

Chapter 4 Alternatives and Rule Development

This chapter contains concerns regarding the development of alternatives and the proposed rule. Public comment in this chapter is divided into ten sections: Development of Alternatives will be covered in Section 4.1; Range of Alternatives in Section 4.2; New Alternatives in Section 4.3; Prohibition Alternatives in Section 4.4; Procedural Alternatives in Section 4.5; Tongass Alternatives in Section 4.6; Alternatives Considered but Eliminated in Section 4.7; Additional Areas for Inclusion in Section 4.8; Exemptions to the Proposed Rule in Section 4.9; and Proposed Rule Development in Section 4.10.

4.1 Development of Alternatives

The development of alternatives for the proposed rule elicited numerous comments from a variety of respondents. One person suggests that the Roadless Initiative be separated into three parts: one that addresses activities to be restricted, one that addresses off-road recreational use, and one that addresses other management issues in these areas. Another individual notes that the proposed rule assumes that the No Action Alternative reduces roadless area values while the other alternatives either conserve or increase roadless values. This person requests that the Forest Service clarify why the value of roadless areas differs under the various alternatives of the proposed rule.

In addition to the general comments regarding alternative development, some people offer alternative-specific suggestions. While one individual believes that the Forest Service should address contradictions between Alternatives 2 and B, another suggests that the Forest Service combine Alternatives 2 and 3 in order to protect areas from timber harvesting.

The No Action Alternative is contentious for many. One wise use organization suggests that the Forest Service compare all proposed action alternatives with the No Action Alternative so as to remain consistent with other forest plans. A timber industry representative, also concerned with forest plans, states that the Forest Service is using the timber volume in fiscal years 1996 to 1999 as its No Action baseline. This person believes that the Forest Service should use the timber sale level as proposed in forest plans as the baseline for comparing alternatives.

Other respondents question the general direction of the proposed rule. One person believes that the proposed rule's alternatives should focus on the best way to manage land and resources rather than on prohibitions. Another citizen, believing that the local forest manager should not have discretionary power regarding roadless areas, exhorts the Forest Service to delineate exactly what activities will be allowed in roadless areas in the Environmental Impact Statement. "The local manager is constantly under pressure from local politicians, ORV groups, loggers, ranchers, mining companies, local developers, etc. to allow all types of activities in our national forests which would be detrimental to the environment," this individual proclaims.

Public Concern: The Roadless Initiative should be separated into three parts: one that addresses activities to be restricted, one that addresses off-road recreational use, and one that addresses other management issues in these areas.

The roadless initiative should therefore be separated into three parts. Part One would address the need to protect our forest from mining, timber logging and development activities and to prevent clear cutting and harvesting of vegetation on or within these designated areas. Part Two would address the need to provide areas for off road recreational use. Possibly designating specific areas for a specific recreational use in order to protect these areas but also for the government to provide recreational access to public lands. A lockout of these lands would no longer mean public lands. Part Three would involve the U.S. Forest Service's duties and responsibilities for managing these designated areas. This would include plans of action for forest fires, natural disasters, monitoring the protection of the forest from mining, logging and timber industries. Also to include the possible development of recreational uses in designated areas. Monitoring or limiting the number of people in these areas. Setting regulations and standards for hiking, bicycling, horseback riding, fishing, hunting and off-road vehicle use. (Individual, Magnolia, DE - #2712.61300)

Public Concern: The Forest Service should clarify how the value of roadless areas would differ under the various alternatives of the proposed rule.

It is stated in the Proposal that areas without roads have nine (as listed) inherent values and characteristics. As one then follows the alternatives the assumption seems to follow that the "No Action" Alternative A reduces value and as one "progresses" towards other alternatives value is conserved or increased. This assumption takes a powerful lot of liberty with objectivity and as far as I know comes with little or no data. (Individual, International Falls, MN - #9195.64000)

Public Concern: The Forest Service should address contradictions between Alternatives 2 and B.

Alternatives 2 and B seem to be somewhat contradictory—why? (Individual, Pocatello, ID - #2959.6200)

Public Concern: The Forest Service should combine Alternatives 2 and 3 in order to protect areas from timber harvesting.

Since only four percent of projected NFS timber harvest was to come from IRA's this is an insignificant portion of total domestic harvest. Only five percent of national wood production comes from NFS lands. Four percent of five percent leaves one quarter of one percent of the domestic timber supply affected by this proposal. This leads me to believe that a fusion of prohibition alternatives 2 and 3 may be favorable; some IRA's would best be left alone entirely with very limited harvest activities in others. These areas could be selected after further analysis that considers factors such as proximity to other protected areas, habitat diversity, size, and position in the landscape. We can and should err on the side of conservation. (Individual, Leavenworth, WA - #15897.61300)

Public Concern: The Forest Service should compare all proposed action alternatives with the No Action Alternative.

All proposed action alternatives need comparison with "No Action" (current use-prior to the new roads moratorium) to remain consistent with all national forest planning. (Wise Use Organization, Rock Springs, WY - #2866.64000)

Public Concern: The Forest Service should use a proper baseline for comparing alternatives.

THE DEIS USES AN IMPROPER BASELINE FOR COMPARING ALTERNATIVES AGAINST THE “NO ACTION” ALTERNATIVE AND THUS SERIOUSLY UNDERESTIMATES THE ECONOMIC IMPACTS. 1. LEGAL DEFICIENCIES. The DEIS engages in misdirection which hides the true socioeconomic impacts of the substantial reduction in timber volume attributable to the rulemaking. The Council on Environmental Quality has stated that the impacts of the “no action” alternative (the baseline used for calculating the incremental impacts of the alternatives) in forest planning should be the projected impacts of continuing to implement the forest plan. [Where a proposed action would] updat[e] a land management plan.... “no action” is “no change” from current management direction or level of management intensity.... Therefore, the “no action” alternative may be thought of in terms of continuing with the present course of action until that action is changed. Consequently, projected impacts of alternative management schemes would be compared in the EIS to those impacts projected for the current plan. 46 Fed. Reg. 18026, 18027 (March 1, 1981) (CEQ’s Answers to 40 Most Asked Questions on NEPA Regulations). Yet, the DEIS does not compare the impacts of the roadless rulemaking to the “impacts projected for the current plan” if the full level of timber sales projected in the forest plan (the timber sale schedule level, SEE 36 C.F.R. 219.16) are conducted. Instead of using the timber sale schedule level prescribed by timber plans, the lower “timber volume in FYs 1996 to 1999 was used in developing the baseline for the No Action Alternative.” DEIS at 3-182. Since use of this baseline is contrary to CEQ’s direction, the correct baseline should be employed (or at least portrayed as an alternate basis for comparison) in the final EIS. (Timber Industry, Eugene, OR - #15879.54100)

Public Concern: Alternatives in the proposed rule should focus on the best way to manage land and resources rather than on prohibitions.

Alternatives should focus on the best way to manage these lands and their resources, not how to prohibit uses by the American people. (Recreational Organization, Saint Charles, MN - #6878.84000)

Public Concern: The type of activities to be allowed in roadless areas should be clearly spelled out in the Environmental Impact Statement.

None of the alternatives are acceptable. The local forest manager SHOULD NOT have the power to determine the type of future activities allowed in roadless areas. INSTEAD THE TYPE OF ACTIVITIES TO BE ALLOWED SHOULD CLEARLY BE SPELLED OUT IN THE EIS. The local manager is constantly under pressure from local politicians, ORV groups, loggers, ranchers, mining companies, local developers, etc. to allow all types of activities in our national forests which would be detrimental to the environment. If the local forest manager is given the final authority on this issue there is 100% chance that many roadless areas will suffer irreparable future damage. (Individual, Richland, WA - 31006.64200)

4.2 Range of Alternatives

Several respondents suggest that the Forest Service should expand the range of alternatives for the proposed rule. The use of temporary roads for forest management should be included among the alternatives, according to one person. An Idaho resident believes that the EIS should include a range of alternatives that varies the amount of roadless acres.

“Except for Alternative 1, No Action, there is not a distinct difference between alternatives,” posits one elected official. Citing a similar concern, one citizen believes that the Forest Service

should not attempt to create one generalized alternative to cover all the disparate roadless areas of this nation.

Other respondents offer alternatives they believe would create a suitable range of alternatives. “One alternative should clearly be that road building and access are pursued in these areas and they are released into multiple-use management,” suggests one constituent. Another individual believes that the Forest Service should consider an alternative that addresses the impacts of recreation, timber, and mineral interests in Regions 8 and 9. “The DEIS needs to consider such an alternative,” this person states. “Short of that, the DEIS cannot be said to be adequate.”

Public Concern: The Forest Service should expand the range of alternatives for the proposed rule.

The scope of the alternatives is too narrow. (Individual, Eugene, OR - #537.60000)

The NOI is deficient in the range of alternatives, which is difficult when you do not know what lands you are talking about. (Individual, Titusville, PA - #905.60000)

For a document of this magnitude and potential impact, additional alternatives should have been fully developed and evaluated that ensure the forest management is done in a consistent manner within the scope of this proposed rule and the NFS Road Management Strategy. (Individual, San Diego, CA - #2876.63000)

ALLOW THE USE OF TEMPORARY ROADS

The Forest Service has not presented a reasonable range of alternatives. The use of temporary roads to address forest management is an alternative that should be included. (Individual, Paonia, CO - #11343.61300)

The Forest Service should have considered an alternative which would allow access to roadless areas by temporary roads. Temporary roads or winter roads are common in the Lake States Region and have a negligible impact on the key Forest Service considerations of water quality and biodiversity. Temporary roads would allow access for timber harvest, preserving forest health and ultimately improving biological diversity. (Timber Association, Iron Mountain, MI - #43202.61300)

VARY THE AMOUNT OF ROADLESS ACRES

The EIS should include a range of alternatives that varies the amount of roadless acres, or the amount of roadless areas, for which environmentally sensitive multiple use road construction is allowed. (Individual, Lewiston, ID - #10607.60000)

We also believe the Forest Service should develop a wider range of alternatives that vary the amount of roadless acres or the number of roadless areas for which environmentally sensitive road construction is allowed. (University/Professional Society, Helena, MT - #11164.60000)

Public Concern: The Forest Service should provide alternatives that have distinct differences.

Except for Alternative 1, No Action, there is not a distinct difference between alternatives. Review of S-1 on pages S-18 through S-23 shows that the results from Alternatives 2, 3, and 4 are about the same. (County Elected Official, Quincy, CA - #16184.60000)

Public Concern: The Forest Service should not attempt to generalize any alternative.

I feel the idea that we can generalize an alternative is incorrect. An example is an old growth forest would use alternative #4, because it obviously could take care of itself and we could harvest “tree lots” and not spoil the wild places. And yet a place previously logged could use alternative #3 to help it return to a healthy environment. (Individual, Colville, WA - #1027.64400)

Public Concern: The Forest Service should consider an alternative that allows road building, continued access, and multiple use management.

One alternative should clearly be that road building and access are pursued in these areas and they are released into multiple-use management. (Individual, Titusville, PA - #905.60000)

Alternatives must be expanded to permit road construction in some of the roadless areas to help the economy and for job opportunities in our northern region. (State Elected Official, Sandpoint, ID - #10682.60000)

Public Concern: The Forest Service needs to consider an alternative that carefully considers the impacts of recreation, timber, and mineral interests in Regions 8 and 9.

Considering the significant ecological problems throughout the region 8 and 9 of the Forest Service, and the significant pressures upon those forests from the recreation, timber, oil, and mineral interests, it is critical that impacts of allowing significant disturbances into these areas needs to be carefully considered. These regions need to have their remaining contiguous habitats protected from these significant disturbances. The DEIS needs to consider such an alternative. Short of that, the DEIS cannot be said to be adequate. (Individual, Brookport, IL - #126.82000)

4.3 New Alternatives

Rather than suggesting specific changes to the development of alternatives or the alternatives themselves, a few respondents propose completely new alternatives. One citizen believes that the Forest Service should develop an “access for all” alternative. Another individual exhorts the Forest Service to prepare an alternative that assigns the decision-making authority based on local conditions.

One environmental organization has prepared its own “Preservation Alternative.” This alternative should be included in the Final EIS as a new Alternative 5, according to this group. A timber industry representative believes that the Forest Service should consider an alternative that would not ban road construction in inventoried roadless areas that were considered in post-1995 revisions to forest plans. One elected official suggests that the Forest Service consider an alternative that allows leasable mineral extraction and analyzes and compares those impacts with the No Action Alternative. An environmental organization suggests an alternative that returns to Native Americans land ceded to the Federal Government by treaty. One individual requests that the Forest Service develop an alternative that prohibits road building and timber harvest in roadless areas that are sources of drinking water.

Public Concern: The Forest Service should develop an “access for all” alternative.

I ask the Forest Service to develop and evaluate one or more “access for all” alternatives in the EIS which would allow roads access and the full range of multiple uses of some or all of the roadless areas. The EIS should include a range of alternatives that vary the amount of roadless acres, or the number of roadless areas, for which environmentally sensitive multiple use road construction is allowed. (Individual, Hayden, ID - #13704.63000)

Public Concern: The Forest Service should prepare an alternative that assigns the decision-making authority based on local conditions.

To correct the situation, I would recommend the roadless area evaluation begin at the field level through the forest planning process. For roadless areas that contain roadless values and characteristics that appear to outweigh the human uses, and the social and economic factors, a report and recommendation would be submitted to the chief for a national decision. For roadless areas that have human values, and social and economic values that outweigh the roadless area values and characteristics, the prescribed management direction would be made by the regional forester for the next planning period. Such a preferred alternative could be included in the final rule, following site specific evaluation, as an alternative embracing both the no action and the prohibition alternatives. (Individual, McMinville, OR - #10391.61300)

Based on our understanding of the roadless regulations, it appears that every surface disturbing action in a designated roadless area will require an EIS since, ostensibly, the applicable requirement is satisfied of a potential “major federal action significantly impacting the human environment” as required by NEPA. Presently, proposed surface disturbing activities within “roadless” areas are handled under NEPA as appropriate, which may entail merely a Categorical Exclusion or Environmental Assessment – Rather than always requiring an EIS. Retaining some ability to perform appropriate NEPA analysis tailored to the activity involved, rather than eliminating appropriate discretion and always requiring an EIS, would reduce unnecessary Forest Service workload and allow timely activities by proponents. Moreover, if the Forest Service disagrees with the existing practice of allowing appropriate NEPA analysis, then the Forest Service must clarify how every EIS for activities in a roadless area somehow appropriately triggers and satisfies NEPA’s mandate of a major federal action significantly impacting the human environment necessitating an EIS. (Mining/Oil Company or Organization, Washington, DC - #52224.54100)

Public Concern: The Forest Service should adopt a new Alternative 5.

We have reviewed the DEIS and do not support the preferred alternative proposed by the Forest Service. We do support, in accordance with our comments of December 20, 1999, a modified Alternative 4, which should be included in the Final EIS as Alternative 5: the Preservation Alternative. (Environmental/Preservation Organization, Willits, CA - #6908.61300)

Public Concern: The Forest Service should consider an alternative that would not ban road construction in inventoried roadless areas that were considered in post-1995 revisions to forest plans.

We urge the Forest Service to consider an alternative that would not ban road construction in inventoried roadless areas that were considered in post-1995 revisions to forest plans. This alternative has the advantages of: (1) respecting the analyses conducted and multiple use decisions made on roadless areas in recent forest plans, (2) respecting the public comment on roadless areas in recently revised forest plans, and (3) making the millions of dollars recently spent in revising forest plans worth something, by not overriding recent plan decisions on appropriate uses of individual roadless areas. (Timber Industry, Eugene, OR - #15879.64400)

ALTER.818 Public Concern: The Forest Service should create a leaseable minerals alternative.

The Forest Service needs to consider an alternative that allows leaseable minerals and analyzes the impacts and compares those impacts against the No Action Alternative. (County Elected Official, Fallon, NV - #17290.60000)

Public Concern: The Forest Service should consider an alternative that returns treaty-ceded lands to traditional native peoples.

The EIS should also develop alternatives that return treaty-ceded lands to traditional native peoples (as distinctly different from BIA created corporate controlled “Tribal” Councils) to be held in perpetuity as natural ecology and wildlife reserves. (Environmental/Preservation Organization, Fossil, OR - #52433.56000)

Public Concern: The Forest Service should consider an alternative that prohibits road building and timber harvest in roadless areas associated with drinking water.

Please provide an alternative that stops these activities [road building and timber harvest] only on the roadless areas that are directly associated with drinking water. (Individual, Darby, MT - #27855.70000)

4.4 Prohibition Alternatives

Public comment regarding the proposed alternatives generally falls into three categories: support for a given alternative, requests for modification of a given alternative, or opposition to a given alternative. Many people’s support of or opposition to a given alternative is largely influenced by the degree to which the alternative promotes resource protection, provides recreational access, and restricts road building, logging, and mining. The reader should note that public concerns addressing alternatives with respect to specific resource areas are included in the appropriate resource area sections of this analysis document. General comments regarding the Prohibition Alternatives will be analyzed forthwith.

