadequate for sufficient public review and response. Therefore, we respectfully request that the FS extend the comment period on the proposed roadless DEIS by 90 days in order to afford the public an opportunity to give the agency comprehensive high quality comments. (Wise Use or Land Rights Organization, Denver, CO - #6356.44430)

ADDITIONAL 120 DAYS

Your proposal is complex and needs careful review. I request a 120 day extension in the comment period so that it can receive full consideration. (Individual, Lakewood, CA - #105.44430)

This initiative has a major affect on many people and it appears to me that the 60 day comment period offered is incredibly inadequate. The consequences of this initiative need to be understood by all parties affected, consequently I would suggest at least six months of discussion with opportunities in all affected areas. (Individual, No Address - #56.44430)

The Southern Council hereby requests a 120-day extension of the public comment for the draft environmental impact statement (DEIS) and proposed regulations to protect roadless areas within the National Forest System. The original 60-day public comment period is completely inadequate to review and develop substantive comments on such a complex and far-reaching proposal. In order to develop substantive comments, the public will have to review and analyze the 500-page DEIS which many have not yet received. (Timber Association, Atlanta, GA - #2860.44300)

We ask that you consider the burden on the public of reviewing and preparing comments of multiple, complex regulatory proposals and extend the public comment period 120 days. The magnitude of the changes in national forest management and land and resource planning is enormous and cannot be fully reviewed in the allotted time. An additional 120 days is only a small request in relation to the length of time these regulations have been under revision and the potential impact of the changes being proposed. (Business, Portland, OR - #2872.443000)

Mountain City Lumber Company requests a 120-day extension of the public comment on the DEIS and proposed regulations to protect roadless areas within the National Forest System. The original 60-day public comment period just is not enough time for the public [to] review and develop educated comments on such a complex and far-reaching proposal. In order to submit educated comments, the public needs to be allowed proper time to educate itself on the 500-page DEIS which many have not received yet. (Business, Bloomery, TN - #2873.44300)

Two factors restrict the ability of local governments, counties, and conservation districts to adequately review the Draft EIS: 1) Over 350 sources of information were referenced (some even in press), and 2) The 60 day time frame to access, review, and comment on the conclusions of these references is unrealistic. The Forest Service must extend the comments period to 180 days to allow local governments adequate time to access and review the incorporated information. (County Elected Official, Sheridan, WY - #16187.44430)

UNTIL SEPTEMBER, 2000

I also request that the public comment hearings be postponed until September 2000 to allow myself adequate time to review the 700-page DEIS. The original 60-day public comment period is inadequate to review and develop comments [on] such a complex and far-reaching proposal that impacts management of 54 million acres. (Individual, Oroville, CA - #2846.44150)

UNTIL DECEMBER 31, 2000

I respectfully request that the public comment period be extended until the end of this year. (Individual, San Louis Obispo, CA - #43.44430)

I respectfully request that the public comment period be extended for a reasonable time (until the end of this year does not seem at all unreasonable based on the way this issue has been ramrodded down our collective throats). There is absolutely no reason to rush the comment period with a ridiculous deadline like your proposed July 17 date. (Individual, Roy, UT - #42.44430)

UNTIL THE CURRENT ADMINISTRATION HAS ENDED

We need more time and information to make an intelligent decision on these proposals. Under no circumstances should a decision be made until the current administration “expires.” We have seen way too much politically expedient abuse by them already (Calif, Utah, Ariz). Much more time should be taken before any decision! (Individual, Ahsahka, ID - #63.44430)

Public Concern: The Forest Service should not extend the comment period.

Please do not extend the comment period by 120 days. It’s a ploy by the timber industry to extend the comment period until Clinton leaves office. (Individual, Missoula, MT - #10482.41720)

2.4.3 Public Input

This section presents specific concerns regarding both the effectiveness of public input and ways in which the Forest Service could improve its public outreach. As mentioned in the previous section, many people request extensions of the comment period because they feel 60 days is insufficient time to analyze the proposed rule and other recent initiatives and make informed comment. That sentiment sets the tone for many of the comments received regarding public input. Some believe that education is the key to a better-informed public. These respondents do not feel the Forest Service does a good enough job explaining the effects of its actions. Indeed, some write that the scoping process was itself inadequate, resulting in an inadequately prepared Draft EIS. Many respondents believe the Forest Service should create more opportunities for public input by e.g. improving notifications and mailings; providing reliable internet access to documents; improving information access for those without computers; mailing out questionnaires; and surveying forest users.

