

## Chapter 6 Human Uses and National Forest System Land Management

This chapter presents the range of public comment discussing human uses of the national forests, and roadless areas in particular. Given that the Notice of Intent proposed possible restrictions on “all activities . . . that do not contribute to maintaining or enhancing the ecological values of roadless areas,” and that the set of action alternatives analyzed in the Draft Environmental Impact Statement (EIS) are prohibitory in nature, almost every response to the Draft EIS addresses human uses of national forests in some way.

A great many people who generally favor a roadless conservation rule feel that the Preferred Alternative does not meet the mandate of the president or the purpose described in the Notice of Intent. These respondents request a wide array of further restrictions, especially in regards to timber harvest, mining activities, and motorized recreation. They feel that both ecosystem health and roadless values are unacceptably compromised because the proposed rule does not directly address commodity and recreational activities.

Opponents to the proposed rule feel that broad multiple use management should be practiced in roadless areas and does not harm the environment. Current management of the national forests provides ample opportunity for addressing management of roadless areas and threats to the ecological health of roadless areas are greatly exaggerated, many say. A wide variety of recreationists and commercial users feel their use of the forests will be unreasonably restricted by the proposed rule or by the likely restrictions they believe will follow thereafter.

These concerns are elaborated in the following sections of this chapter: 6.1 General Management Considerations, 6.2 Travelway Infrastructure Management, 6.3 Commodity, Extractive and Commercial Activities, 6.4 Wildlife-Dependent Activities, 6.5 Non-Timber Forest Products, 6.6 Cultural and Heritage Resources, 6.7 Recreation and Travel Management, and 6.8 Land Ownership.

Related concerns specifically addressing the alternatives are found in Chapter 4; concerns that focus on specific environmental impacts of various human uses are found in Chapter 5.

### 6.1 General Management Considerations

Many individuals express the strong sentiment that as taxpaying citizens, they have a right to enjoy the national forests as they see fit without excessive government interference. “The people own the land, not the Forest Service. We have the right to use it, all of it, for our living needs,” contends one individual. Conversely, another respondent points out that individuals by law cannot simply do anything they wish with federal property. “I cannot, as a citizen of this country, go into any federal office and begin commandeering people’s staplers, copy paper, and desk chairs just because ‘It’s my money.’” This principal applies equally to National Forest System lands, this respondent reasons.

While some writers express resentment toward any use restrictions, most people do support the idea that the Forest Service should focus management on achievement of a fair balance of uses while minimizing damage to the environment. However, there is clearly little consensus on what level and mix of uses is appropriate. This issue lies at the heart of conflicts over appropriate multiple uses of National Forest System lands: determination of which uses of forest resources “best meet the needs of the American people . . . without impairment of the productivity of the land” (Multiple Use Sustained Yield Act of 1960). Opponents feel that forest management has already moved too far toward environmental protection, and that the Forest Service should return to full multiple use management and increased timber harvest levels. Most proponents of a roadless rule feel that the Forest Service should adhere to the president’s mandate by restricting all commercial, non-commercial, and recreational activities that threaten the health and integrity of roadless ecosystems. Limiting prohibitions to road building and reconstruction may hamper some uses, they conclude, but given human ingenuity and rapid technological advances, all detrimental uses should be directly prohibited.

One individual feels that the Forest Service should increase restrictions on companies that extract natural resources from roadless areas to encourage greater efficiency. “I believe there are two options,” this writer postulates: “A) we can allow companies to expand into wilderness areas. B) we can protect the resources we have, thereby making companies work smarter . . . . It is my opinion that Option ‘B’ is in the best interest of everyone, including the companies who want to use our nation’s resources. We save our resources and compel companies to become more efficient. In the end, we all win.” One individual states that since commodity production does occur on national forests, the best management practices for timber harvest, road construction, and mining should be consistently implemented and evaluated for effectiveness.

Finally, most proponents of a roadless rule assert that the Forest Service should include the Tongass National Forest in logging and road building restrictions to prevent irremediable damage to soils, wildlife, and the tourism and subsistence economies that depend upon them.

Chapter 1 also contains concerns about the purpose and need for the proposed rule, and a diversity of opinions on the proper use of National Forest System lands. Most concerns regarding exemption of the Tongass are found in Chapters 4 and 5.