Page 3-122 of the Draft EIS states: “An underlying assumption in Alternative 1 is that inventoried roadless areas, outside of Wilderness and other designated areas, are available for resource management activities that may degrade their unroaded characteristics.” According to one elected official, this is a false assumption because forest plan prescriptions govern which activities are allowed and which are prohibited on National Forest lands. This official believes that this assumption will significantly overestimate the effects of road construction, reconstruction and timber harvest in the No Action Alternative and underestimate the effects on the Prohibition Alternatives.

The clarity of language of the alternatives is a concern for some. One person notes that the summation of Alternative 2 does not mention logging, although the actual language of the alternative does not preclude this activity. On a similar note, another individual requests that the Forest Service explicitly explain what criteria were used to determine that road construction and timber harvest would qualify as prohibited acts.

One individual believes that the Forest Service should implement Alternative 3 west of the 100th meridian and Alternative 4 east of it in order to properly address the ecological differences of the two areas.

Specific public concerns regarding the actual alternatives will be addressed in following Subsections; 4.4.1, Alternative 1; 4.4.2, Alternative 2; 4.4.3, Alternative 3; 4.4.4, Alternative 4.

Public Concern: The Forest Service should address false assumptions in the Prohibition Alternatives.

Comment: Page 3-122, Alternative 1, first paragraph-- This paragraph states that the "...underlying assumption in Alternative 1 is that inventoried roadless areas, outside of wilderness and other designated areas, are available for resource management activities that may degrade their unroaded characteristics." This assumption is totally false for two reasons: 1) The document itself (Page 3-1, Overview of Inventoried Roadless Areas) states that "...road construction and reconstruction is already prohibited on about 20.5 million acres," and 2) forest plan prescriptions govern which activities are allowed to take place and which are prohibited within given areas of a National Forest. If this assumption was used, as stated, then this analysis has little credibility to adequately determine effects of any of the alternatives. Relief: The Forest Service must eliminate this assumption and develop an assumption that reflects an accurate scenario. The assumption, as written, will significantly overestimate the effects of road construction, reconstruction and timber harvest in the "No Action" alternative and underestimate the effects on the prohibition alternatives. (County Elected Official, Worland, WY - #16185.70000)

Public Concern: The Forest Service should clarify the prohibition alternatives dealing with timber harvest.

I just had a couple of comments on the draft environmental impact statement. The first is in the description of the alternatives. I note that Alternative 2 in its description up front doesn't mention that logging would continue in inventoried areas just without roads, and we could continue through cables and from the air. I think that's a really important point because a lot of people who may be opposed to logging might still vote for No. 2 because from the impact statement you can't really tell that logging would continue. It's only from another source that became clear. (Individual, No Address - #21329.33200)

Public Concern: The Forest Service should explain what criteria were used to determine that road construction and timber harvest qualify as prohibited acts.

Under the question concerning how the FS determined what activities to include under the prohibition and procedural alternatives, it would be helpful to know what the definition of the criteria are that were used to make the determinations that road construction and timber harvest qualify as prohibited acts. (Individual, Moses Lake, WA - #718.60000)

Public Concern: The Forest Service should implement Alternative 3 west of the 100th Meridian and Alternative 4 east of the 100th Meridian.

A consideration of another way of dealing with ecological differences might be to implement Alternative 3 west of the 100th meridian and Alternative 4 east of it. (Individual, Deer, AR - #44200.61300)

4.4.1 Alternative 1

Citing political and economic reasons, many respondents support the No Action Alternative. One Nevada resident believes any other alternative “would interfere with and hamper efforts by the Nevada Department of Wildlife to manage wildlife within the state.” Citing the fact that more study is needed, another individual proclaims that “many issues [are] already on the board that need to be addressed before this plan could be implemented with any amount of confidence and assurance that important components have not been overlooked.”

One recreational organization believes that Alternative 1 should be modified to initiate a viable program of land use education. Another respondent, asserting that Forest Service managers need flexibility in their decision making process, requests that the Forest Service adopt Alternative 1D.

Public Concern: The Forest Service should adopt the No Action Alternative.

I would request that no action be taken. It is not a good thing to designate any area as roadless. (Individual, Fountain Green, UT - #815.61100)

NO ACTION should be the preferred and selected alternative for this hair brain scheme by the Clinton Administration to create more de facto-spaghetti wilderness. (Individual, Troy, MT - #1294.61100)

Please select the “no action” alternative for this proposal. This roadless area proposal is a purely political move and should not be given the time of day. (Individual, Gainesville, GA - #2155.61100)

The natural resources such as TIMBER, GAS, OIL, COAL, MINING, GRAZING AND RECREATING CONTRIBUTE TO OUR STANDARD OF LIVING AND THE HEALTHY ECONOMIES OF OUR COMMUNITIES. We all pay dearly for the privilege to use the forest under the strictest environmental laws in the free world directed under “NEPA” where we all have input. As a result to ensure our country does not become dependent on foreign imports for our resources I support Prohibitive Alternative #1 and Procedural alternative “A”. (Individual, No Address - #2160.61100)

I support the no action alternative. We don’t need any more roadless areas set aside. There is more than enough wild and scenic, wilderness areas, special areas, monuments, parks etc. today. (Individual, Susanville, CA - #3585.61100)

MANAGE WILDLIFE WITHIN NEVADA

I suggest that the proposed alternatives, other than 1, A or T-1, would interfere with and hamper efforts by the Nevada Department of Wildlife to manage wildlife within the state and our various fire fighting districts to control seasonal fires at the community level. (Individual, Wellington, NV - #7563.62000)

MORE STUDY IS NEEDED.

I urge that the “no action alternative” be taken at the present time. More study is needed and there are many issues already on the board that need to be addressed before this plan could be implemented with any amount of confidence and assurance that important components have not been overlooked. (Individual, La Grande, OR - #7671.61100)

Public Concern: The Forest Service should adopt a modified version of Alternative 1.

I'm in favor of Alternative #1 with some modifications. Which are: No prohibitions on activities on our public land except where mandated by ecosystems, environmental concerns, or other local area special concerns. The land, forest and BLM lands, belong to the American people, the Government is just taking care of it for us. (Individual, No Address - #2416.64110)

I recommend choosing the no Action alternative (Alternative #1) with the following constraints: Accelerate the completion of planning under RARE 2 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)

LAND USE EDUCATION AND FUNDING

The "No Action" Alternative should be modified to initiate a viable program of land use education, partnering with public interest individuals and groups to enhance effective land management, and revamping the funding and resources available to the Forest Service. (Recreational Organization, Salt Lake City, UT - #15896.61100)

Public Concern: The Forest Service should adopt Alternative 1D.

I favor alt. 1 of the prohibition alts and alt. D in the procedural set. FS managers need flexibility in order to meet challenges to the health of the forests AND increasing demands for recreation, etc. (Individual, Missoula, MT - #7269.83000)

4.4.2 Alternative 2

Many respondents support the Preferred Alternative. However, others believe that the Forest Service should modify Alternative 2. Allowing off-highway vehicle (OHV) access, including recreational values, and protecting species are some of the concerns individuals suggest should be emphasized in the Preferred Alternative.

While some respondents express support for Alternative 2C and 2D, others feel that the Forest Service should not adopt Alternative 2. The Preferred Alternative does not protect unroaded areas, apart from the inventoried roadless areas, according to one citizen. "The problem is exacerbated by your choice of 'Procedural Alternative B,' which seems to grant unlimited discretion over the unprotected roadless areas exempted by 'Alt. 2' to local managers who are likely to be most susceptible to local pressures for desecration of all remaining roadless areas," this constituent asserts. While not advocating the abolition of the Preferred Alternative, some respondents question its scientific validity. These people request that the Forest Service cite studies that support Alternative 2.

Public Concern: The Forest Service should adopt the Preferred Alternative.

I support the Forest Service's roadless initiative and I would very much like to see the preferred alternatives (prohibition alternative #2, procedural alternative B, and Tongass National Forest alternative #T3) adopted into the final rule. (Individual, Ewen, MI - #1301.61200)

I think the current version of the National Forest Service Roadless Initiative represents a reasonable compromise. (Individual, Great Falls, MT - #1293.61200)

Public Concern: The Forest Service should modify its Preferred Alternative.

The proposed alternative in the Draft Environmental Impact Statement for protecting national forest roadless areas must be improved in two ways: It must provide IMMEDIATE AND COMPLETE protection for Alaska's Tongass National Forest and it must protect ALL national forest roadless areas, including Alaska's Tongass and Chugach, from logging, and other exploitation, as well as new roads. (Individual, Millersville, PA - #114.61300)

I am in agreement with the Prohibition and Procedural Alternatives being proposed (#2 and #B, respectively) conditional on the Rule delegating to local authority the decision(s) to build new roads into the subject roadless areas in cases of extenuating circumstances such as for public health and/or safety, environmental enhancement/health, etc. (Individual, Wenatchee, WA - #813.61300)

ALLOW OFF-HIGHWAY VEHICLE ACCESS

Please add language to the preferred alternative to include 'no net loss' of OHV access via trail or forest roads to these roadless areas. Also, please underscore that the land manager has the option and is encouraged to increase trail miles where appropriate to lessen impact on a per-square-mile basis. (Individual, Littleton, CO - #134.61300)

INCLUDE ALL RECREATIONAL VALUES

Please alter the language in the preferred alternatives to include all recreational values of the subject areas, including OHV, trail motorcycle, and mechanized vehicle access and recreational use. I have to assume from the well-done PowerPoint informational presentation that the USFS intends to preserve recreational values in roadless areas, including OHV and 4-wheel drive usage, but the language must be more explicit in preserving existing recreational values. It must allow land managers the highest flexibility to evaluate improvement and/or expansion of trails and forest roads. Land managers must be strongly encouraged to use more creative means to manage trails than 'closure' -- and to use closure only as a LAST resort, not the first one. (Individual, Littleton, CO - #134.91700)

PROTECT SPECIES

Through law we have determined that every species has a right to live. Please keep that in mind when you look at your preferred alternative for the Roadless Initiative, which would further endanger or even push to extinction many species, and please change the preferred alternative to do more to protect these species. (Environmental/Preservation Organization, No Address - #1826.83520)

Public Concern: The Forest Service should adopt Alternative 2C.

If all unroaded land acquired in recent land exchanges is included, Alternative 2 is the best alternative for roadless area protection, but only when combined with Procedural Alternative C. (Environmental/Preservation Organization, Bozeman, MT - #16097.61300)

Public Concern: The Forest Service should adopt Alternative 2D.

The Vermont Fish and Wildlife Department recommends that the U.S. Forest Service consider 2D as the most appropriate alternative to protect the roadless area values of both the inventoried and uninventoried areas. We appreciate the opportunity to offer these comments and hope that you will seriously consider them as a basis to improve and enhance the roadless area proposal. (State Agency, Waterbury, VT - #19299.61300)

Public Concern: The Forest Service should not adopt the Preferred Alternative.

Your “preferred alternative” #2B is totally unacceptable--but not surprising. You don’t seem to grasp the concept that our national forests are not your private tree farm. You need to understand that our national forests are a priceless asset not to be squandered. (Individual, Nashville, TN - #1153.61200)

I am writing to express my profound concern regarding the ‘Proposed Action and Preferred Alternatives’ included in your Draft Environmental Impact Statement on Roadless Area Conservation. My concern is, first and foremost, for your choice of ‘Alternative 2’ re Road Construction. Manifestly, this does NOT protect unroaded areas, apart from the inventoried roadless areas. The problem is exacerbated by your choice of ‘Procedural Alternative B,’ which seems to grant unlimited discretion over the unprotected roadless areas exempted by ‘Alt. 2’ to LOCAL managers who are likely to be most susceptible to local pressures for desecration of all remaining roadless areas. Although local managers are evidently to be admonished to ‘consider’ all relevant social and ecological issues, no principles are articulated which would actually structure decision making in such a way as to coherently and consistently defend the integrity of the areas in question. Finally, your choice of ‘Alternative T3’ regarding the Tongass is scandalous at best. What basis is there for treating the Tongass any differently from the rest of the land in Forest Service jurisdiction (other than strictly political considerations)? Again, decision-making is to be delegated to local authorities and hidden behind a mask of unstructured discretion. (Individual, Stelrekin, WA - #989.61200)

Public Concern: The Forest Service should cite studies which support the Preferred Alternative.

The quality of this DEIS reflects the rush in which it was prepared to satisfy political agendas. It lacks specific studies designed to provide useful and pertinent information to support the preferred proposal. (Recreation Organization, Salt Lake City, UT - #15896.60000)

4.4.3 Alternative 3

While several respondents support the adoption of Alternative 3, others believe that the Forest Service should adopt a modified version of Alternative 3. A moratorium on road building in the Tongass National Forest, fire prevention measures, and a public oversight process are some of the provisions people wish to see included in the alternative.

Other citizens express support for the implementation of Alternatives 3C, 3D, and 3DT4. One respondent who supports Alternative 3 also requests that the Forest Service clarify what activities will be allowed under this alternative.

Public Concern: The Forest Service should adopt Alternative 3.

These benefits can best be achieved by Prohibition Alternative 3. Prohibiting timber harvest except for stewardship purposes will maximize the benefits while not having much more of an economic impact than alternative 2 has. The inventoried roadless areas only represent 28% of the NFS lands. 72% is still available for timber harvest and road based recreation. Prohibiting new road construction and non-stewardship timber harvest will not be a large hardship. (Individual, Wheaton, IL - #156.64130)

My initial review of the alternatives was inclined towards recommending alternative #4. I think the goal should be the full establishment of natural fire regimes throughout the planning area. Initially I did not think that alternative #3 was best. My concerns with alternative #3 are related to the frequent practice in western national forests of proposing "Forest Health Treatment" which are thinly disguised timber harvests. I am skeptical that timber harvests in alternative #3 will truly be used only in cases where stewardship is needed. However after consideration, I am convinced by the DEIS arguments that the risk of catastrophic wildfires associated with Alternative #4 is not warranted. Therefore my preferred prohibition alternative is #3. Alternative #2 seems to rely on economic realities to limit logging in the unroaded areas. This may be effective, but I feel the definitive limits on timber harvest are found in Alternative #3. (Individual, Rowlett, TX - #954.64130)

Public Concern: The Forest Service should adopt a modified version of Alternative 3.

INCLUDE A MORATORIUM ON ROAD BUILDING IN THE TONGASS

In #3, I believe that there should be a moratorium on building roads in the roadless areas in the Tongass until the decision is made in 2004. (Individual, No Address - #467.61300)

INCLUDE FIRE PREVENTION MEASURES

I prefer Alternative 3 with some safeguards. Fire suppression has put many western forests at risk. I support stewardship in the form of fire prevention by thinning undergrowth IF there is a protocol for the maximum diameter of stems and trunks that will be removed. Also we need to limit the number of years when this kind of stewardship will be practiced. (Individual, Ashland, OR - #6905.64130)

INCLUDE A PUBLIC OVERSIGHT PROCESS

The modification that I would make to Alternative 3 would be to add an oversight process that is open to public scrutiny and incorporates the best ecological science to ensure that stewardship harvests do not become commodity harvests in disguise. (Individual, Portland, OR - #15333.64130)

Public Concern: The Forest Service should adopt Alternative 3C.

I believe that the proposed prohibition on roadbuilding and reconstruction is good but weak. I prefer alternative 3, permitting only stewardship timber harvest, and alternative C, project based evaluation. (Individual, Henderson, NV - #2384.61300)

Public Concern: The Forest Service should adopt Alternative 3D.

We support the roadless area conservation proposal and feel that Prohibition alternative 3 and Procedural Alternative D most closely fit our ideas of what roadless areas should be and what the procedure should be for planning at the forest level. (Business, Lander, WY - #4567.61300)

Public Concern: The Forest Service should adopt Alternative 3DT4.

For the Tongass option I support 3DT4 option. In regard to ORVs, I support 3D, allowing local forests to make decisions. (Individual, Duluth, MN - #2950.61300)

Public Concern: The Forest Service should clarify what activities will be allowed under Alternative 3.

The preferred alternative (#2 in the brochure) does not go far enough in protecting the forests as such. Timber harvest except for stewardship purposes must be eliminated. Thus alternative #3 is preferred (#4 is too extreme). Add to alternative #3 what will be and what won't be allowed. What low impact activities (such as hiking and cross-country skiing) will be allowed? The Tongass National Forest should be included in alternative #3 now. (Individual, Sunriver, OR - #1258.64130)

4.4.4 Alternative 4

Although many respondents exhort the Forest Service to adopt Alternative 4, these constituents include caveats to their support. In addition to the prohibition on road construction and timber harvest, many of these people would like to also see prohibitions on mining, grazing, OHVs, and commercial development. Others request clarification on Alternative 4's timber harvest prohibition; specifically, the harvest of "dead and down" trees. Several individuals support Alternatives 4A, 4B, and 4D as well.