Other concerns relate to the content of public comment, and how comments are treated by the Forest Service. One individual feels the Forest Service should avoid soliciting emotionally charged comments. This individual was offended “by the hypocrisy and hatred” expressed by several speakers at a public meeting. At the same time, another respondent believes the Forest Service should not announce the number of comments it has received while the comment period is still open as it can discourage further input. Many respondents, however, wonder whether it even makes any difference for them to comment. Claims one individual, “I know this comment will never see the light of day!” Remarks another, “I don’t think you will pay any attention to this. I’m sure that is how most Americans feel about our government.” Finally, several respondents express concern over the agency’s seeming lack of respect for employee comment. These respondents say they do not see any evidence in the Draft EIS or proposed rule that

employee input was considered. They are concerned that employees have been directed not to be involved and suggest the reason may be because so many out in the field are not in favor of this proposal.

Public Concern: The Forest Service should provide sufficient information regarding the potential effects of all recently proposed plans so the public may be better informed.

In particular, the agency is proposing a new transportation management policy that will affect forest plan revisions; it is proceeding with a planning rule in the absence of a complete strategic plan; it is proceeding with a roadless area policy which will override any and all planning efforts; and it is proceeding with forest plan revisions and amendments which ultimately may be altered by the national policy initiatives. In this context, it is clear that insufficient information is available for the public to provide informed comment on this roadless area protection proposal. (Individual, Bristol, VA - #1116.44010)

It would sadden me very much to see these areas closed; I believe that education is the key. Let people know that the closure of these areas could result in no one going into them. It could result in no timber harvest, which results in dead decaying timber that produces more gas than oxygen. It is vital that people be informed and understand the real influences that such measures will have in their lives. (Individual, Los Gatos, CA - #8668.44000)

Public Concern: The Forest Service should address the adequacy of the scoping process and subsequent information disclosed in the Draft EIS.

The scoping for preparation of the DEIS was inadequate under the National Environmental Policy Act (NEPA) and the National Forest Management Act (NFMA). Under binding NEPA regulations, there “shall be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action” that will be addressed in the EIS. 40 C.F.R. 1501.7. The Forest Service failed to provide the public with adequate information on the roadless area initiative to allow informed public comment on the scope of issues to be addressed or on the significance of issues related to the proposed action. For example, during the scoping stage, the Forest Service could not provide information on the location and area of the national forest lands affected by this proposal. Indeed, as discussed above, the Forest Service is still unable to identify all the lands that will ultimately be impacted by this proposal. (Mining Organization, Reno, NV - #15907.44410)

The DEIS is a flawed document due to the Forest Service's failure to perform adequate scoping. While the Forest Service [held] “scoping” meetings and sought public views on roadless issues, these public meetings and written comment period do not fulfill the function of NEPA scoping. The purpose of NEPA scoping is to allow the public to identify issues and alternatives associated with NEPA review of a proposed agency action. See 40 C.F.R. [section] 1501.7. But that purpose was not met regarding the proposed rule because the Forest Service, during this “scoping” activity, never adequately identified the land to be impacted by the initiative. Not once did the Forest Service during the “scoping” period provide a description of the proposed action that would allow the public to effectively participate in scoping the draft EIS. The Forest Service's failure to adequately identify the land to be impacted by its proposal at the time of the scoping activities made informed participation in the scoping process impossible. (Timber Industry or Association, Eugene, OR - #15879.7000)

Public Concern: The Forest Service should create more opportunities for public input.

More opportunities for citizen input need to be created and those opinions tabulated and respected as the will of the people. Economic interests cannot be given preference. (Individual, Salem, VA - #902.41510)

Given that historically leaders of our country had the insight to put these lands in the public trust, I encourage you to gather public comment from communities throughout the country not just from local communities bordering public lands. It has been my experience (living in a county that contains 70% public land) that these local folks believe they deserve more opportunity and voice in managing these public lands. It is imperative that the Forest Service does not neglect the rest of the Public who share an equal voice and opportunity to use public lands. These areas for which you propose no new roads are our National Forest and any citizen of the United States has an equal say in commenting on their management. (Individual, Dillon, MT - #7450.41500)

You have a fiduciary duty to conduct your public inquiries openly, impartially and fairly. (Civic Organization, Goleta, CA - #7088.44000)

What are the rules here—will someone respond to these concerns? (Individual, No Address - #7662.44400)