### **Public Concern: The Forest Service should clarify whether citizens have the right to treat federal lands as their private property.**

You are trying to “lead” the public with false statements. The people own the land not the Forest Service. We have the right to use it, all of it, for our living needs. (Individual, Goleta, CA - #7088.91700)

I cannot, as a citizen of this country, go into any federal office and begin commandeering people’s staplers, copy paper, and desk chairs just because “It’s my money.” Nor can I go onto federal land and clear it for growing flowers for profit. AND even if I could, with the right permit, do these things, I would hope that I and those who issue the permit would keep a close eye on the condition I leave the land in, and whether or not my activities enhance the land for our society in the long run. (Individual, No Address - #1769.90000)

There is a more fundamental issue un-addressed in the DEIS which is at play here. The issue concerns the American public's property rights with respect to Public Lands. First, let me state that public lands is a private property right held collectively by the public. All the public. Not the government, nor the UN via their "Biospheres" or their "World Heritage Sites." (Individual, No Address - #52489.90000)

Ranchers who lock off tracts of land for their private use, bird watchers who think it's their forest only, and other special interest groups have no right to deny the general public use of our public forests. (Individual, Tucson, AZ - #2753.91500)

**Public Concern: The Forest Service should focus management on achievement of a fair balance of uses while minimizing damage to the environment.**

As a lifelong Oregon resident, I live in the mountains and use the national forests for many recreational activities. From hiking, to fishing, to motorcycle riding. The number one cause of damage to the forests that I see here, is mismanagement of the forest. There are people in every category that abuse it, from off-road vehicles, to hikers cutting trails, and burning, and leaving trash. Adding this much MORE roadless area will not solve the problem. (Business/Business Association, No Address - #8.71220)

The USFS has to demonstrate that they can manage lands in a cost effective manner. Manage them so that wildlife and fish can survive. Manage the national forests so that recreation, beauty, watershed viability, diversity and so on are compatible with resource extraction. Failure to do so will almost surely result in the success of those environmental organizations calling for a complete halt to commercial logging and grazing on federal lands. (Individual, No Address - #5254.83000)

How can we expect emerging nations to protect their land, when we display the exact opposite in behavior? Our natural resources should be managed better than this. (Individual, Venice, CA - #1720.71230)

The highest and best public use of remaining roadless public lands within Lewis and Clark County is to manage for their traditional backcountry uses and values of clean water, fish and wildlife habitats, grazing and outdoor recreation. The proposed policy should encourage local forest officials to do so, in collaboration with county residents, elected officials and area businesses. (County Agency, Helena, MT - #10109.83000)

**Public Concern: The Forest Service should restrict all commercial and recreational activities that threaten the health and integrity of the ecosystem.**

The public is legitimately concerned about road-building, logging, mining, and other destructive practices in our last undeveloped national forest tracts. (Individual, Charlottesville, VA - #1672.80000)

[One] person commented that "Mining, timber and logging were conducted for generations successfully without significant degradation to the environment." One must wonder what the person was speaking of when he or she said that there has not been significant degradation to the environment. They must be ignoring the fact that countless plant and animal species have become extinct or endangered because of extractive industries that have decimated our forests. They must be turning a blind eye to the siltation of streams from logging, and the pollution of streams from mining operations with heavy metals and toxins too numerous to mention. They must not have heard that 95-97% of our original forests have been destroyed, and that many forests that we have now are monocultures, that do not hold a candle to the biologically diverse places they need replaced. (Environmental/Preservation Organization, No Address - #1826.80000)

The vast majority of the national forests in this country have already been destroyed or severely degraded by roadbuilding, logging, and various forms of motorized transportation and recreation. These forests belong to the

people and should serve the interests of the people, not of the logging industry or other commercial interests. (Individual, Cottage Grove, OR - #1056.80000)

I find it disturbing that we have so exploited our public lands, eliminated some large animals, and in general pushed aside parts of nature we find inconvenient or unprofitable. I oppose the killing of predators: I prefer to compensate ranchers for verified stock losses. Likewise, we have enough tree farm land in the southern U.S. in private hands to supply us with lumber, so I do not like the cutting of slow-growing timber in the west. (Individual, Irving, TX - #3531.81000)

While the draft plan would prohibit road building in roadless areas, it still allows logging in these areas. Timber companies are very adept at logging in roadless areas using helicopters, skid trails and other creative methods. Allowing logging in these areas, even while prohibiting roads, will not provide any real protection for the last of our wild forests. (Individual, No Address - #841.83000)

In so many areas of both the National Forests and BLM lands we say that a very limited water source had been dammed to serve one or a few local farms and therefore changing the whole ecosystem of the area just below the dam. We have seen over the many years of camping [in] the forests that the roads are there only to serve the destructive logging industry, creating lifeless land where there once was an abundance of birds and animals. So many of our forests are now silent. (Individual, Cambria, CA - #3424.81000)