Of those that support Alternative 4D, many insist that this alternative should be expanded to include all roadless areas in the United States. Similarly, one person supports the adoption of Alternative 4DT3 with the caveat that the Forest Service expands protection to include all uninventoried roadless areas. Others believe that the Forest Service should adopt Alternative 4DT4. One constituent requests that a modified version of Alternative 4DT4 be implemented, "without loopholes that would inevitably lead to the building of roads and their use for extractive or commercial activity."

Public Concern: The Forest Service should adopt Alternative 4.

I am writing to strongly encourage you to back alternative 4 as the best option to protect roadless areas in the national forests of this country. This is the only one of the alternatives which would provide immediate and lasting protection without loopholes, exemptions or waivers. (Individual, Los Angeles, CA - #480.64140)

I am writing in support of Alternative 4 of your proposed Roadless Policy. Only Alternative 4 acts to save our forests and, therefore, our air quality. Healthy forests are a necessity if we are to continue as a species for another seven generations. Other reasons for my support of alternative 4 include the facts that there are already 386,000 miles of national forest roads for which the Forest Service does not have the funds to maintain; logging affects watershed values and diminishes water quality; and logging in roadless areas ALWAYS loses money for taxpayers. (Individual, Columbia, CA - #912.64140)

PROHIBIT GRAZING

We prefer alternative 4 to prohibit road construction, reconstruction and all timber harvest in the unroaded areas. The elimination of grazing in roadless areas should be included. (Individual, San Diego, CA - #1147.61300)

PROHIBIT MINING, GRAZING, OFF-HIGHWAY VEHICLES, AND COMMERCIAL DEVELOPMENT

Alternative 4 is the best alternative listed, but it should also prohibit all future activities which are detrimental to the environment, including all logging, mining, grazing, ORV usage, and commercial development. Absolutely no future road-building or reconstruction should be allowed for any reason. (Individual, Richland, WA - #1006.61300)

Public Concern: The Forest Service should clarify whether Alternative 4 would allow harvest of “dead and down” trees.

Alternative 4 states that all tree cutting is prohibited except for personal use activities such as firewood gathering...Does this include “dead and down” trees? (Individual, Moses Lake, WA - #718.6400)

Public Concern: The Forest Service should adopt Alternative 4A.

There should be no new roads constructed or reconstructed in “roadless” areas and no procedures established for this non-action. JUST DON'T BUILD OR RECONSTRUCT ROADS IN ROADLESS AREAS. (Individual, Bridgeton, ME - #836.64140)

Public Concern: The Forest Service should adopt Alternative 4B.

I implore the Forest Service to adopt a modified alternative--4b which would prohibit roadbuilding and commercial logging in roadless areas. (Individual, Missoula, MT - #824.61300)

Public Concern: The Forest Service should adopt Alternative 4D.

A healthy final policy must halt logging, road building and similar destructive activities in ALL our national forests. Please reinforce alternatives 4 (including the Tongass National Forest) and D to prohibit all destructive activities in all roadless areas larger than 1,000 acres. Your recommendations carry a heavy burden of responsibility, yet the choice is clear. [At least] change your recommendation so that our forest lands will not only live but thrive. (Individual, No Address - #213.61310)

Public Concern: The Forest Service should adopt a modified version of Alternative 4D.

I urge you to adopt alternative 4D with the following modification: Allow no new road building in any unroaded area of any national forest. (Individual, Boulder, CO - #334.61310)

Count my vote FOR ALTERNATIVE 4D and for its expansion to cover ALL roadless areas of any size, and to protect wilderness proposed lands from road building until the NEPA is voted on. (Individual, Mundelein, IL - #1694.61300)

Also create a moratorium on destructive activities in unroaded areas pending local forest plan revisions. I support strengthened versions of alternative 4 (including the Tongass National Forest) and D to prohibit all destructive activities in all roadless areas larger than 1000 acres. (Individual, Burbank, CA - #398.61310)

Please issue a final policy that will provide lasting and immediate protection for all national forest roadless areas without loopholes, exemptions or waivers. The final policy should permanently halt logging, road building, OHV use and other destructive activities in all roadless areas in all national forests. This policy should also create a moratorium on logging, road building and other destructive activities in unroaded areas pending local forest plan revisions. As such, I support strengthened versions of alternative 4 (including the Tongass National Forest in Alaska) and D to prohibit all destructive activities in all roadless areas larger than 1000 acres. (Individual, La Jolla, CA - #673.61310)

I am writing concerning the Roadless Proposal DEIS and want it made clear that I am wholly in support of a modified version of Alternative 4D. While alternative 4D would prohibit road construction, reconstruction and all commercial logging within unroaded portions of inventoried roadless areas, I would like this alternative to be expanded to protect ALL inventoried and uninventoried roadless areas regardless of size (including those in Alaska's Tongass National Forest) and to additionally maintain the wilderness values of roadless lands proposed by Congress for wilderness designation, including roadless areas encompassed in the Northern Rockies Ecosystem Protection Act, H.R. 488, which now has 100 cosponsors. Also prohibited should be mining and motorized use in all roadless areas. (Individual, Hamilton, MT - #781.61310)

Public Concern: The Forest Service should adopt a modified version of Alternative 4DT3.

I strongly urge you to adopt a modified version of Alternative 4DT3. We must immediately fully protect all inventoried and uninventoried Roadless lands: protection must be made before forest plans are written. Include the Tongass National Forest. No ORV use. (Individual, Hamilton, MT - #7826.61300)

Public Concern: The Forest Service should adopt Alternative 4DT4.

I feel 4DT4 is a better alternative. Our Roadless Areas need to be protected from timber harvesting, ORV use, mining, gas and oil development to ensure their existence for future generations. (Individual, Bozeman, MT - #3597.61310)

Public Concern: The Forest Service should adopt a modified version of Alternative 4DT4.

As a biologist, I am very concerned that our last remaining roadless areas remain roadless. Their importance for watersheds, for native species, as connectivity corridors, and as areas for peaceful, low impact recreation make it imperative that we protect them completely, without loopholes that would inevitably lead to the building of roads and their use for extractive or commercial activity, and ORVs. THEREFORE I STRONGLY URGE YOU TO CHOOSE ALTERNATIVE 4-D-T4, WITH MODIFICATIONS TO PREVENT THE USES AND ABUSES MENTIONED ABOVE. (Individual, Ashland, OR - #8297.83000)

4.5 Procedural Alternatives

This section addresses comments regarding the procedural alternatives of the Draft EIS. How the proposed rule will be implemented elicits numerous comments from the public. Some respondents believe that the Draft EIS should list the actual procedures to be implemented.

“Without the actual procedures for the public to evaluate, the DEIS is incomplete and cannot be approved,” one person maintains. Similarly, a business representative expresses concern with the criteria to be used to designate future roadless areas. This individual believes the criteria are extremely vague and need to be clarified in future documents.

While acknowledging that project and planning level analysis must by their nature be done at the local forest level, one environmental organization believes that the proposed rule’s forest and project level planning procedures should reflect the need for consistency and provide parameters and standards to guide local decision makers. Another individual, also concerned with local level planning procedures, requests that the Forest Service ensure that local participation is not dominated by economics.

One State Elected Official contends that the Forest Service should more thoroughly analyze the Procedural Alternatives. He points out that the Draft EIS contains only three pages of analysis related to the Procedural Alternatives.

The section is divided into four subsections corresponding to the four procedural alternatives discussed in the Draft EIS. The Subsections are titled: 4.5.1, Alternative A; 4.5.2, Alternative B; 4.5.3, Alternative C and 4.5.4, Alternative D.

Public Concern: The Draft EIS should list the actual procedures to be implemented.

The DEIS states procedures are “established forms or methods.” Well, where are they? I have diligently searched the DEIS and can find no procedures. There is a bulleted list of topics to consider, but this is neither form nor method. The DEIS provides no hint as to how these items are to be weighted, how fundamental conflicts are to be resolved, etc., which is important. The DEIS covers actions by which the Procedural Alternatives are to be implemented, so the procedures to be enacted must be in it. Without the actual procedures for the public to evaluate, the DEIS is incomplete and cannot be approved. (Individual, Fort Collins, CO - #19429.64200)

Public Concern: The Forest Service should clarify the criteria to be used to designate future roadless areas.

The most alarming part of the proposal is the procedural alternatives section. It includes procedures to designate, as roadless, other forest lands that are currently not included in inventoried roadless areas. This proposal would allow any part of any forest, no matter how small, to be included in the roadless inventory. The criteria to be considered when determining these future roadless areas are extremely vague. This document offers no description of these lands. This vagueness is unacceptable. (Business, Lewiston, ID - #14715.63000)

The presence of past timber sales should not disqualify areas for Roadless Area designation. While this diminishes RA values at present, this will change over time. (Environmental/Preservation Organization, Lake City, FL - #28999.64420)

Public Concern: The proposed rule’s forest and project level planning procedures should reflect the need for consistency and provide parameters and standards to guide local decision makers.

The procedures governing the management of roadless areas at the project and forest plan level provide little or no guideline or parameter for decision makers and forest planners regarding the protection and future of roadless and unroaded areas. For example the DEIS states that “local managers would evaluate whether and how to protect roadless characteristics project by project” and “local officials” discretionary decisions would be informed by their evaluation of the quality and importance of the characteristics and determine whether these characteristics should be protected. While project and planning level analysis must by their nature be done at the local forest level, national forest roadless areas are a part of all Americans priceless and irreplaceable natural heritage. The roadless area conservation rule’s forest and project level planning procedures should reflect the need for consistency and provide parameters and/or standards to guide local decision makers. This is critically important. (Environmental/Preservation Organization, Cave Junction, OR - #16188.64200)

Public Concern: The Forest Service should ensure that under the procedural alternatives local participation is not dominated by economics.

Under procedural alternatives, please ensure that local participation isn’t dominated by economics. Let’s start leaving forest land in a forest condition. (Individual, Diamondville, WY - #1309.64200)

Public Concern: The Forest Service should more thoroughly analyze the Procedural Alternatives.

Second, the DEIS inadequately addresses the ‘procedural alternatives’. Over 300 pages in the DEIS are dedicated to the “prohibition alternatives”, but only three pages are spent on procedural alternatives. Yet, the overall impact of the procedural alternatives may well be greater than that of the prohibition alternatives particularly if the recent Road Management Strategy results in more unroaded areas subject to the procedural alternatives. (State Elected Official, Boise, ID - #13571.64200)

4.5.1 Alternative A

Citing the lack of an adequate range of alternatives, many respondents maintain that the Forest Service should adopt Alternative A.

Public Concern: The Forest Service should adopt Alternative A.

I ask you to develop and evaluate one or more alternatives that would allow multiple use road access in specific roadless areas threatened by insects, disease or fire. If the Forest Service will not prepare an additional alternative as mentioned above, the only alternative I can support is Alternative A—the No Action Alternative. (Individual, Missoula, MT - #50742.60000)

The only reasonable alternative, I feel, is Alternative A, “no action”. (Individual, Waukesha, WI - #17356.61100)

4.5.2 Alternative B

While some respondents support the implementation of Procedural Alternative B, others believe the Forest Service should not adopt this alternative. “Leaving the decision to local managers for ‘roadless’ areas outside of ‘inventoried roadless areas’ guarantees an inconsistent approach and the loss of many high value areas,” according to one person.

Citing a similar concern, one Montana resident supports Alternative B but expresses reservations about the level of authority invested in local managers, who are subject to local user group pressure.

Public Concern: The Forest Service should implement Procedural Alternative B.

I would prefer a rule that would direct local Forest Service managers to evaluate each roadless area whether and how to protect roadless characteristics and values in the context of multiple-use management during forest plan revisions. (Individual, McMinnville, OR - #3401.41240)

Public Concern: The Forest Service should not adopt Procedural Alternative B.

I am very disappointed in Part B of the proposal. Leaving the decision to local managers for “roadless” areas outside of “inventoried roadless areas” guarantees an inconsistent approach and the loss of many high value areas. There is an obvious need to identify important areas before decisions can be made. (Individual, Moscow, ID - #1782.64220)

Public Concern: Under Procedural Alternative B the Forest Service should limit the authority of local managers to protect roadless areas from local user group pressures.

On Procedural alternatives I support B, but would limit authority of local managers to protect roadless areas from local user group pressures. (Individual, Clinton, MT - #817.64220)

4.5.3 Alternative C

Many respondents believe that the Forest Service should evaluate new road proposals on a case-by-case basis. Therefore, they support Procedural Alternative C.

Public Concern: The Forest Service should implement Procedural Alternative C.

I...urge the Forest Service to prohibit all roads and other destructive activities in these last remaining stands, providing interim protection through project by project analysis. And I also urge that consideration include the Tongass National Forest in Alaska, the only largely intact rain forest left in the world’s temperate zones. (Individual, Concord, CA - #908.61300)

I am hesitant to endorse a blanket “no new roads policy,” as this might do more harm than good! I suggest sound forest resources management and evaluate new road proposals on a case-by-case basis, rather than rigid policies that may straight-jacket future actions. (Individual, Santa Barbara, CA - #314.64250)

4.5.4 Alternative D

“I am concerned that while the rule may be adopted, without an interim policy of project-by-project analysis the policy may not be implemented for years,” remarks one individual. Another person notes that a project-by-project analysis of projects in a transition to the forest plan process “provides the lowest risk of loss of roadless characteristics and values of all the alternatives.” For these reasons, these respondents support Procedural Alternative D.

Public Concern: The Forest Service should adopt Procedural Alternative D.

I am concerned that while the rule may be adopted, without an interim policy of project-by-project analysis the policy may not be implemented for years. Remember that Congress has delayed the revision of many Forest Plans for years. Additionally, a large-scale management plan via Forest Plan amendments is necessary to provide a consistent environment for plants and animals. Discontinuous and disrupted management of the unroaded areas could inhibit the recovery and sustainability of many endangered and threatened species. With these arguments in mind I recommend the selection of Alternative D. (Individual, Rowlett, TX - #954.64240)

I am appalled at the prospect of the government adopting policies for the roadless areas which do NOT provide for other areas not yet possessing roads to use a project-by-project analysis in a transition to the forest plan process. (Individual, Middletown, CT - #215.64240)

I support procedural alternative D because it provides the lowest risk of loss of roadless characteristics and values of all the alternatives. (Individual, Bozeman, MT - #8319.90200)

4.6 Tongass Alternatives

Exempting the Tongass National Forest from the proposed rule motivates many respondent’s comments. General concerns regarding the Tongass National Forest are analyzed in this section. Several respondents request that the Forest Service provide the scientific justification for excluding the Tongass National Forest from the proposed rule. “Excluding the Tongass would severely compromise the scientific legitimacy of any national policy on the protection of roadless areas in our national forest system,” ventures one person. On the contrary, others believe that “the decision to defer action on the Tongass National Forest is just.”

Many Alaska residents urge the Forest Service to protect the Tongass National Forest from the timber industry. Similarly, residents exhort the agency to prohibit road building in the Tongass National Forest. Conversely, others request that road construction be allowed in the Tongass to facilitate access to remote areas.

Agreeing with those who wish to preserve the Tongass National Forest, some respondents request that at least half of the inventoried roadless areas in the Tongass National Forest be protected from road construction and timber harvest. Others have more specific suggestions. One citizen suggests that the proposed rule include all Tongass National Forest inventoried roadless areas over 25,000 acres, especially those adjacent to wilderness areas and national parks. Also wishing to protect the Tongass, another respondent asks that the Forest Service impose a 50-year moratorium on activities in Tongass National Forest roadless areas.

Some respondents are dissatisfied and frustrated with the exemption of the Tongass from the proposed rule. They believe that the Forest Service should not wait four years to realize that there are sufficient roads to meet timber, recreational and subsistence access needs in the Tongass National Forest. Citing the fact that Alaska was bought with the tax money of all Americans, one Alaskan asks that the Forest Service treat the Tongass National Forest as an equal share of America's National Forest legacy and not as a special case. Yet another individual believes that the Tongass should be considered a North American Natural Heritage Area. However, other Alaskans, unconcerned with the Tongass National Forest's exemption, feel that the Forest Service should implement and evaluate the Tongass Land Management Plan.

Public concerns specifically addressing the Tongass Alternatives can be found in the subsections immediately following this section; Subsections are titled: 4.6.1, Alternative T1; 4.6.2, Alternative T2; 4.6.3, Alternative T3; and 4.6.4, Alternative T4.

Public Concern: The Forest Service should provide the scientific basis for excluding the Tongass National Forest from the proposed rule.

There is no scientific basis to exclude roadless areas of the Tongass National Forest from the proposed protections. Excluding the Tongass would severely compromise the scientific legitimacy of any national policy on the protection of roadless areas in our national forest system. (Individual, Millersville, PA - #114.64330)

Public Concern: The Forest Service should defer action on the Tongass National Forest.