BY IMPROVING NOTIFICATION AND MAILINGS

The Forest Service purposely ignored rural communities by failing to properly notify us about public meetings and removing many people from your mailing lists. (Recreational Organization, Santa Fe, NM - #9442.44130)

If there is ever any change in the draft proposal to close, block off or restrict access to any existing roads, we wish to be notified. This would encompass improved, unimproved, and non-designated roads, such as the present roads to Wood Canyon, Santa Cruz Spring, Horse Shutumn Spring-Bell Clark Spring, etc., in the Spring Mountain National Recreational Area. (Individual, Mount Charleston, NV - #4023.71300)

It should be necessary to request an EIS before the Forest Service sends one. Unless it is asked for, it is a waste of paper and expensive. Please make that a policy of the Forest Service. (Individual, Longview, WA - #803.30000)

BY PROVIDING INTERNET ACCESS TO DOCUMENTS

Will the site accessing the DEIS be available soon? I tried it today, and only received an HTTP error. (Individual, No Address - #1318.44210)

I have attempted to download a copy of your proposed map. I have not been able to print a copy. (Individual, Enid, OK - #100.44240)

Your website request for a hardcopy is a link back to...that's right, the home web page! Is this a donkey powered merry-go-round or what? (Individual, Calpine, CA - #71.44210)

Agna [AngloGold North America Inc.] has tried on several occasions to download the DEIS from the USFS' website without any success. We eventually obtained a hard copy of the document from other sources due to inaccessibility from the website. The failure to obtain timely a copy of the DEIS and the enormity of the document strongly suggests that a 60-day comment period, as proposed by the USFS, is wholly inadequate. (Mining/Oil Company or Organization, Englewood, CO - #2878.44210)

Your website was very helpful, and well organized. (Individual, Oxford, PA - #8618.34100)

What a great web page—such appropriate use of technology! (Individual, Elton, MD - #6888.44210)

BY IMPROVING INFORMATION ACCESS FOR THOSE WITHOUT COMPUTERS

This discrimination is further against rural people, persons without access to computers, persons in certain socio-economic strata and to persons of certain race. These are expensive documents to print, mail and to review. We believe that this situation is in fact part of the intent of the Clinton-Gore Administration. The informational meetings held regarding this DEIS were not in compliance with the legal requirements of NEPA and NFMA. Public involvement by rural persons has been deliberately discouraged with these discriminatory actions. (Business Association, Beaverton, OR - #52230.54500)

BY MAILING OUT QUESTIONNAIRES

It is sad that not many people can take the time to show their interest in this proposal. Have you considered mailing out questionnaires? (Individual, Yoncalla, OR - #752.44000)

BY SURVEYING FOREST USERS

I question the survey results on your web page. As we all know, surveys can say anything you want them to say based solely upon who you chose to survey. A better way to survey might be to ask questions when hunting/fishing licenses are purchased; to survey those coming into national and state parks; to survey families enjoying a picnic in a forest park or wayside. This would give you the opinion of more than environmentalists or others with big lobbying groups and large memberships and an endless supply of stamps. (Individual, Krakow, WI - #1750.44210)

Public Concern: The Forest Service should avoid soliciting emotionally charged comments.

I was offended by the hypocrisy and hatred that was prominent in the speeches at the meeting. One person, adamant on closing all roads and halting all timber cutting, drove 150 miles of forest roads that day to verify timber cuts, some of which she stated were on privately held land. Another stated that to drive a vehicle in HIS forest allows him the right to drive a backhoe in your yard. Another stated that the animals scream for you to “get the hell out.” It concerns me that the Forest Service is soliciting this type of “scientific research” for the stewardship of the National Forest that belongs to all of the American people. (Individual, Oroville, CA - #17813.44100)

Public Concern: The Forest Service should not announce the number of comments received while the comment period is open.

We must conclude with our most serious concerns for the approach that you have chosen to utilize in public involvement in the Roadless Area Conservation policy proposal and DEIS. It is obvious that public involvement has evolved from the intent of NEPA and NFMA to a political tool for substantiation of your agenda. This amounts to political and undue influence of a very few over the management of huge federal land areas that effect all Americans. This is especially of great concern to those rural persons living closest and in an economic relationship that is dependent of those federal lands. It is inappropriate, at best, for your agency to publicly announce the number of comments received during a public policy making process. The use of numbers and statements that include “nearly 365,000 written responses to the notice of intent” have implied strong support for the Preferred Alternative. This serves to discourage those of us who have considered and analyzed the contents of the proposed policy and the DEIS. (Timber Association, Beaverton Oregon - #52230.44410)

Public Concern: The Forest Service should give assurance that the public’s comments are considered.