The Tongass National Forest is a very valuable piece of real estate, both with regards to the natural environment and to timber. This forest has been subject to abuses in the past, and some claim that these abuses are continuing in defiance of recent legislation. Most of the roadless areas should be closed to road building, but there should be a significant amount still left for environmentally-sensible timber harvesting. The web site indicates that most of the roadless areas (76%) in Tongass are now closed to road building, which is much higher than in most national forests. Although a lot of these areas are rock and ice, it appears that at least half are in forest. Only 10% of Tongass has been developed with roads, compared to 30-70% of other national forests in the West, and 40% is wilderness, more than any other national forest as far as I am aware. Therefore, the decision to defer action on the Tongass National Forest is justified. (Individual, Providence, UT - #4016.64330)

Public Concern: The proposed rule should protect the Tongass National Forest from the timber industry.

Do not cave in to pressure from our states dinosaur Congressional delegation. They would like to be back in the heyday of the Tongass timber program when the government worked for the industry. Times have changed. Please do not give away our last remnant of the western temperate rainforest to a minority industry. (Individual, Haines, AK - #7626.41300)

Public Concern: The Forest Service should prohibit road building on the Tongass National Forest.

I feel that because there are already 4650 miles & 13 million board feet of logging roads in the Tongass, that creates adequate road access to timber. (Individual, Juneau, AK - #6816.71300)

There are sufficient roads in the Tongass to meet any realistic timber needs. There are sufficient roads to meet any recreational or subsistence needs. But there is no need to wait for four more years to recognize these facts. (Individual, Tenakee Springs, AK - #8123.71300)

Public Concern: The Forest Service should allow road construction on the Tongass National Forest.

I am in full support of keeping and allowing construction of new roads on the Tongass National Forest lands. These roads have allowed my family and friends access to remote areas that would otherwise be of great difficulty reaching. (Individual, Sitka, AK - #2146.71300)

Public Concern: The Forest Service should protect at least half of the inventoried roadless areas in the Tongass National Forest.

A target should be set as to how much of the Tongass' Inventoried Roadless Areas will be protected. I feel that at least half should receive long term protection based on the configuration of existing protected areas and other conservation biology concepts. (Individual, Leavenworth, WA - #15897.64355)

Public Concern: The Forest Service should include all inventoried roadless areas over 25,000 acres and adjacent to wilderness areas in the Tongass National Forest.

The largest blocks [(>25,000 acres)] [of the Tongass IRA's] should receive certain protection in any case, especially when adjacent to existing wilderness or National Park lands. (Individual, Leavenworth, WA - #15897.71120)

Public Concern: The Forest Service should consider a 50 year moratorium on activities in roadless areas of the Tongass National Forest.

It is my professional opinion as an engineer/forester that a 50 year moratorium be effected on the Tongass National Forest that restrict further incursion into the remaining "roadless areas" or, until such time that industry gears up for and begins the harvest of the emerging second growth on previously logged lands. This second growth is approximately 50 years old or less and far from millable size. (Individual, Sitka, AK - #11389.10100)

Public Concern: The Forest Service should not wait four years to realize that there are sufficient roads to meet timber, recreational and subsistence access needs in the Tongass National Forest.

There are sufficient roads in the Tongass to meet any realistic timber needs. There are sufficient roads to meet any recreational or subsistence needs. But there is no need to wait for four more years to recognize these facts. (Individual, Juneau, AK - #6816.71300)

Do not delay in including the Tongass National Forest in your Roadless Area Protection. About two thirds of the total projected timber harvest planned in the Tongass over the next five years is projected to come from inventoried roadless areas. This is directly counter to the mission of protecting the few remaining roadless areas we have left. (Environmental/Preservation Organization, Oak Ridge, TN - #18498.64351)

Public Concern: The Forest Service should treat the Tongass National Forest as an equal share of America's National Forest legacy.

As an Alaska state resident, I am extremely disturbed by the threats of cutting agency funding that our Congressional delegation promises to impose should policy not go their way. What our delegation fails to grasp is that Alaska was bought and paid for by the American taxpayers. Their time will pass, but your actions have a direct and lasting affect on the health and management of our National Forests. The Tongass should be treated as an equal share of America's National Forest legacy and not as a special case. (Individual, Juneau, AK - #6117.93620)

Public Concern: The Tongass should be considered a North American Natural Heritage Area.

[The Tongass] should be considered as a NORTH AMERICAN NATURAL HERITAGE AREA. (Individual, Santa Clara, CA - #550.64410)

Public Concern: The Forest Service should implement and evaluate the Tongass Land Management Plan.

The Forest Service issued the FEIS for the Tongass Land Management Plan in 1997. The ink was barely dry on the document when environmental groups began clamoring to amend the plan. One of the plan amendments is this roadless proposal. In 1997 TLMP represented the best use and allocation of the Tongass National Forest resources. I am in favor of implementing TLMP, and then evaluating the effects of implementation on the forest. (Individual, Ketchikan, AK - #6655.72230)

4.6.1 Alternative T1

Economic hardship, brought about by the withdrawal of land from timber harvest, is the reason most often cited by those who support the adoption of Alternative T1. Special legislation directed at the Tongass National Forest is also cited. "A considerable amount of the Tongass National Forest was given special designation by past legislation and executive orders," one respondent indicates. "Enough is enough."

Public Concern: The Forest Service should adopt Alternative T1.

Alternative T1 is the most logical and is favored. A considerable amount of the Tongass National Forest was given special designation by past legislation and executive orders. Enough is enough. Let uses be determined by the current land use plan and future revisions thereto without a total new plan. Good decisions have been made. Stay with them in spite of preservationist displeasure. (Individual, Pueblo, CO - #2884.64310)

There is room for industry and for wilderness on the Tongass. Since 1995, Ketchikan has lost 1,000 jobs as a direct or indirect result of the mill closure--brought about by the withdrawal of land for logging. The impact is devastating

on this once bustling community. School enrollment has dropped, resulting in less money for education. The low-paying tourism jobs cannot replace those lost, and the constant influx of visitors takes its toll on our infrastructure. The negative economic ripple is felt by all the businesses in town--doctors, lawyers, realtors, floatplane operators, drug stores, grocery stores, clothing stores, insurance companies, restaurants. This list goes on and on. I do not believe the law (TTRA, ANILCA & TLMP) or science justify or support extending the roadless ban to the Tongass. But this isn't about justice. This is about people who want to "save" Alaska and transform it into the First Park. The reason the environmentalists are so successful is not because the law or science is on their side, it's because as Donald Ross of the Rockefeller Family Fund said in "Tongass: Pulp Politics and the Fight for the Alaska Rain Forest" (page 172): "It doesn't take much, when you're a congressman from Kansas and you've never heard of the Tongass, to get you to vote for trees." Don't be like the congressman from Kansas. (Individual, Ketchikan, AK - #6972.90000)

4.6.2. Alternative T2

While some respondents support the implementation of Alternative T2, none of them state their reasons for such a decision, much to the chagrin of Forest Service analysts.

Public Concern: The Forest Service should adopt Alternative T2.

With regards to the Tongass National Forest in Alaska, I would choose T2. (Individual, Duluth, MN - #3214.64320)

4.6.3 Alternative T3

Believing that Alternative T3 is "too big a compromise," some respondents ask that the Forest Service not adopt this alternative.

Public Concern: The Forest Service should not adopt Alternative T3.

Option T-3 is too big a compromise. (Individual, Pueblo, CO - #605.64330)

Alternative T3 is not acceptable. (Individual, Richland, WA - #1006.64330)

4.6.4 Alternative T4

The reasons people offer for championing the implementation of Alternative T4 are as varied as the respondents themselves. One political organization representative believes that the extensive national public process afforded the proposed rule should be made available to the Tongass National Forest. "On issues of this magnitude," writes this representative, "all Americans deserve the ability to comment on all their public lands."

"All of southeast Alaska is extensively 'roaded' by the inland waterways," offers one Alaskan. "Roads are an expensive and destructive redundancy that reflects poorly on USDA management and science." Professing that there have been no studies that demonstrate a demand for more

roaded recreation, an Alaskan business representative also questions the need for more roads in the Tongass.

Numerous proponents of Alternative T4 express concern with the level of local control afforded Tongass National Forest managers. “Even if Tongass decision-makers have the inclination to protect roadless areas,” one respondent remarks, “they may be unable to do so in the social, economic, and political climate in which they live and work.”

The protection of wildlife habitat is often cited as a reason for the adoption of Alternative T4. “Wild salmon, brown bears, wolves, eagles and many other creatures depend upon a healthy intact habitat for survival,” attests one respondent. Taking this argument one step further, another individual declares that “we do not have the right to be destroying irreplaceable habitat nor do we have the right to interfere with the evolutionary process. The Tongass may be the last place on earth where species, thousands and thousands of plants and animals, are allowed to evolve without human interference.”

Although one respondent does not specifically support Alternative T4, this individual does request that the Forest Service phase out logging and road building in the Tongass National Forest within ten years.

Public Concern: The Forest Service should adopt Alternative T4.

T4 looks like the most immediate and thus the most productive. The forest needs this protection now, why wait for four years? Without intervention things are not going to improve on their own and who knows what could happen within the four years to the forest. (Individual, No Address - #328.64340)

The Tongass alternative should be T4; we need to bring this forest in line with all the other forests in the West. (Individual, Colorado Springs, CO - #854.64340)

The extensive national public process afforded this rule making must be available to the Tongass, rather than the local, public process planned under Alternative T3 when the 5-year Tongass Land and Resource Management Plan is reviewed. On issues of this magnitude, all Americans deserve the ability to comment on all their public lands. (Civic Organization, Missoula, MT - #10757.41500)

I want to strongly support the USFS proposal that would prohibit new road construction or reconstruction in unroaded portions of inventoried roadless areas. I also wish to recommend the adoption of these same management restrictions on the Tongass National Forest when its 5-year plan is proposed. (Individual, Vernal, UT - #1561.61200)

INLAND WATERWAYS

All of southeast Alaska is extensively “roaded” by the inland waterways. Roads are an expensive and destructive redundancy that reflects poorly on USDA management and science. (Individual, Tenakee Springs, AK - #11371.71300)

RECREATION

In addition to the backlog of Tongass roads that need repair, I fail to see any demand for more roaded recreation given the over 4500 miles on the Tongass, enough to span the width of the United States 1½ times. In fact, there

have been no studies that demonstrate a demand for more roaded recreation. (Business, Petersburg, AK - #11406.10212)

LOCAL DECISION-MAKERS

Decision-makers for the Tongass National Forest are infamous in their resistance to strong protection for roadless areas. This hostility to roadless area protection is evidenced by the forest plan revision for the Tongass, which selfishly recommends no additional wilderness for any of its 9.4 million acres of roadless lands. Even if Tongass decision-makers have the inclination to protect roadless areas, they may be unable to do so in the social, economic and political climate, in which they live and work. If roadless areas are to be protected in the Tongass, local decision-makers should be insulated from the fallout of that decision and so the decision should be made NOW, at the national level, along with every other national forest. (Individual, Seattle, WA - #10687.41000)

I am skeptical of the [Forest] Service's rationale in postponing decisions regarding smaller roadless areas and the entire Tongass National Forest and in putting these decisions into often-hostile local hands. (Individual, Seattle, WA - #10687.42000)

WILDLIFE HABITAT

Wild salmon, brown bears, wolves, eagles and many other creatures depend upon a healthy intact habitat for survival. The current proposal fails to ensure anything will ever happen to protect the Tongass and its majestic wildlife-2004 is too late! (Individual, Anchorage, AK - #5401.83500)

Keep what wild habitat remains on Mitkof Island and other islands in the Southeast Alaska intact. (Individual, Petersburg, AK - #11822.83500)

The Forest Service should address the effects of habitat fragmentation and development on the brown/grizzly bear. (Individual, Anchorage, AK - #11350.83500)

These roadless reserves are especially critical because only four percent of the Tongass land base encompasses the low elevation, large old growth most important to fish and wildlife and much of this rare forest has already been clearcut. (Individual, Missoula, MT - #10034.83610)

EVOLUTION

We do not have the right to be destroying irreplaceable habitat nor do we have the right to interfere with the evolutionary process. The Tongass may be the last place on earth where species, thousands and thousands of plants and animals are allowed to evolve without human interference. Protect the Tongass NOW. (Individual, Chopper Hill, VA - #9476.83500)

Public Concern: The Forest Service should phase out timber harvesting and road building in the Tongass National Forest within ten years.

Logging and roadbuilding should be phased out to zero within 10 years in the Tongass. (Individual, Helena, MT - #9126.61300)

4.7 Alternatives Considered but Eliminated

Page 2-20 of the Draft EIS states: "Alternative duration options were not considered as fulfilling the purpose and need for the long-term protection of roadless areas. . . . the effects of any temporary prohibition alternative would result in little difference, in the short-term, from the effects of the proposed Road Management Rule and would be duplicative." Nonetheless, many

respondents request that the Forest Service cease all proposed or planned logging operations in roadless and unroaded areas pending revision of forest plans. Similarly, others ask that the Forest Service halt any currently planned road construction projects in roadless areas until a final decision is made. Conversely, some individuals believe that the Forest Service should continue current plans for logging, road construction, and trail building until new forest plans are adopted.

Public Concern: The Forest Service should cease all proposed or planned timber harvest operations in roadless and unroaded areas pending revision of forest plans.

I...urge you to cease all planned or to-be-planned logging operations in roadless and unroaded areas until a revised forest plan is decided. (Individual, Eugene, OR - #545.64251)

Public Concern: The Forest Service should not proceed with any currently planned road construction projects in roadless areas until the final decision is made.

I do not know the time line of the decision making process but would hope that currently planned road construction projects in all the roadless areas not proceed until the final decision is made. It would be a shame if de facto reduction of the areas currently unroaded occurred while the decision making process was ongoing. (Individual, Olympia, WA - #1649.72200)

Public Concern: The Forest Service should continue current plans for timber harvest, road construction, and trail building until new forest plans are adopted.

The Sierra Club is requesting a moratorium on logging and roadbuilding in uninventoried, unroaded areas pending local forest plan revision. This is absolutely ridiculous. A moratorium will effectively support their long-term goals at the expense of the loggers' livelihood and forest access for other recreational users. This is hardly a fair solution to all forest users. This is just as silly a request, as it would be if the OHV users and loggers asked the Forest Service to remove all usage and access restrictions until the forest plan is revised. Current logging agreements and current road building and trail building plans, as well as future plans under today's requirements should continue until a new forest plan is adopted. (Recreational Organization, New Kensington, PA - #2253.64252)

4.8 Additional Areas to be Included in the Proposed Rule

Many proponents of the proposed rule suggest additional areas and designations they believe should be included in the proposed rule. At the bare minimum, some respondents maintain that the Final EIS should include all the roadless areas that were contained in the Draft EIS. Citing the Northern Plains Grasslands Management Plans Revision, one conservation organization exhorts the Forest Service not to eliminate any inventoried roadless areas on the National Grasslands. In addition to grasslands, the Forest Service should include Wilderness Study Areas in roadless area inventories, according to another environmental group.

The exclusion of uninventoried roadless areas elicits many responses from the public. The reasons people offer for protecting uninventoried roadless areas are numerous and varied.

Because many uninventoried roadless areas are adjacent to inventoried roadless areas and wilderness areas, it is important that they be afforded the same protections as inventoried lands, one individual advances. Uninventoried roadless areas provide the same values as inventoried areas and therefore should be included in the proposed rule, according to some.

Other proponents of uninventoried roadless area inclusion suggest that the Forest Service “mandate follow-up planning that identifies and protects uninventoried roadless areas and permanently ends damage to both inventoried and uninventoried areas from mining, off-road motorized vehicles, and other harmful activities.” Still others wish to expand the proposed rule to include the roaded areas identified as part of the national forest roadless areas.

The Forest Service should designate roadless areas based on their biological value, not on their roaded status, according to numerous individuals. Of these respondents, some request that the Forest Service protect all biologically significant areas, regardless of their size. The size of a biologically significant roadless area is of no consequence if endangered species are involved, according to others. “Many disappearing species are confined to forest habitats much smaller than 5,000 acres, some to less than 1,000 acres,” ventures one such person. “We need a better Roadless Area Conservation Rule to protect these rare species from abuse and possible extinction.”

The reader should note that comments regarding the inclusion of specific geographic areas are contained in Appendix B. Comments regarding the size limitations are found in Subsection 4.8.1, Size Limitations of Roadless Areas.

Public Concern: The Final EIS should include all roadless areas that were included in the Draft EIS.

In addition, staff members from the Buffalo Gap National Grasslands have indicated that the Forest intends to drop all of the user-identified roadless areas from the draft EIS for the Northern Plains Grasslands Management Plans Revisions in the Final RAC EIS. These areas were distinguished from the agency-identified areas only by internal fencing claims. Such claims are not relevant to the current Roadless Area Conservation rulemaking, and should not be used to eliminate any inventoried roadless areas on the National Grasslands on the Northern Plains. All roadless areas included in the draft Roadless Area Conservation EIS must also be included in the Final EIS. (Environmental/Preservation Organization, Rapid City, SD - #10681.41200)

Public Concern: The Forest Service should include Wilderness Study Areas in roadless area inventories.

Therefore, failing to include WSAs in the roadless area inventories will leave these areas vulnerable to roading and other destructive activities should they lose their status and be “released” by Congress. The Forest Service must clarify in the final rule whether or not these areas are included within the inventory. API recommends that these pristine areas be afforded the same prohibition and procedural protections for unroaded inventoried roadless areas. (Environmental/Preservation Organization, Sacramento, CA - #15906.64411)

Public Concern: The Forest Service should protect all remaining uninventoried roadless areas.

Protect immediately all remaining roadless areas, including non-inventoried areas and areas of 500 to 5,000 acres. Uninventoried areas must be included because so much land has been acquired since the inventory was done about 20 years ago. (Individual, Cumberland, MD - #3564.60000)

Because many uninventoried roadless areas are adjacent to inventoried roadless areas and wilderness areas, it is important that they be afforded the same protections. (Individual, Helena, MT - #1303.64150)

The policy should further include areas that in the past have not been inventoried as roadless. Illinois has only one plot of national forest over 5000 acres (Burke Branch). There are two more forests that are classified as Wilderness: Camp Hutchins and Ripple Hollow. There are also many small plots with wilderness terrain that are attached to these forests. (Individual, Chicago, IL - #3296.64421)

UNINVENTORIED ROADLESS AREAS PROVIDE THE SAME VALUES AS INVENTORIED AREAS

The uninventoried roadless forest areas are not considered in the DEIS but should be included and protected through the forest planning process as they provide the same values as the inventoried areas. (Environmental/Preservation Organization, Pensacola, FL - #15041.71110)

MANDATE FOLLOW-UP PLANNING

Mandate follow-up planning that identifies and protects uninventoried roadless areas and permanently end damage to both inventoried and uninventoried areas from mining, off-road motorized vehicles, and other harmful activities. (Individual, No Address - #301.64150)

Follow-up planning should be mandated to protect all uninventoried roadless areas from mining, logging, off-road vehicles, and ski developments. (Individual, Philomath, OR - #767.64250)

Public Concern: The Forest Service should include the roaded areas identified as part of the national forest roadless areas in the proposed rule.

The rule should include all of the inventoried roadless areas, which would also ban ADDITIONAL road building in those portions of the inventoried roadless areas that have been roaded (yellow in the power point presentation). If the roaded portions are still identified as part of the roadless area on national forests, then they ought to be included in the proposed rule for no more road building. It makes sense to include them and either ban additional road building in those areas, or make an effort to reduce the number of roads in those areas, because they are in a designated roadless area. If they are not included in the proposed rule and are considered roaded, then perhaps they should be removed from the areas being identified as inventoried ROADLESS areas. (Individual, Prairie City, OR - #953.64150)

Public Concern: The Forest Service should designate roadless areas based on their biological value, not on their roaded status.

Ideally, the FS should choose its designated roadless areas based on their biological value, and not based solely on what is currently left without any existing road. These decisions should have been made years ago by the FS and Congress, but I realize the political nature of this issue. It would be nice, however, if all areas for roadless designation were chosen because of the non-timber values within the specific roadless areas. (Individual, Coeur D'Alene, ID - #2121.64420)

PROTECT BIOLOGICALLY SIGNIFICANT AREAS OF ANY SIZE

End all logging and destructive practices in roadless areas of 1000 acres or more and in smaller areas of special biological importance. (Individual, Rockville, MD - #1021.64400)

Such [protective] measures should apply at a minimum to (1) all roadless lands that are 1000 acres in size and adjacent to other unroaded areas of 5000 acres or more, and (2) any roadless areas with special ecological significance. (Individual, Atlanta, GA - #117.64420)

I believe the 5000 acre designation is the only practical option at this time and so I support this option. However, 5000 acres is not a scientific decision or even a rational decision. It is based on studies performed in the past for a different purpose. Its use here is one of convenience. I would like to see scientific data on what size is the optimum size from a habitat preservation point of view. It is my contention that different environments will require different size allocations to make optimal habitat preservation. In desert regions 5000 acres may be insufficient to make a difference and in coastal marsh 10 acres may be significant. It would be best to designate roadless areas based on the needs of the environment and not an arbitrary designation. (Individual, Albuquerque, NM - #5771.64423)

PROTECT SPECIES FROM EXTINCTION

Many disappearing species are confined to forest habitats much smaller than 5,000 acres, some to less than 1,000 acres. Roads through these habitat areas can lead to species' extinctions. In Southern Arizona we enjoy the 1.7-million-acre Coronado National Forest, a unique managed area of 13 "sky island" mountain ranges. The Coronado is home to more than 140 animals and plants already classified as sensitive, threatened or endangered. We need a better Roadless Area Conservation Rule to protect these rare species from abuse and possible extinction. (Individual, Tucson, AZ - #9915.83520)

4.8.1 Size Limitations on Roadless Areas

Page 2-19 of the Draft EIS states: "Although alternative size criteria were suggested . . . the size of a roadless area is not necessarily related to how it functions in conserving the characteristics associated with roadless areas. . . . The appropriate size of a roadless area necessary for protecting roadless values is greatly dependent on its context or relationship to lands surrounding it. Therefore, minimum or maximum size criteria were not deemed appropriate as components of the procedural alternatives." Nonetheless, a plethora of respondents assert that the Forest Service should protect all roadless areas regardless of size. "The burden of proof should be on those contending that roads should be allowed in those smaller areas," according to one such person.

A surfeit of alternative size requirements for roadless area inclusion is offered by the public. According to numerous respondents, the Forest Service should protect all roadless areas of the following sizes: 10 acres, 50 acres, 160 acres, 200 acres, 300 acres, 400 acres, 500 acres, 639 acres, 640 acres, 1000 acres, and 2000 acres. "The 5000 acre [requirement] is a ridiculously high cut-off point and would exclude millions of acres of unroaded forest lands from permanent protection," one citizen attests.

Other respondents link the size requirement of roadless areas with geographic location. One such individual, noting the dearth of large roadless areas in the eastern United States, suggests that the Forest Service include all roadless areas larger than 1000 acres east of the Mississippi River. Citing similar reasons, another respondent requests that the Forest Service protect all roadless areas larger than 2500 acres in the eastern United States.

The designation of lands juxtaposed to current roadless areas should be taken into consideration when deciding which areas to include in the proposed rule, according to other constituents. The Forest Service should “extend the initiative to roadless areas of 1000 acres or more that are within 10 miles of another roadless area or a national park,” contends an individual.

The Forest Service should justify its choice of 5000 acres as the minimum size for roadless areas, according to many people. “The Forest Service arbitrarily chose the 5000 acres figure and with this decision eliminated most RAs [roadless areas] or potential RAs from the east,” claims one environmental group. Citing concerns similar to aforementioned public concerns, another respondent decries the 5000-acre size requirement as biased against eastern forests. “Our remaining roadless areas deserve protection and are just as important--if not more so because of their rarity--than the larger areas in western states,” espouses one Vermont resident. “Please revise your plan to protect our eastern roadless areas.”

Public Concern: The Forest Service should protect all roadless areas regardless of size.

All roadless areas regardless of size should be included in the proposal. (Individual, Missoula, MT - #831.64423)

Every acre of inventoried roadless land should be included in the policy. The proposal only includes 1.1 million acres even though there are nearly 1.5 million acres of previously inventoried forest lands that remain unprotected. (Individual, Flagstaff, AZ - #633.64423)

Please be sure to include every acre of inventoried roadless land in the protection policy, not just those acres deemed by someone involved in drafting the policy to be “more important” than other inventoried areas. (Individual, No Address - #2426.64423)

I would like to suggest a change in the local planning process that’s recommended in the environmental impact statement, so that areas between 1,000 and 5,000 acres are planned for, based on a premise that they should remain roadless. The burden of proof should be on those contending that roads should be allowed in those smaller areas. (Individual, Olympia, WA - #21119.61300)

Public Concern: The Forest Service should protect all roadless areas of 10 acres or more.

There should be NO ROADS in all roadless areas of 10 ACRES or more--not just the large roadless areas. (Individual, Albuquerque, NM - #13709.10110)

Public Concern: The Forest Service should protect all roadless areas larger than 50 acres.

I’m asking you to adopt the alternative that protects all roadless areas of 50 acres or more in all National Forests and BLM lands, whether or not the Forest Service and BLM have inventory data for them or not. (Individual, Grants Pass, OR - #6061.64420)

Public Concern: The Forest Service should protect all roadless and unroaded areas larger than 160 acres.

I urge that all inventoried roadless areas and other unroaded areas of 160 acres and larger located on the National Forest System be fully preserved as roadless areas. (Individual, Minneapolis, MN - #22.61300)

Public Concern: The Forest Service should protect all roadless and unroaded areas larger than 200 acres.

Please include roadless areas of less than 5,000 acres and end road building in areas 200 acres and larger. (Individual, Dallas, TX - #8100.61310)

Protect all individual unroaded areas 200 acres or larger and all unroaded areas 150 acres or larger that are adjacent to Wilderness Areas. (Individual, No Address - #2481.64150)

Public Concern: The Forest Service should protect all unroaded areas larger than 300 acres.

The Draft EIS should include all existing unroaded areas down to 300 acres in size. The 5000 acre (7.8 square miles) is a ridiculously high cut-off point and would exclude millions of acres of unroaded forest lands from permanent protection. (Individual, Richland, WA - #1006.64423)

Public Concern: The Forest Service should protect all roadless areas larger than 400 acres.

I would like the best protection for these areas. I encourage you to expand the roadless area conservation program. The final policy should protect all roadless areas of at least 400 acres. No exemptions should be made to this rule. ALL national forests should be included. (Individual, Eugene, OR - #762.61300)

Public Concern: The Forest Service should protect all roadless areas larger than 500 acres.

Include all national forest roadless areas larger than 500 acres. (Individual, Point Arena, CA - #518.10110)

Public Concern: The Forest Service should protect all roadless areas larger than 639 acres.

Include all National Forest roadless areas greater than 639 acres and seek out uninventoried roadless areas that have been missed during project planning activities. (Environmental/Preservation Organization, Chico, CA - #15065.64423)

Public Concern: The Forest Service should protect all roadless areas larger than 640 acres.

I urge you to prohibit road construction, reconstruction, off-road vehicle use, and commercial activities such as mining or oil and gas development on all remaining contiguous roadless areas or roadless tracts greater than 640 acres on all our National Forest System lands. (Individual, Cody, WY - #9386.64423)

Public Concern: The Forest Service should protect all inventoried and uninventoried roadless areas larger than 1000 acres.

I urge you to adopt an alternative that protects all roadless areas of at least 1000 acres in all national forests, whether the Forest Service currently has inventory data for them or not. (Individual, No Address - #301.64423)

Public Concern: The Forest Service should protect all roadless areas larger than 2000 acres.

“Based on my experience working for ten years on salmon recovery projects in Whatcom County, I am convinced that the 5000 acre threshold in the Roadless plan is inadequate. 2000 acres would be more appropriate, as would much tighter performance standards. (Individual, Bellingham, WA - #9694.10100)

Public Concern: The Forest Service should protect all roadless areas larger than 1000 acres east of the Mississippi River.

There are very few 5000-acre roadless areas in eastern forests, so set the criteria at 1000 acres east of the Mississippi River. (Individual, Westminster, SC - #7830.64423)

Public Concern: The Forest Service should protect all roadless areas larger than 2500 acres in the eastern United States.

The 5000 acre minimum is not appropriate for the east, like Vermont. This minimum should be reduced to at least 2500 acres. This would still allow a degree of isolation, but would allow more favorable lands to be entered in the roadless planning. (Individual, Bristol, VT - #14397.64351)

Public Concern: The Forest Service should protect all roadless areas of 1000 acres or more that are within 10 miles of another roadless area or a national park.

I would recommend that the Forest Service should also prohibit all motorized traffic in these areas and also extend the initiative to roadless areas of 1000 acres or more that are within 10 miles of another roadless area or a national park. (Individual, Lakeside, MT - #10239.64423)

Public Concern: The Forest Service should justify its choice of 5000 acres as the minimum size for roadless areas.

On page S-4 (and wherever else it is found in these documents), the phrase “...but are most often less than 5000 acres in size and were therefore not inventoried” is stated. The Forest Service is taking Wilderness methodology and distorting it. The Wilderness Act talks about RAs that can be less than 5000 acres if they can be managed

properly. The Forest Service arbitrarily chose the 5000 acres figure and with this decision eliminated most RAs or potential RAs from the east and from TNF. This is a biased way of conducting this analysis. We object to this unfair and arbitrary way of conducting business. (Environmental/Preservation Organization, Bellaire, TX - #13951.64423)

EASTERN FORESTS

Your protection plan for roadless areas has a gaping hole in it for eastern forests because it does not protect roadless areas of less than 5000 acres. Our remaining roadless areas deserve protection and are just as important--if not more so because of their rarity--than the larger areas in western states. Please revise your plan to protect our eastern roadless areas. (Individual, Burlington, VT - #3425.64423)

4.9 Exemptions

Many respondents discuss whether the proposed rule should contain exemptions and provisions to allow certain activities. Such concerns of a general nature are analyzed forthwith. However, comments regarding the exclusion of specific geographic areas are captured in Appendix B. Comments regarding specific activities to be exempted or prohibited are analyzed in more detail in Chapter 6.

Numerous respondents suggest establishing a rule without loopholes and including language that minimizes “other exemptions” in the alternatives. Conversely, other constituents believe that the proposed rule should allow for exemptions and waivers.

Public Concern: The Forest Service should preserve ecosystems by establishing laws without loopholes.

Preserve ecosystems by making laws without loopholes that do what they sound like they’re intended to do. (Individual, Albuquerque, NM - #5803.83000)

Public Concern: The Forest Service should include language that minimizes “other exemptions” in the alternatives.

Roads excepted-Alternative 4 (or 2 or 3) would allow some roads to be built-an estimated 368 miles for public health and safety, outstanding rights such as access to private property, and “other exceptions.” Please include language to narrow these exceptions, minimize the miles of road built, and avoid abuse of what might otherwise become a loophole. (Individual, Idaho Falls, ID -#9815.10100)

Public Concern: The proposed rule should allow exemptions and waivers.

I urge you to issue a final policy that provides for exemptions or waivers. (Individual, Great Falls, MT - #4903.64300)

Be reasonable where exception’s can be made. (Individual, Plains, MT - #4930.64350)

4.10 Proposed Rule Development

This section discusses the comments regarding the development of the proposed rule, including issues of the duration, authority, and scope of the rule; its general management direction; how the rule will be implemented; and the need for the rule. The development of the proposed rule evokes an array of responses from the public. Many of the responses include questions of clarification regarding the authority and scope of the proposed rule. Some respondents believe that the Forest Service should clarify the duration and statutory authority of the proposed rule. Another question of clarification put forth by some is whether the proposed rule will apply to national monuments. One citizen, citing the example of Assateague Island, wonders whether beaches will be considered roadless areas in the Final EIS. Additionally, the proposed rule should clarify how many of the 53 million acres of roadless areas will ultimately be protected, according to one person.

Others request changes in the general management direction of the proposed rule. Some respondents request that the proposed rule call for site-specific evaluations of roadless areas. “No one I have contacted within the Forest Service can tell me with any certainty just what, if any, benefit there will be to wildlife, flora, fauna, etc. from basically slamming the door on areas that already enjoy access,” protests one person.

On the subject of implementation, one elected official insists that the proposed rule not supercede projects that have already met all legal requirements. “Those local decisions based on NEPA review should not be exterminated by a NEPA document of national scope creating a national policy affecting local environments,” this California politician asserts. The relationship between the proposed rule and the current forest planning process educes many suggestions and questions from the public. “Land allocation decisions should be left to forest planning, not transportation policy rulemaking,” observes one person. Others wish to know whether the proposed rule will require land use designation changes and amendments to forest plans. More specifically, one citizen points out that the proposed rule would override existing forest guidelines for water management. The Forest Service should seriously consider such a contentious probability, according to this individual.

Citing similar concerns, one Georgia State Agency Representative suggests that the Forest Service consider that the proposed rule may hinder the resolution of key issues in forest plans. Taking a broader view, several individuals and groups request that the Forest Service address the effects of this proposed rule on forest plans throughout the nation, such as the Sierra Nevada Framework Project as well as regional planning efforts. Taking this concern one step further, one timber association representative claims that the proposed rule essentially makes forest plans meaningless. “The tens of millions of dollars spent in developing forest plans and in encouraging public input on land allocations in a particular national forest become money poorly spent if any Administration may freely disregard forest plans by adopting a politically expedient rulemaking,” charges this individual.

Some respondents feel so strongly about these potential problems with the proposed rule that they exhort the Forest Service to reconsider the adoption of this proposal and question the need for such a rule. Some believe that the proposed rule would necessitate the consideration of additional wilderness designation, which is perceived as restrictive to recreational access.

Similarly, one person indicates that wilderness designation may occur without regard for recreational opportunities. Another respondent remarks that the majority of roadless areas have already been evaluated and deemed not suitable for wilderness status.