Most of us wonder if our comments will ever be considered. Your rush “to get this done--damn the consequences” is recognized. (Business/Business Association, Boise, ID - #75.42000)

I know this comment will not see the light of day! (Individual, No Address - #2482.42000)

It was...stated that no roads would be closed without public comment, and I am finding that roads are already being closed without public comment. I believe that we have already been lied to by the Forest Service. (Individual, Las Cruces, NM - #2775.42000)

I don't think you will pay any attention to this. I'm sure that is how most Americans feel about our government. That is sad, please don't forget you are here to serve us. (Individual, Spanaway, WA - #3241.42000)

You call for the public to comment, but I hardly can believe it really matters and that you really will listen or consider what the people of this Great Northwest want for their families' lives. (Individual, No Address - #7082.43000)

Many of my friends and neighbors are so frustrated with the continued attack on their way of life and the area we live in that they are not responding to this most recent attack by the administration. They do not think that anything they say will make a difference and so are not saying anything. I challenge you to prove them wrong and keep my comments in mind as you develop your plans. (Individual, Oldtown, ID - #6697.41510)

Public Concern: The Forest Service should consider input from Forest Service employees, and clarify its policy regarding such input.

14,000 Forest Service employees who oppose this action and stated so in a letter can't all be wrong. These are the people who know the ground and how to manage it. It is obvious that the information in this DEIS does not represent input and good science from the people who work on the national forest. (Individual, Hayden, ID - #13704.41200)

When I contacted the district rangers (12) about their roadless area characteristics and values, their response was that the proposal was put together at a higher level and that they were only asked to provide the inventory maps and acres. (Individual, McMinnville, OR - #10391.41240)

Also, we hear that the rank and file of the Forest Service is really not in favor of this proposal as it's presently constituted. We think, as I said before we think that they should have a voice also. (Individual, Kellogg, ID - #21153.41240)

I am deeply concerned by a conversation that I had with another person regarding the ability of public employees to comment on the Forest Service roadless initiative. I was distributing literature and collecting signatures and addresses on the Sierra Club postcards favoring the initiative, when I asked a young woman if she would sign on. She replied that she wanted to, but would be disciplined if she did so, as she works for the Soil Conservation Service, and that all USDA employees are forbidden from doing this by what she referred to as an "ethics and conduct memo" that came from you regarding political activities.

I strongly hope that she misunderstood something, and that this isn't true. If it is, it is an infringement upon basic human rights of political activism and organization that is better suited to a third-world dictatorship, not the United States. I am also suspect of whether such a policy is even legal, as I am aware of other cases in which a federal agency attempted to discipline an employee for political activism but was turned back by the courts (refer to Todd Wilkinson's recent book, "Science Under Siege").

I simply want a clear answer from you about whether this policy is the case, and whether it is legal. I look forward very strongly to hearing your response. (Individual, Forest Lake, MN - #9001.42000)

2.4.4 Analysis of Public Comment

Concerns over the analysis of public comment cover the actual validity of public comment, how those comments are considered, and the content analysis process itself. The validity of comment is an issue for several groups and individuals. According to several respondents, the Forest Service should consider that public comment is sometimes based on inaccurate assumptions or information. This may be due to inadequate understanding of the proposal or, as a number of respondents maintain, due to the unsavory methods used by special interest groups. According to one individual, "The 'Alaska Rainforest Campaign' who is backing the roadless issue here in

Ketchikan, is running this campaign very underhandedly. They are stopping people on vacation off the cruise ships, asking them, and I quote, ‘Would you like to help save the Tongass National Forest? Sign here.’ They are getting lots of signatures from people that do not even understand the issues, that do not live here, that are on vacation and will sign almost anything.”

Respondents are thus concerned that the large volume of post cards submitted by special interest groups do not accurately represent public sentiment.

Likewise some respondents advise the Forest Service not to put too much stock in comment offered at public meetings. Both those in favor and those opposed to the proposed rule write that they felt too intimidated by the large, vocal groups representing the other side to dare stand up and speak their own opinion. Even when individuals do submit their comments, however, many wonder whether their opinions will count as much as those of special interest groups. Some ask, further, how much weight is given to local comments, suggesting--as has been noted elsewhere--that local concerns should be given priority.