Also questioning the need for the proposed rule, one Montana resident insists there are already enough roadless and wilderness areas. Existing forest management plans already ensure a healthy environment, according to another individual, precluding the need for the proposed rule. “I depend on the National Forest for my livelihood. I depend on the National Forests for recreation. I depend on the National Forests to maintain a healthy environment, with clean water, clean air, and bio-diversity. All these objectives are met by the existing forest management plans,” according to this person.

Additional comments are divided into Subsections: 4.10.1, Adequacy of Inventories and Analysis; 4.10.2, Road Classifications; and 4.10.3, Wilderness and National Monument Designations.

Public Concern: The Forest Service should clarify the duration and statutory authority of the proposed rule.

The duration of the prohibitions against road building in inventoried roadless areas at first confused me. The summary volume would have led me to believe that subsequent forest plans could undo this rule’s prohibitions. On more careful reading, especially of the rule itself, I was persuaded that the rule is intended to apply until it is superseded by another rule and could not be overruled at the Forest level in forest plan revision. If that is indeed your intention, would you like to make that statement stronger, more overt? (Individual, Camp Sherman, OR - #6100.33510)

Public Concern: The Forest Service should clarify whether the proposed rule will apply to national monuments.

The DEIS appears to be silent on the issue to whether National Monuments are to be included in the inventoried roadless area acreage totals. See Charts in appendix B of the DEIS . It appears that National Monuments are excluded from the protections set forth in the Roadless Area Conservation Policy. The Forest Service must clarify in the final rule whether or not monuments are included within the inventory. API recommends that these national treasures be afforded the same prohibition and procedural protections for unroaded inventoried roadless areas. (Environmental/Preservation Organization, Sacramento, CA - #15906.41400)

Public Concern: The Forest Service should clarify whether beaches are roadless areas.

I have reviewed the information on your website regarding the current environmental impact proposal and moratorium on new road construction in the inventory of “roadless” areas. My question is: since Assateague is a beach...is it a roadless area? I am guessing yes, and if so, under threat of losing all off-road access. But then I find that it is NOT in your inventory for either MD or VA (the island is in both states). Will off-road (beach) access be terminated on Assateague, if and when this proposal goes into effect (winter 2000 by your proposed timeline)? Can you please clarify this issue immediately, as it is of critical importance to the people on the Eastern Shore. (Recreational Organization, No Address - #2409.34000)

Public Concern: The proposed rule should clarify how many of the 53 million acres will be protected.

The initiative does not estimate how many of the 53 million acres are expected to actually be declared protected. This is very misleading to the public. (Individual, San Ramon, CA - #8492.42000)

Public Concern: The proposed rule should call for site-specific evaluations of roadless areas.

I strongly urge that individual roadless areas be evaluated site-specifically, as a prudent alternative to the large-scale blanket initiative that's been proposed. As diverse ecosystems, our public forests deserve no less. (Individual, No Address - #6274.41240)

No one I have contacted within the Forest Service can tell me with any certainty just what, if any, benefit there will be to wildlife, flora, fauna, etc. from basically slamming the door on areas that already enjoy access. I do not have a problem with closure on a site-specific basis; that is good management. I do have a problem with blanket closures in lieu of sound management practices, particularly when coupled with the above flaws in this initiative. (Individual, North Charleston, SC - #8277.41240)

Public Concern: The proposed rule should not supercede projects which have already met all legal requirements.

The Forest Service should recognize that uses exist in areas which may be subject to the proposed Roadless Area Policy, which uses have been lawfully constructed and permitted. Those uses have been subject to prior NEPA review. Those prior NEPA decisions are generally based on local conditions and thus more accurately reflect local environmental conditions. Those local decisions based on NEPA review should not be exterminated by a NEPA document of national scope creating a national policy affecting local environments. (County Elected Official, Jackson, CA - 16029.72230)

Public Concern: The proposed rule should leave land allocation decisions to forest planning.

Limit the scope of this rulemaking to the development and management of a transportation system needed to achieve forest plan goals and objectives. Land allocation decisions should be left to forest planning, not transportation policy rulemaking. (Individual, Eagle, ID - #13488.71300)

Public Concern: The Forest Service should clarify whether the proposed rule will require land use designation changes and amendments to forest plans.

Under this Draft EIS proposal, will new "roadless areas" become a land use designation? If so, does this land use designation change from matrix, late-successional reserve or riparian reserve to "roadless" require an amendment to the Northwest Forest Plan and individual Forest Plans? (Timber Association, Medford, OR - #13658.72230)

Public Concern: The Forest Service should consider that the proposed rule would override existing forest plans involving water management.

This proposal will make water management more difficult, and overrides the sound land management efforts in existing Forest Plans. (Individual, No Address - #13810.83100)

Public Concern: The Forest Service should consider that the proposed rule would hinder the resolution of key issues in forest plans.

The forest planning process, while not yet completed, is likely to provide for continuing the roadless character of most of Georgia's inventoried roadless acres, while also retaining some habitat management options. The national rule may very well hinder resolution of the key issues that remain to be resolved in the final version of the plan. (State Agency, Social Circle, GA - #13974.72230)

Public Concern: The Forest Service should address the effects of this proposed rule on forest plans throughout the nation.

This proposed rule will affect Forest Plans throughout this entire nation. This has taken a long period of study on the part of this USFS and demands very serious study, consideration, and analysis on our part. (Environmental/Preservation Organization, Harte, CA - #92.71100)

Mark me down in favor of the roadless initiative, but please realize that I expect further protection for these areas when it comes time for the Individual Forest Plans. (Individual, No Address - #5693.72230)

Please accept my strong opposition to the Proposed and Preferred Alternative in the Forest Service Roadless Area Conservation DEIS for the following reasons: The Proposal completely ignores all the hard work and science that went into existing Forest Plans and is a top-down directive that covers all inventoried roadless areas regardless of their management needs. (Individual, Hamilton, MT - #5693.72230)

SIERRA NEVADA FRAMEWORK PROJECT

It is mentioned that any changes to Forest or Grassland designation would come at the time of plan revision. The plan revisions are not done on a set timetable and many are thought to be near the deadline for review. Add to this the potential overturning of any revised plan by the Sierra Nevada Framework Project, which is not in process, is confusing at best. WE WOULD REQUEST THAT ALL DISCUSSION REGARDING ROADLESS DESIGNATION BE HEAVILY WEIGHTED IN THE RESEARCH BEING GATHERED FOR THE SIERRA NEVADA FRAMEWORK DEIS. IN THE CASE OF SIERRA-AT-TAHOE, IF THE DECISION IS MADE TO ALLOW THE REVISED FOREST PLAN TO REFLECT CONTINUED "POTENTIAL WINTER SPORTS" DESIGNATION TO THE AREA TO THE EAST OF SIERRA, THEN THE FRAMEWORK SHOULD STRONGLY TAKE THIS INTO REVIEW. As stated earlier, to make piece-meal designations of small areas without considering the best long-term strategies for the whole area is not wise nor prudent. (Individual, Lake Tahoe, CA - #2113.72230)

SOUTHERN APPALACHIANS

I want to mention that most of the national forests in the Southern Appalachians are currently revising their forest plans. I believe the plans should be developed in a way that will be most consistent with the eventual protection of all roadless areas under the proposed rule. In fact, the proposed rule envisions using the forest planning process to ensure maintenance of roadless character and protection of the ecological benefits these areas provide. Therefore I urge the Forest Service to ensure that plans currently being developed in the Southern Appalachians set aside all roadless areas in the most protective prescriptions. (Individual, Clemmons, NC - #1686.10110)

Public Concern: The Forest Service should consider that the proposed rule essentially makes forest plans meaningless.

This attempted reversal of the planning direction for 17% of the acreage in the National Forest System constitutes “top down” decision making in the extreme. The rulemaking should be terminated because of its pernicious policy implications alone. The rulemaking essentially makes forest plans meaningless. The tens of millions of dollars spent in developing forest plans and in encouraging public input on land allocations in a particular national forest become money poorly spent if any Administration may freely disregard forest plans by adopting a politically expedient rulemaking. (Timber Association, Eugene, OR - #15879.10200)

Public Concern: The Forest Service should not adopt the proposed rule.

THE PROPOSED RULE NECESSITATES THE CONSIDERATION OF WILDERNESS DESIGNATION

We are opposed to the current Roadless Area Conservation rule because it necessitates the consideration of any ‘roadless area’ as a future “Wilderness Area.” 37% of the Chattahoochee/Oconee National Forest in GA is “Wilderness Area.” Thus, this leaves 37% of the forest without management, limits access to the majority of forest visitors and is a direct violation of the ADA! (Recreational Organization, No Address - #9089.10200)

WILDERNESS DESIGNATION MAY OCCUR WITHOUT REGARD FOR RECREATIONAL OPPORTUNITIES

I oppose the roadless initiative because identified roadless areas may be placed on the fast track for wilderness designation without regard for any existing trails or recreational opportunities in those areas. This possibility concerns me even more for those roadless areas adjacent to existing wilderness areas. The roadless initiative, transportation rule, and ecosystem protection rule make the forest even more susceptible to meddling by special interest groups and have the ultimate goal of locking the public out of the public land for any activities. (Individual, Fort Collins, CO - #11334.10200)

THE MAJORITY OF ROADLESS AREAS HAVE ALREADY BEEN EVALUATED AND DEEMED NOT SUITABLE FOR WILDERNESS STATUS

I object because the majority of the lands proposed to be saved have already been evaluated and deemed not suitable for wilderness status. (Individual, San Ramon, CA - #8492.10200)

THERE ARE ALREADY ENOUGH ROADLESS AND WILDERNESS AREAS

There are enough roadless areas and wilderness areas in Montana. The percentage of people who use these areas is very small. To be able to use roadless areas an individual must be blessed with three resources, time, money and good health. Being a middle class citizen with a wife and three young children, we have little time for recreation. When we do have time, we head to the great outdoors, however, we go to places which are accessible by roads. Our six and four-year-olds cannot carry a backpack nor do we have time for horses or llamas. Prior to marriage and children I did have time for annual hikes in the Bob Marshall Wilderness which were high points of my life. I do believe there needs to be places set aside for human solitude. However, we already have an abundance of roadless land and there is land targeted in the National Roadless Protective Initiative which should be available for multiple uses and good stewardship timber harvest practices. These areas benefit more people than the small percentage of people who are using the roadless and wilderness areas today. (Individual, Kalispell, MT - #10759.10200)

EXISTING FOREST MANAGEMENT PLANS ALREADY ENSURE A HEALTHY ENVIRONMENT

I depend on the National Forest for my livelihood. I depend on the National Forests for recreation. I depend on the National Forests to maintain a healthy environment, with clean water, clean air, and bio-diversity. All these objectives are met by the existing forest management plans. (Individual, Ontonagon, MI - #8109.41510)

4.10.1 Adequacy of Inventories and Analysis

The adequacy of roadless area inventories and the analysis of these areas for inclusion in the proposed rule evokes many responses from the public. Several comments address the need to perform a new road inventory. “Why hasn’t an inventory been done prior to this proposal?” queries one respondent. Similarly, one person recommends that the Final EIS reflect inventories and evaluations that are no more than five years old. Another reason some people offer for performing a new road inventory is that the Forest Service has acquired more roadless land since previous inventories were completed. These respondents request that such lands be included in the proposed rule. Finally, one respondent requests that the Forest Service state when it will conduct an inventory of the roadless areas.

This subsection is further divided into: 4.10.1.1, RARE I and RARE II; 4.10.1.2, Roadless Area Inventory Criteria; and 4.10.1.3, Further Analysis.

In 4.10.1.1, respondents discuss previous inventories. Rather than conducting new roadless area inventories, some respondents believe the Forest Service should go forward with inventories that have already been completed. One citizen feels that the Forest Service should rely on the RARE I inventory for roadless designations. Another individual believes that the Forest Service should include all RARE II areas as part of the final rule.

However, one environmental organization suggests that the Forest Service modify language in the Draft EIS to acknowledge that RARE II and Forest Plan inventories do not reflect the current knowledge and public awareness of the important values of roadless areas. Citing information in the DEIS which indicates that some of the national forests have had significant percentages of previously designated RARE II areas degraded through road building and timber harvest, an individual submits that the Forest Service should explain the extent and impacts of road-building and logging in RARE II roadless areas.

Another environmental organization contends that the entire RARE II inventory is inadequate because it omits areas that meet the necessary criteria. This group offers a specific example, such as Camp Hutchins, to support their contention.

Questions and suggestions for roadless area inventory criteria are analyzed in 4.10.1.2. Many respondents request that the specific characteristics the Forest Service wishes to protect in each inventoried roadless area be delineated in the Final EIS. A less capacious suggestion is offered by a conservation organization. This group believes the Forest Service should identify roadless area characteristics that are clear and not open to interpretation. Another individual encourages the Forest Service to consider establishing specific criteria for roadless area implementation. One environmental organization requests that the Forest Service revise the list of roadless characteristics. Even more specifically, a recreational organization recommends that the Forest Service include “lack of roads” in its list of roadless characteristics, and a conservation organization lists scenic management, historical areas, and Wilderness potential among its recommendations. Similarly, another conservation organization suggests that the Forest Service eliminate references to dispersed motorized recreation as a characteristic of roadless areas in the final rule. One respondent urges the Forest Service to establish depth and width criteria so

roadless areas remain manageable. The Forest Service should exclude unsuitable roadless areas from the roadless inventory, according to some. Sites that have been determined as not suitable for wilderness designation should not be included on the inventoried roadless list, according to one such respondent. Another suggestion offered by respondents is to use a computer-based modeling system to assign values of use and condition that would be used as management criteria applicable to inventoried roadless areas. Equally daunting is the suggestion from an Oregon resident that no set of criteria can adequately capture the unique qualities of individual roadless areas.

The status in the proposed rule of uninventoried roadless areas is unclear to many readers of the Draft EIS. They feel that the Forest Service should address the potential impacts of this rule on those areas. Citing the small percentage of lumber currently being generated by National Forest System lands, others contend that the Forest Service should add smaller uninventoried roadless areas to the current roads inventory.

One final question of clarification rounds out this section. An individual asks that the Forest Service clarify why the estimated roadless acreage has grown over the course of planning for the proposed rule. “A main selling point of the program was the [roadless] areas were a mere 8% of the total acres of the national forests. Now it is 25%,” this person remarks. “How and why did the acreage grow so much?”

In addition to the clarification requested regarding previous inventories, many respondents offer suggestions for further roadless area analysis in 4.10.1.3. One person posits that the Forest Service should not declare large areas of the national forests as roadless without first conducting an inventory of these areas for existing trails. Another individual, also finding current inventories lacking, asks that the Forest Service inventory any roadless area of 1000 acres or more.

Others offer specific regions or forests they believe should be re-inventoried. Some respondents request that the Forest Service reevaluate the number of roads in New England and Mid-Atlantic forests. Similarly, the Forest Service should re-inventory areas within the Hoosier National Forest, according to one Indiana resident. This person identifies specific areas within the forest that have been purportedly underestimated. Additionally, one denizen of the Grand Canyon State asks that the Forest Service resurvey Arizona to ensure accurate roadless acreage. The final request of this section involves the Chippewa and Superior National Forests. The Forest Service should identify additional unroaded areas in these forests, according to one constituent.

Public Concern: The Forest Service should perform a new road inventory.

There has not been a proper inventory performed on these roads prior to proposing this Forest Service Roadless Area Conservation Proposed Rule. The last inventory performed was done on these roads in 1978. That was twenty-two years ago. Why hasn't an inventory been done prior to this proposal? (Individual, Yellow Jacket, CO - #3295.64421)

Public Concern: The Final EIS should reflect inventories and evaluations that are no more than five years old.

The final EIS must reflect inventories and evaluations no more than five years old. (Individual, Mackay, ID - #8575.64421)

Public Concern: The Forest Service should include land acquired since previous inventories were completed.

Congress mandated a comprehensive study of the land received from Big Sky Lumber in order to incorporate this land into the Forest Plan, a process which is now underway. Obviously, instead of this process and the Roadless Initiative proceeding in isolation FROM each other, these studies must be combined to the extent they overlap. Not only is such a combination the logical means of assuring the resource protection which the public and Congress expected in acquiring the land from Big Sky Lumber, but this result is also mandated by President Clinton's original directive [to] the Forest Service: Specifically, I direct the Forest Service to develop, and propose for public comment, regulations to provide appropriate long-term protection for most or all of these currently inventoried 'roadless' areas, AND TO DETERMINE WHETHER SUCH PROTECTION IS WARRANTED FOR ANY SMALLER 'ROADLESS' AREAS NOT YET INVENTORIED." President Clinton, October 13, 1999 (Environmental/Preservation Organization, Bozeman, MT - #16097.72200)

Public Concern: The Forest Service should state when it will conduct an inventory of the uninventoried roadless areas.