Finally, some respondents express concern over the content analysis process. Some charge that the comments received during the scoping period cannot possibly have been adequately considered, given such a large volume and short turn around time for release of the Draft EIS. Another respondent feels the process does not result in a satisfactory product as the summary does not quantify public opinion. In addition, others assert that this process for gauging public opinion is inherently faulty. Claims one individual, “What you are doing is akin to a call-in poll and has the same inherent fault in its lack of validity. This creates the impression of Forest Service complacency.”

Public Concern: The Forest Service should consider that written public comment is sometimes based on inaccurate assumptions or information.

In most cases OHV users are conservationists too, who care about preserving our wild lands for future generations. However, preservation and conservation mean different things. In the past public land has belonged to the “public” we had access to it. We could travel across most all of it with only a few areas that were off limits. We taught people to respect the land. This is what the average person thinks when someone asks them if they are in favor of protecting our wild lands, and they respond yes unaware it really means they will no longer have access to it or at least limited access. (Individual, Norman, OK - #5770.10212)

DUE TO INADEQUATE UNDERSTANDING OF THE PROPOSED RULE AND THE TONGASS EXEMPTION

[PVOA supports] TONGASS NATIONAL FOREST ALTERNATIVE T1. It should be recognized and expected that a Tongass exemption will serve as [a] lightning rod for various interest groups and may attract a prolific number of comments that may be based on considerably less than accurate knowledge about the region. (Business/Business Association, Petersburg, AK - #7542.41700)

DUE TO METHODS USED BY SPECIAL INTEREST GROUPS

I ask you to evaluate the “postcard campaign” originating in Ketchikan as using uneducated tourists in a spur-of-the-moment, emotional response. (Individual, Ketchikan, AK - #6990.41710)

The “Alaska Rainforest Campaign” who is backing the Roadless issue here in Ketchikan, is running this campaign very underhandedly. They are stopping people on vacation off the cruise ships, asking them, and I quote, “Would you like to help save the Tongass National Forest? Sign here.” They are getting lots of signatures from people that

do not even understand the issues, that do not live here, that are on vacation and will sign almost anything. These people will never try to subsistence hunt and fish to feed their families, they do not know what it is like to live here. The people that are part of the Rainforest Campaign here in Ketchikan have not even been in the Tongass Forest! They are from down south and have come to our city to get signatures to support the roadless issue. I feel this is a very low and underhanded tactic, and it makes me mad! (Individual, Ketchikan, AK - #8117.41710)

I also think that the Sierra Club post cards should be denounced. These cards are not an individual's opinion; but an opinion of a few controlling/brainwashing figureheads of the green movement. (Individual, Auburn, WA - #47895.41700)

I joined the Sierra Club in 1972 because of my continuing agreement with their mission statement--to explore and protect wild places. Unfortunately the Club has strayed into territory far beyond this goal and are much more given to emotional ranting than reasoned analysis. I mention this so you will realize that the Club representatives do not speak for all members. (Individual, Oklahoma City, OK - #6854.41710)

When environmentalists claim that "after the forests are gone, there won't be anything left," they are misrepresenting the truth. Our forests are actually some of our most renewable resources. Today land that was clear-cut 50 years earlier is green and beautiful, providing shelter for thousands of species of plants and animals. The Clinton Administration that conceived of this proposal paints images of destruction and devastations that provoke fear of losing the natural beauty that we still have. These images are far from reality and are blatant misrepresentations of our sustainable, renewable forests. (Individual, Salt Lake City, UT - #6753.84000)

Public Concern: The Forest Service should consider that public meeting comment is skewed.

I would like to comment that I do not believe you have a fair representation of comments at this meeting. The number of pro multiple use representatives was so large that they were asked not to attend, but rather were allowed 3 minutes by one representative. (Individual, Missoula, MT - #10882.44150)

It was an insulting headline in our local newspaper, Daily Sitka Sentinel, which convinced me to write to you. It read, "Sitkans Say No to Roads in Tongass." Well, I am a Sitkan, and I say "Yes!" The article went on to say that around half of the 100 people present testified to an opposite view than mine, and only two spoke in favor... I keep my mouth shut in public so as not to be ostracized from a portion of my community. Please don't look merely at the numbers testifying as representative of the majority view in our town or in any region. (Individual, Sitka, AK - #11407.41710)

The meetings are packed with tree huggers and the average person does not even know that these meetings are being held. These meetings were purposely held during the Christmas season when most people are busy shopping and traveling to other places. (Individual, Rutland, VT - #14402.44100)