Prior to adopting the final rule, the Forest Service should clearly specify when the "uninventoried roadless areas" are to be inventoried and clarify that existing management is not changed prior to completion of the inventory. Absent a clear and strict time line, the failure to act could create additional gridlock in management of the National Forests. (County Agency, John Day, OR - #16087.53400)

4.10.1.1 RARE I and RARE II

Public Concern: The Forest Service should rely on the RARE I inventory for roadless designations.

I disagree with any increase in the number of roadless areas in the U.S. We identified all of the appropriate areas during RARE I. RARE 2 wasn't needed, and included areas that should have never been designated as roadless areas. Many of them were already roaded and being used by the public and industry alike. Now they are unmanaged and in chaos. Now you are proposing additional roadless areas from regions that have already been evaluated twice, and passed over. I say you did it right the first time, you don't need to do it again and again. (Individual, Imbler, OR - #5783.10200)

Public Concern: The Forest Service should include all RARE II areas as part of the final rule.

In Texas, we want all Rare II areas protected. That should amount to about 31,000 acres, since there were 69,000 acres of Rare II areas, and about 38,000 of them are now wilderness areas. Texas National Forests only has 6% of its acreage in the non-roaded category of the Recreation Opportunity Spectrum, with 94% in the roaded category. We protest the fact that the forest supervisor has improperly excluded all but 4,000 acres of the Rare II areas from

consideration, and we call on the deciding official to include all of these areas in the Final Rule and EIS. (Environmental/Conservation, Houston, TX - #8936.70000)

Public Concern: The Forest Service should modify language in the Draft EIS to acknowledge that RARE II and forest plan inventories do not reflect new knowledge and public awareness of the important values of roadless areas.

The statement in the DEIS about the inventoried roadless area having been already evaluated for wilderness recommendation and rejected should be deleted from the FEIS and replaced with a statement noting that RARE II and Forest Plan inventories do not reflect the new and current scientific knowledge and increasing public awareness of the nationally important values of roadless areas. The FEIS should also inform the public about the NFMA process of evaluating roadless areas during forest plan revisions. (Environmental/Preservation Organization, Cave Junction, OR - #16188.53600)

Public Concern: The Forest Service should explain the extent and impacts of road-building and timber harvest in RARE II roadless areas.

There is some shocking information in the DEIS which indicates that some of the national forests have had significant percentages of previously designated roadless areas (in the RARE II program in 1978) degraded through road building and logging since that time. For example, in Region 8, the George Washington NF in Virginia had 261,000 acres of roadless areas identified in the RARE II program. Of that, only 32,000 acres have designated wilderness. Yet the current initiative now has only 32,000 acres designated as roadless. This leaves nearly 200,000 acres of previously identified roadless areas unaccounted for, which means that they have been degraded by roads and logging. In Region 9, the Monogahela NF in West Virginia had 173,000 acres identified in the RARE II analysis of which 28,000 are designated as wilderness. Yet, the current proposal only identifies 79,000 acres of current roadless areas in the Monogahela. This means that over 65,000 acres of previously inventoried roadless areas are unaccounted for and likely degraded. Other forests with similar significant reductions in acreage include the White Mt. in New Hampshire, the Chequamegon-Nicolet in Wisconsin, and the Cherokee in Tennessee. How did this happen and what is the impact of this? (Individual, Brookport, IL - #126.84600)

Public Concern: The Forest Service should reevaluate the adequacy of the RARE II Inventory analysis.

Since Camp Hutchins should have been included as a RARE II area, the Forest Service gave no explanation for not including it, the Forest Service still has not been able to come up with an explanation, and Camp Hutchins still meets the requirements for a RARE II area, the proper course of action would be to prepare an errata sheet for the RARE II EIS to include Camp Hutchins as a RARE II area. Since the Forest Service is only relying on the part of the RARE II EIS that identified the RARE II areas and the recommendations are not being used, a SEIS would not be needed. (Environmental/Preservation Organization, Wood River, IL - #43581.50000)

4.10.1.2 Roadless Area Inventory Criteria

Public Concern: The Final EIS should clarify what characteristics the Forest Service wants to protect for each inventoried roadless area.

In the FEIS the Forest Service should describe each inventoried roadless area and for each area describe what characteristics the Forest Service wants to protect, and current or potential fire, insect, or disease risks, and how the Roadless Initiative would change the forest plan direction. (Individual, Paonia, CO - #11343.30000)

Public Concern: The Forest Service should identify roadless area characteristics which are clear and not open to competing interpretations.

In addition, the roadless area characteristics listed at proposed rule # 294.13 are vague and therefore vulnerable to mis-application in ways that may exploit roadless areas rather than conserve them and their national significance. (Environmental/Preservation Organization, Cave Junction, OR - #16188.82000)

Public Concern: The Forest Service should consider establishing criteria for roadless area implementation.

As to solitude, I have not found any place in the forest wilderness system where I have been able to escape man. Whether it is in the small Bucks Wilderness, the California State Park Sinkyone Wilderness or well off the roadways in Yosemite, my solitude has been broken more than once a day by the sound and sight of jet airplanes. Perhaps the airspace should be managed around Wilderness such that we can find the place where true solitude is possible. Perhaps a circle of influence of 100 to 200 miles would allow places for true wilderness. Maybe the roadless areas should be screened by the availability of these criteria. If you can see or hear any man or machine on the acre it should not be classified as wilderness or roadless by the old definitions. (Individual, Chico, CA - #10596.90010)

Public Concern: The Forest Service should revise the list of characteristics and values of roadless areas.

The characteristics and values of roadless areas must first be identified. The following list includes characteristics identified in the summary of the DEIS (S-14). Seven additional characteristics have been identified, and should be considered as well.

- 1) Soil, water, and air
- 2) Sources of public drinking water
- 3) Diversity of plant and animal communities
- 4) Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land
- 5) Primitive, semi-primitive non-motorized, and semi-primitive motorized classes of dispersed recreation
- 6) Reference landscapes
- 7) Landscape character and scenic integrity
- 8) Traditional cultural properties and sacred sites
- 9) Other locally identified unique characteristics
- *10) Roadlessness
- *11) Natural quiet; opportunity for solitude
- *12) Natural fire regime
- *13) Natural watershed function
- *14) Shape and size of area
- *15) Roadless area integrity
- *16) Wildlands Values; associated characteristics. (Environmental/Preservation Organization, Albuquerque, NM - #43737.32000)

Public Concern: The Forest Service should consider “lack of roads” as a “roadless characteristic.”

We find it very inconsistent that lack of roads is not listed as a “roadless characteristic.” (Recreation Organization, Salt Lake City, UT - #15896.71200)

Public Concern: Part 294.13(a) of the final rule should include new evaluation criteria for scenic management, historical areas, and wilderness potential.

Landscape character and scenic integrity;

CFR 294.13(a)(7): ALSO INCLUDE EVALUATION OF OTHER ASPECTS OF SCENIC MANAGEMENT SYSTEM (SMS). FOR EXAMPLE, EVALUATE AREAS SEEN FROM BLUE RIDGE PARKWAY OR APPALACHIAN TRAIL. WE SUGGEST INCLUDING REFERENCE TO “SPECIAL PLACES” IDENTIFIED IN THE SMS IN THIS SECTION.

...Other locally identified unique characteristics.

CFR 294.13(a)(9): INCLUDE “SPECIAL PLACES” FROM SMS HERE IF NOT INCLUDED.

(Environmental/Preservation Organization, No Address - #15883.90210)

CFR 294.13(a): ADD THE FOLLOWING CATEGORY TO THE LIST (a)(1-9):

“HISTORICAL AREAS”. (Environmental/Preservation Organization, No Address - #15883.90230)

CFR 294.13(a): ADD THE FOLLOWING CATEGORY TO THE LIST (a)(1-9):

“WILDERNESS POTENTIAL”. THE ORIGINAL PURPOSE FOR CONDUCTING ROADLESS INVENTORIES WAS TO REVIEW THEIR SUITABILITY FOR WILDERNESS AND TO RECOMMEND SUITABLE AREAS FOR ADDITION TO THE WILDERNESS PRESERVATION SYSTEM. THIS SHOULD BE EXPLICITLY RECOGNIZED IN THE LIST OF CHARACTERISTICS, WHICH SHOULD BE EVALUATED IN REVISION OF PLANS. (Environmental/Preservation Organization, No Address - #15883.90240)

I believe that one component used to evaluate “roadless areas” deals with the “historic values” contained within the roadless areas to be considered. I have prepared a very brief “Heritage Resources Summary Evaluations” document that summarizes the potential and known “historic values” for these areas. Included within ‘historic values’, as I see it, should be three components:

1. Archaeological Value (dealing primarily with prehistoric archeological sites)
 2. Historic Value (dealing primarily with historic sites)
 3. Other Values (dealing primarily with Native American cultural values and “traditional cultural places” or TCPs)
- (Federal Agency, Alturas, CA - #16099.90230)

Public Concern: Part 295.13a of the final rule should eliminate reference to dispersed motorized recreation as a characteristic of roadless areas.

We also recommend that the final policy drop the reference to “motorized” dispersed recreation as a characteristic of roadless and unroaded areas to be considered in the forest plan revision process (p. A-27, [section] 295.13 (a)(5)). (Environmental/Preservation Organization, Flagstaff, AZ - #43415.91610)

Public Concern: The Forest Service should consider that no discrete set of criteria can characterize the unique values and characteristics of individual roadless areas.

It is my opinion that the individual roadless area values and characteristics are each unique in themselves. And that an environmental analysis must be completed for each area--NOT for the 51.5 million acres of [national forest] land in just one action. (Individual, McMinnville, OR - #1071.63000)

Public Concern: The Forest Service should conduct a state-by-state analysis of roadless areas.

Before turning to the Proposed Rule itself, let me note that one of the challenges in meaningfully assessing it was the difficulty in determining its specific impacts on the forests and communities of Oregon. While I understand this is a rule developed for national application, it would have nevertheless been much more helpful to have had at least a state-by-state analysis of the condition of roadless areas, along with the impacts of the proposed restrictions and procedures. I encourage you to include such a state-by-state analysis in your Final EIS, if at all possible. Please see the enclosed memoranda in which we suggest that certain issues be further explored in your Final EIS and Rule. (State Elected Official, Salem, OR - #18661.70000)

Public Concern: The Forest Service should use a computer-based modeling system to assign values of use and condition to inventoried roadless areas.

What I propose and I suspect is already on the table, is a compromise of sorts. I propose that the USFS accurately inventory all USFS lands in question into a computer-based modeling system, where all lands are assigned values of use and condition. For example, some of that 43 million acres of USFS land is clearly best for wilderness designation, while other is best for recreation. Some is suitable for the historic definition of multi-use, meaning most of the above, including harvest. Each of these lands designated for multi-use would be assigned some level of maturity to easily ascertain annual harvest potential. If the annual agreed upon harvest is beyond that available in currently roaded inventory, a suitable portion of the 43 million acres deemed harvestable would act and be managed as a bank account of surplus harvest. (If any portion of this “bank account” could be commercially harvested without roads, this should be preferred practice.) Forest products companies would also be responsible for ensuring the “bank account” is conservatively managed and augmented when possible. (Individual, Fort Collins, CO - #358.61300)

Public Concern: The Forest Service should establish depth and width criteria to assure that irregularly shaped roadless areas remain manageable.

We have some real concerns concerning recent Roadless Area inventory. Number of acres alone is not a real good criterion as it is possible with GIS technology to identify sizable areas in a pattern of fingers that would be virtually impossible to manage on the ground. There has got to be some depth and width criteria for these areas in order to make them meaningful and manageable. Also, we feel that designating areas as smaller than 5,000 acres will result in a series of small “hands-off” islands across the landscape that will be unmanageable, unenforceable and the potential infection sources of continued forest health problems. (County Elected Official, Kanab, UT - #47910.71000)

Public Concern: The Forest Service should state the overall size of non-inventoried areas and address the potential impacts of this rule on those areas.

How large is the non-inventoried area within the NFS system and what impact will this proposed rule have on use of these lands for future uses? It is unclear if the proposed rule will affect non-inventoried roadless areas in the national forests. (Individual, Moses Lake, WA - #718.71100)

Public Concern: The Forest Service should add smaller uninventoried roadless areas to the current roadless inventory.

The Forest Service's data also shows that only 4 percent of the nation's wood supply comes from our national forests; and of that small amount only about 5 percent of it would be affected if logging is discontinued in the

roadless areas included in the Forest Service inventory. So only about 2 tenths of 1 percent (0.02%) of the nations wood supply would be affected by discontinuing logging in these roadless areas. The addition of smaller uninventoried roadless areas to this inventory, which should be done, would not make a significant difference in these numbers. (Individual, Knoxville, TN - #6846.93300)

Public Concern: The Forest Service should exclude unsuitable roadless areas from the roadless inventory.

We believe that public lands that have been removed from Wilderness (Hogback Basin) should also and concurrently be removed from roadless designation. ROADLESS DESIGNATION WAS INITIATED TO INVENTORY POTENTIAL SITES FOR WILDERNESS. SITES SUCH AS HOGBACK BASIN, HAVE BEEN DETERMINED AS NOT SUITABLE FOR WILDERNESS AND THEREFORE, HAS NO NEED OR RIGHT BEING ON THE INVENTORIED ROADLESS LIST. (Individual, White Pass, WA - #17633.57100)

Public Concern: The Forest Service should clarify why the estimated roadless acreage has grown over the course of planning for the proposed rule.

In the first round of planning the roadless acreage was estimated to be about 8% and a main selling point of the program was the areas were a mere 8% of the total acres of the national forests. Now it is 25%. How and why did the acreage grow so much? (Individual, Chico, CA - #10596.33300)

4.10.1.3 Further Analysis

Public Concern: The Forest Service should not declare large areas of the national forests roadless without first conducting an inventory of these areas for existing trails.

As a concerned OHV trail user, I am alarmed by the move to declare large areas of the national forests “roadless” without an inventory of these areas for existing trails. (Individual, Valley Park, MO - #2201.10200)

Public Concern: The Forest Service should inventory any roadless area of 1000 acres or more.

Any area 1,000 acres or more should be inventoried, which in Washington is about ½ of our national forest roadless areas. (Individual, No Address - #6270.10110)

Public Concern: The Forest Service should reevaluate the number of roads in New England and Mid-Atlantic forests.

I would also encourage you to think about reevaluating the number of roads from our forests in the New England and Mid Atlantic Regions. Having lived in New Hampshire, I appreciate the delicacy of these forests. Acid rain is enough for them to contend with. (Individual, Minneapolis, MN - #6306.71300)

Public Concern: The Forest Service should re-inventory areas within the Hoosier National Forest.

As for the Hoosier National Forest in southern Indiana, we feel that the program's 7,000 inventoried acres at Mogan Ridge is probably understated, and should be reevaluated....there are other parts of the Hoosier which should be inventoried, including Nebo Ridge, and six or eight others such as Middle Fork Deer Creek, Hickory Ridge, Porter Hollow, and any others containing 1000 acres or more of roadless area. (Individual, Hometown, IN - #2756.64423)

Public Concern: The Forest Service should resurvey Arizona to ensure accurate roadless acreage.

DEIS only includes 1.1 million of acres of roadless USFS land in Arizona. In fact, there are 1.5 million acres. We should include the full 1.5 million acres for Arizona, and any other incomplete states should be re-surveyed. (Individual, Scottsdale, AZ - #4633.33520)

Public Concern: The Forest Service should identify additional unroaded areas in the Chippewa and Superior National Forests.

I urge the Forest Service in Minnesota to begin immediately to identify additional unroaded areas in Chippewa and Superior N.F's-beyond those previously inventoried. (Individual, Minneapolis, MN - #13302.44400)

4.10.2 Road Classifications

The numerous varieties and classifications of roads and trails within the National Forest System elicit many suggestions regarding their treatment under the proposed rule. Some respondents recommend that the Forest Service carry out road classification on a regional, rather than national, basis. Others caution the Forest Service that the speed with which this initiative is being implemented is causing inaccurate roadless classifications.

Stating that the proposed definitions of "unroaded" and "classified road" eliminate far too many areas deserving of protection, one person suggests that the Forest Service create a new category of unroaded areas. Another respondent, also dissatisfied with the definition of "unroaded," requests that the Forest Service change the definition of "unroaded" to "a portion of an inventoried roadless area in which no classified road has been constructed since the area was inventoried." A similar definitional change is requested by a Nevadan. The Forest Service should refer to areas with pre-inventory roads as semi-roadless areas and clarify how they will be affected by this rule," asserts this individual.

The types of roads allowed within areas designated as roadless also evokes varied responses from the public. The Forest Service should not designate areas which contain 2477 rights of way through them as roadless areas, according to some. When delineating roadless areas, others contend, the Forest Service should classify temporary roads as roads. Additionally, several respondents believe that the Forest Service should include historic roads, 4-wheel drive routes, and trails less than 50 inches wide in its roadless area inventory.

Similarly, many people ask that the Forest Service clarify whether decommissioning or obliterating roads would create a roadless area. Other respondents require no such clarification. They exhort the Forest Service to designate areas with a few roads that could be blocked or obliterated as roadless. “Areas with a few roads that could be ‘put to bed,’ that is gated, disked, planted with locally native plants and then obliterated, should be considered roadless,” according to these constituents.

Citing analogous reasons, some individuals maintain that the Forest Service should not allow “ghost” roads to disqualify an area as roadless. Like-minded respondents request that areas with primitive roads, jeep trails or classified roads should not be disqualified from roadless designation. Wishing to protect certain areas, other citizens ask that the Forest Service clarify the status of “phantom roads” to ensure that road construction could not be performed under the guise of repairing existing roadways.

A miscellany of diverse concerns rounds out this section. Exactly how the roaded portions of inventoried roadless areas will be determined by the Forest Service should be clarified in the Final EIS, according to one person. Another respondent believes that the Forest Service should consider removing areas from the roadless area classification that cannot be logged with temporary roads. Similarly, one timber industry representative thinks that the Forest Service should discontinue the use of the term “roadless” to describe areas that contain forest products. Finally, one Colorado resident suggests that the Roadless Area designation should be eliminated because, “it does nothing but place constraints on resource uses, planning and management efforts while taking commitment of funds that could be better used.”

Public Concern: The Forest Service should carry out road classification on a regional basis.

Road classification should be regionalized--based on geography, climate, etc.--not nationwide. (Individual, Duluth, MN - #536.44300)

While the proposed rules address classified and unclassified roads, we suggest that it also develop a management strategy for those roads that have been closed or obliterated in the last few years to create unroaded areas. These recently created unroaded areas do not contain the same basic values that are the driving force for this rulemaking and should therefore either be excluded or a new category developed for these lands. (County Agency, John Day, OR - #16087.64351)

Public Concern: The Forest Service should consider that the speed with which this initiative is being implemented is causing inaccurate roadless classifications.

It appears that the speed with which the initiative is being implemented is leading to a significant amount of our land being classified as “roadless” even though it has undocumented trails and other routes. (Individual, Edwall, WA - #2335.44420)

Public Concern: The Forest Service should create a new category of “unroaded” areas.

The creation of a new category of “unroaded” areas may be warranted, but the proposed definitions of “unroaded” and “classified road” eliminate far too many areas deserving of protection. (Individual, San Diego, CA - #25303.64400)

Public Concern: The Forest Service should change the definition of “unroaded” to “a portion of an inventoried roadless area in which no classified road has been constructed since the area was inventoried.”

The definition of “unroaded portion of an inventoried roadless area” should be changed to read: “a portion of an inventoried roadless area in which no classified road has been constructed since the area was inventoried.” (Mining Association, Reno, NV - #15907.3110)

Public Concern: The Forest Service should refer to areas with pre-inventory roads as semi-roadless areas and clarify how they will be affected by this rule.

Page S-6: Under inventoried roadless areas: The criteria used for RARE II allowed some areas with roads to be inventoried as “roadless.” Therefore some areas contain these pre-inventory roads. Shouldn’t they be called semi-roadless areas? What percentage will be allowed under the criteria? Are we to assume the roads will be decommissioned? (Individual, Carson City, NV - #669.33500)

Public Concern: The Forest Service should not designate roadless areas which contain 2477 rights of way through them.

Some of the roadless areas (back country prescription) have 2477 rights-of-way thru them. These areas are not roadless. (Individual, Vila Grove, CO - #8453.71110)

Public Concern: When delineating roadless areas, the Forest Service should classify temporary roads as roads.

One flaw with the Roadless Area Conservation Plan is that temporary roads were not counted as roads when setting up these roadless areas. That has the effect of making the roadless areas quite large. If indeed these areas are to be included in the Roadless areas then the use of temporary roads to extract timber, etc., should not be prohibited as they were not considered roads in the original definition. You cannot have it both ways by first saying they are not roads and then saying that building a temporary road is prohibited because it is a road. Either the roadless areas considered should be drastically reduced or the use of temporary roads should be an allowed activity. People like it when people or their government are consistent in their terms. If you want to keep or maintain trust then you have to be consistent. (Individual, Gilbert, MN - #3539.32100)

Public Concern: The Forest Service should include historic roads in its roadless area inventory.

You talk about inventoried roads--NO GOOD. You only inventoried the ones YOU wish to show. If a road has been there for 125 years but is not on YOUR inventory--then it does not exist. Several old historic roads in our area are NOT on your inventory but yet they were the main route from town to town when the rail line existed. Your

forest plan is full of such deceit and unless you include these historic roads presently used by 4X4s, ATVs, snowmobiles, etc. then your plan is one that should be dealt with by Congress. (Individual, Buena Vista, CO - #3536.64421)

Public Concern: The Forest Service should include all existing roads and 4-wheel drive routes in the roadless area inventory.

Have all existing Forest Routes been included in the Inventory of Roadless Areas? Have all Roads and 4 Wheel Drive Routes shown on most recent USG Topographical maps been included in the Inventory of Roadless Areas? (Individual, No Address - #6301.71300)

Public Concern: The Forest Service should recognize the existence of trails less than 50 inches wide.

The proposed rule does not recognize the existence of any vehicle path less than 50" wide. Yet most motorcycle trails, and nearly all of the best (and most environmentally sensitive) ones are single tracks, generally about 12" wide. Other roads, such as old logging and mine roads, are ignored simply because they were established by someone other than a government employee and do not carry an official route number. This does not make them any less used by, or less useful to, the off road recreationist. (Timber Company/Association, Rapid City, SD - #15900.64421)

Public Concern: The Forest Service should clarify whether decommissioning or obliterating roads would create a roadless area.

Does decommissioning roads create, or could it create a roadless area? (Individual, Pocatello, ID - #2959.84610)

The entire analysis is flawed because it does not take into account roadless areas that will be created in the future. For example, on the Deschutes National Forest from 1994 through 1999, 159 miles of road were obliterated while only 5.9 miles of road has been constructed. In other words there has been a net decrease in total road miles (and therefore increase in roadless acres) since 1994. (Individual, Bend, OR - #735.70000)

The Forest Service needs to clearly explain how it intends to treat previously roaded lands where road closures and substantial revegetation may have restored the functional appearance of roadless conditions. (Individual, Columbia Falls, MT - #9957.64420)

Public Concern: The Forest Service should consider for roadless designation, areas with a few roads that could be blocked or obliterated.

The EIS should say that national forests in the U.S. contain an estimated 380,000 miles of roads. Areas with a few roads that could be "put to bed," that is gated, disked, planted with locally native plants and then obliterated, should be considered roadless. (Individual, Bakersfield, CA - #974.63000)

Public Concern: The Forest Service should not allow "ghost" roads to disqualify an area as roadless.

I am also concerned about the possibility that roadless areas could be disqualified from protection due to the presence of unclassified "ghost" roads. I am pleased that the draft policy specifies that portions of inventoried roadless areas will be omitted only when a "classified road has been constructed" since the past inventory (p. A-27).

The final rule should make it clear that the existence of user-created and other unclassified roads is not an appropriate reason to remove a roadless area from the inventory. (Individual, Davis, CA - #9458.71300)

Public Concern: Areas with primitive roads, jeep trails, or classified roads should not be disqualified from roadless designation.

Primitive roads, jeep trails, and “roads” which exist mainly on a map somewhere (“classified roads”) should not disqualify areas from the very appropriate environmental protections Chief Dombeck and the President have envisioned for our national forests. (Individual, San Diego, CA - #25303.64400)

Public Concern: The Forest Service should clarify the status of “phantom roads” to ensure that road construction could not be performed under the guise of repairing existing roadways.

That is, under the Forest Service's preferred alternative 2-b, if I understand it correctly, the area by these “phantom roads” can be logged, and could not be considered a “roadless area”. The status of these “phantom roads” needs to be clarified to ensure that road construction work could not be performed under the guise of repairing existing roadways. (Individual, Fayetteville, AR - #15439.32100)

Public Concern: The Forest Service should explain how the roaded portions of inventoried roadless areas will be delineated.

The rule proposes that road building will be prohibited in currently unroaded portions of inventoried roadless areas. How will the portions that have been roaded be determined? Will the road and/or cut blocks be the boundaries? If not, what method will be used? (Individual, Missoula, MT - #1142.63000)

Public Concern: The Forest Service should consider removing areas that cannot be harvested with temporary roads from the roadless area classification.

In those areas that cannot be logged with the use of temporary roads then one consideration should be to remove it from the roadless area classification so that permanent roads can be built. (Individual, Gilbert, MN - #3539.63000)

Public Concern: The Forest Service should discontinue the use of the term roadless to describe areas which contain forest products.

Consider discontinuing use of the term “Roadless” to describe areas that contain forest products necessary for the future operation of our industry as well as our community’s recreational roads and trails. (Timber Company/Association, East Lansing, MI - #1043.64220)

Public Concern: The Roadless Area designation should be eliminated.

The Roadless Area designation should be eliminated. It does nothing but place constraints on resource uses, planning and management efforts while taking commitment of funds that could be better used. (Individual, Pueblo, CO - #2884.61300)

A combination of A and B alternatives is the most acceptable. Alternative B would be the best, if the word “protect” was replaced with the word “managed,” for the following reasons: forest land use plans and subsequent project plans should consider all natural resources available and their relative value whether tangible or intangible. Economic values and effects on local communities must be factored into any decisions made. If objectively done, this leaves no need for roadless designation. Such designation just presents a road block in the decision making process. The Forest Service has inventories of all known natural resources on each national forest. Also, there are inventories of soils, geologic and fire hazards. These indicate the uniqueness of just about every locality. This uniqueness should be considered in every action proposed. It is impossible to capitalize on this uniqueness if the land is encumbered by superfluous designations on a national basis. (Individual, Pueblo, CO - #2884.61300)

4.10.3 Wilderness and National Monument Designations

The designation of wilderness continues to be a contentious issue in this nation. Responses to the Draft EIS reflect this reality. Several respondents note that the document contains seemingly contradictory statements regarding the possible future designation of roadless areas as wilderness areas. These people would like the Forest Service to be consistent on this issue. Proponents of wilderness, ignoring these perceived inconsistencies, request that the Forest Service judge each roadless area independently on its own merits for wilderness designation.

Other wilderness proponents exhort the Forest Service to manage all roadless areas so as to protect their eligibility for wilderness designation. Taking this concept further, several respondents request that the Forest Service designate and maintain all remaining roadless areas, including the Yaak Valley in Montana, the Tongass National Forest, roadless areas in Idaho, as well as estuaries and wetlands, as wilderness in perpetuity.

Fearing that roadless areas will be developed while awaiting assessment, some respondents urge the Forest Service to quickly assess lands that qualify as wilderness. “The area of national parks and wilderness should increase as the population does,” according to one constituent. The Forest Service should designate wilderness areas in response to population increases, according to this individual.

Responding to a tangentially related concern, one person believes that the proposed rule “should provide guidelines and policies that would require that forest plans be based on principal river and tributary drainage areas rather than existing political boundaries.” Seeking clarification regarding wilderness designations, another respondent wonders whether stewardship activities and temporary roads would disqualify an area from potential wilderness designation.

“I like the idea of protection without necessarily designating an area as wilderness, because that leaves the areas open to a greater variety of possible recreation,” according to one Montanan. The Forest Service should consider designations other than wilderness, this person proffers. More specifically, one citizen requests that the Final EIS recommend to the President that all roadless areas be designated national monuments.

Not all the comments regarding wilderness designation come from proponents of such classifications. The Forest Service should postpone the wilderness recommendation process until the next round of forest plan revisions, 15 years hence, “because it would be too confusing and overwhelming to do both [wilderness and roadless/unroaded evaluations] along with trying

to evaluate ecological systems,” according to one constituent. Claiming that additional wilderness areas would “restrict access of public lands to the citizens of America,” several respondents demand that the Forest Service not attempt to designate any more wilderness areas.

Public Concern: The Forest Service should be consistent in statements regarding the possible future designation of roadless areas as wilderness areas.

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)

Public Concern: The Forest Service should judge each roadless area independently on its own merits for wilderness designation.

Each area should be judged independently and separately on its own merits for wilderness designation. (Individual, Carson City, NV - #2343.64230)

Public Concern: The Forest Service should manage all roadless areas so as to protect their eligibility for wilderness designation.

It should be mandated that all roadless areas be managed to protect their eligibility for wilderness designation. (Individual, Missoula, MT - #831.64411)

We wish that the unclassified roadless lands, especially in Montana’s Rocky Mountain Front were managed just like wilderness areas. (Individual, Choteau, MT - #10389.64150)

Public Concern: The Forest Service should designate and maintain all remaining roadless areas as wilderness in perpetuity.

With so little water and land left for habitat preservation, we recommend the most restrictive use of all roadless [areas]. We recommend that all remaining roadless areas be designated and maintained as wilderness in perpetuity. (Individual, No Address - #318.64411)

Create more and larger wilderness areas. (Individual, Naperville, IL - #204.64411)

YAAK VALLEY

Please keep the last remaining roadless land in the “Yaak Valley” as they are, roadless, forever, with a wilderness designation. (Individual, Saint Paul, MN - #1688.64411)

TONGASS NATIONAL FOREST

The Tongass national forest should include 8.5 million acres designated as permanent wilderness today. Delaying this rule will allow a future administration to ruin that forest. (Individual, Woodinville, WA - #21.64411)

IDAHO

I support the designation of wilderness lands in the state of Idaho. It is clear to me at this point a government intervention is needed to secure these lands as private citizens and business are not able to envision the land as wild and wish only to see it for the profit they can take. As I wander the mountains of Idaho, it is clear to me from areas that have been clear cut by logging companies and mines that have been left behind and still are intact are simply the result of companies seeking immediate profits and not companies that peer into the future to realize that others may choose to use the land. It is obvious to me that businesses and profit takers cannot legislate themselves for an outcome that would benefit all society. (Individual, Boise, ID - #9730.41000)

ESTUARIES AND WETLANDS

Please continue to set aside roadless and wilderness areas, including estuaries and wetlands. (Individual, San Diego, CA - #8824.64411)

Public Concern: The Forest Service should quickly assess lands which qualify as wilderness.

I urge you to more quickly assess lands in your jurisdiction that qualify as wilderness so they are [not] developed while awaiting assessment. (Individual, Ithaca, NY - #7538.64411)

Public Concern: The Forest Service should designate wilderness areas in response to population increases.

I...think the area of national parks and wilderness should increase as the population does. At this point, I think we are in a position where we need more, not fewer areas where we can 'get away from it all.' (Individual, Mc Kees Rocks, PA - #3389.64411)

Public Concern: The Forest Service should use watershed boundaries to delineate roadless areas.

The rules should provide guidelines and policies that would require that forest plans be based on principal river and tributary drainage areas rather than existing political boundaries. (Individual, Minnetonka, MN - #44235.64251)

Public Concern: The Forest Service should clarify whether stewardship activities and temporary roads would disqualify an area from potential wilderness designation.

The suggestion that stewardship logging be allowed in certain roadless areas and that temporary roads be built into these roadless areas to allow stewardship logging has raised the concern that these activities may disqualify the roadless areas from potential wilderness designation. This subject should be discussed in the Final EIS, but presumably these activities would not disqualify the roadless areas from this potential designation. Limited roading activity and logging in the past has apparently not disqualified such areas, as described at page A-9 of the DEIS Summary and proposed rule. (State Elected Official, Salem, OR - #18661.64411)

Public Concern: The Forest Service should consider designations other than wilderness.

I like the idea of protection without necessarily designating an area as wilderness, because that leaves the areas open to a greater variety of possible recreation, such as mountain biking. (Individual, Helena, MT - #9711.10100)

Public Concern: The Final EIS should recommend to the President that all roadless areas be designated national monuments.

The final EIS should recommend to the President that all roadless areas—including the ones the inventory purposely ignored and those on the Tongass National Forest—be designated National Monuments without logging, road building, mining claims, mineral leases, grazing or motorized and mechanized vehicles. The other citizens of the nation, grizzly, wolverine, bull trout, and salmon, deserve the few remaining wildlands. That is their home. (Individual, No Address, - #14717.64150)

Public Concern: The Forest Service should postpone the wilderness recommendation process until the next round of forest plan revisions.

If a re-evaluation of inventoried roadless areas and unroaded areas is to be required in the upcoming Forest Plan revision, then I recommend that the required wilderness recommendation process be postponed until the next round of Forest Plan revision (15 years hence). This is because it would be too confusing and overwhelming to do both along with trying to evaluate ecological systems. (Individual, Libby, MT - #16714.64250)

Public Concern: The Forest Service should not attempt to designate any more wilderness areas.

I urge you to support no more wilderness designation and urge President Clinton not to issue any further decrees that would restrict access of public lands to the citizens of America. (Individual, Las Vegas, NV - #926.64412)

Already, one third of U.S. forest land, 247 million acres, is permanently set aside in national forests, wilderness and other areas never to be harvested. More “Wilderness Areas” reduces the amount of land available for multiple use and lessens the public access to recreation, wood and other resources. (Business, Ewen, MI - #949.64412)