Park Falls lumber mills would be closing early so that their employees could fill this comment hearing room. This corporate manipulation of public attendance and input is wrong, and I did not want to participate in such a 'stacked deck.' I know from past experience that local hearings like this one in small rural communities are too often dominated by commodity, corporate, and/or motorized recreational interests, and those with different viewpoints are unfairly intimidated. (Individual, Ashland, WI - #15044.41720)

We are scared in our area to say much at the public meetings, but there seem to be a great many of us who bitterly oppose and resent the strong arm, money driven efforts of groups like "People for the USA" to take over the discussion and open areas to further destruction that should be protected for our children as wilderness. Again, please do everything that you possibly can to stop such efforts and preserve and heal the wild areas that we still have left. (Individual, No Address - #6378.41730)

Public Concern: The Forest Service should consider opinions of individuals equally with those of special interests.

I hope that the people who have no money for lobbies can have their opinions counted equally. (Individual, Erie, CO - #6153.41500)

I don't know how us "average" folk can fight against the powerful lobbies of the timber, mining and recreation vehicle groups (like snowmobiles) except to write to someone like you who could speak out for us. I live in Colorado because it is one of the prettiest states in the country. I am sick of seeing all the roads being cut in our national forests and I wonder whose forests they really are? (Individual, Erie, CO - #6153.41700)

Public Concern: The Forest Service should disclose how much weight is given to local comments.

Will local comments be considered more in the analysis than others? (Individual, Pocatello, ID - #2959.41510)

This land is owned by the people of the United States and should be governed by a majority of the people in the area that it is located. The majority of the people in Utah want the forestland and BLM land left to be used by the people for the people. (Individual, Gunnison, UT - #10770.41510)

Public Concern: The Forest Service should acknowledge that comments received during the scoping period were not adequately considered, given such a short turn around and large volume.

THE URGENCY TO GET SOMETHING DONE BEFORE THE ADMINISTRATION CHANGES HANDS IS SHAMEFULLY COMPROMISING DUE PROCESS. For example, we believe the written comments during the scoping period were not adequately considered. There were only 27 weeks from the October 19, 1999 Notice of Intent date to the May 10, 2000 DEIS release. It would take 28 people working 40 hours per week to evaluate the 365,000 responses, IF they spent only a menial 5 minutes per response (assuming all responses were available during the evaluation period). Is this a comprehensive and reasonable review of such an important topic? (Recreational Organization, Salt Lake City, UT - #15896.44410)

Public Concern: The Forest Service should improve its quality of content analysis.

This proposal was supposed to have been guided by the public comments submitted and analyzed by the Comment Analysis Enterprise Team. I have read the report published by this group. The report is written in a manner that makes it nearly impossible to determine public desires with the exception of the fact that no one likes the proposal. The report only gives a total number of comments and then breaks them down into categories and gives "representative" examples of each category. Almost every category included pro and con sentiments. There were no statistics given as to quantity of comments in each category or whether they were pro or con. An additional element missing that was used by the BLM in their development of a management plan for Escalante was a listing of all parties who commented and what category their comments fell into. By looking at this data, it is possible for an individual to determine if their comments were received and if they were categorized correctly. This becomes an issue when you see comments in the DEIS that are in conflict with comments received and reported by the CAET. (Recreational Organization, Huntsville, AL - #10130.41230)

Public Concern: The Forest Service should address its process for gauging public opinion.

This whole process is supposedly driven by public input, the problem is that the validity of the public input is not being addressed. Instead of valid public opinion surveys based on scientific methodology, what you are doing is akin to a call-in poll and has the same inherent fault in its lack of validity. This creates the impression of Forest Service complacency. (Individual, Sovey, MI - #670.42000)

The Forest Service is fond of saying that management direction is not determined by a voting process, yet this action is predicated on the assumption that the “majority of Americans” want it, based on questionable polls conducted by various special interests. That is indeed no way to manage our national forests. (Individual, Loveland, CO - #11335.41000)

At the Forest Services’ Ellensburg “Informational Meeting,” the question was directly asked concerning why the Forest Service appears to be dismissing the public's expressed will to stop logging the roadless areas. The response was that the Forest Service doesn't “hold voting contests to decide its management policy”—or words to that effect. Further, that “there are many other factors that have to be considered to arrive at a policy.” (Individual, Ellensburg, WA - #10835.44160)