Ranchers have been getting grazing rights in the national forests, on the cheap, for a long time. It is about time they pay attention to the wishes of the majority of Americans who want some wild places and wild life to flourish. (Individual, Strasburg, ND - #1680.80000)

Withdraw all roadless areas from mining. Eliminate all grazing permits in roadless areas to reduce fire hazard. These steps will go far toward protecting watershed values, which will become a crucial issue in the not distant future. (Preservation/Conservation Organization, Sebastopol, CA - #9202.83100)

The purpose of eliminating roads was to minimize the erosion, disruption, watershed damage, weed proliferation and associated bad effects. I don't know what it is like in the forests you frequent, but in the ones I go to the ORVs create their own 'roads' and with them come all the negative effects. (Individual, Spokane, WA - #99224.83000)

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

**Public Concern: The Forest Service should increase restrictions on companies that extract natural resources from roadless areas to encourage greater efficiency.**

I believe there are two options: A) we can allow companies to expand into wilderness areas. B) we can protect the resources we have, thereby making companies work smarter. If we choose Option "A," we are putting off the inevitable. At some point in time, the wilderness resources will be depleted and businesses will need to rethink their options, or they will go under. If we choose Option "B," the companies and their employees may fuss and fume, but responsive management will immediately look at ways to work more efficiently. It is my opinion that Option "B" is in the best interest of everyone, including the companies who want to use our nation's resources. We save our resources and compel companies to become more efficient. In the end, we all win. Additionally, we need to ask if Option "A" is fair to the public. I think not. A few companies make money, but does our nation as a whole benefit? I don't think so. (Individual, No Address - #13763.83000)

**Public Concern: Best management practices for timber harvest, road construction, and mining should be consistently implemented and evaluated for effectiveness.**

BMP's for timber, road and mining are designed to allow management while protecting water quality. However, BMP's need to be implemented and evaluated for effectiveness. Increase review of BMP's in planning documents and in the field administration. This is one recommendation I would add to Alternative 1 in roadless areas. (Individual, Willows, CA - #18336.84500)

**Public Concern: The Forest Service should include the Tongass National Forest in logging and road building restrictions to prevent irremediable damage to soils, wildlife, and the tourism and subsistence economies which depend upon them.**

The town of Tenakee Spring's tourism industry will be harmed by the logging and then by the long term adverse effects of the road construction. We have all seen aerial photographs of tire tracks in the tundra. It is more difficult to see the tracks in the Tongass but they are there across the karst formations. They are there in the encounters between the Tongass brown bears and humans that are increased with more roads. The bears are never the real winners in those confrontations.

If we wait to include the Tongass miles and miles of new roads will be constructed in Tenakee Inlet. Deer populations will lose more and more winter protection from old growth habitat. Brown bear populations will lose the range they need for survival. Fish stocks will be damaged by the lack of repair or closing of roads that cross fish streams. The karst, the underlying geologic formation, that can make the whole ecosystem possible will continue to be damaged with no hope of repair or remediation. (Individual, Tenakee Springs, AK - #8123.83000)

You have ignored critical social and economic assets of non-motorized recreation, tourism, fisheries, subsistence use, wildlife habitat and watershed values in your Preferred Alternatives in the Tongass National Forest. These are the issues Americans want you to address. By law you must address them. Instead you've concentrated your Preferred Alternative on perpetuating one outdated single use for the Tongass public land and it's called welfare logging. Fishermen, subsistence users, recreation and tourism businesses know that they cannot survive another four years of welfare logging roads in our roadless areas. (Individual, Ward Cove, AK - #23836.90010)

There are many non-consumptive uses of the Tongass that do not require roads for access; those activities (visitor industry, eco-tourism, fishing, hiking) should be emphasized. (Individual, No Address - #6324.90000)

KIC Tribal Council would like to see Gravina Island remain a roadless area for the following reasons: Historically, and currently it is still used by Alaska Native people from the Ketchikan area for subsistence fishing, gathering and hunting. The Saxman people use it and they have Rural status. All of the proposed or possible activities would jeopardize the subsistence areas on Gravina, especially Bostwick Inlet. (Tribal Government, Ketchikan, AK - #13987.90400)

I am a subsistence hunter in the Tongass and I feel that the vast number of logging roads has caused a decline in the deer population due to increased human access and hunting pressure. More and more deer poaching takes place as more and more roads are built. Bear populations are suffering wherever new roads are put in. (Individual, Sitka, AK - #19748.90400)

## 6.2 Travelway Infrastructure Management

Given that the Preferred Alternative prohibits only road construction and reconstruction, a plurality of respondents address the topic of management of the Forest Service travelway system. Access to roadless forest resources, whether commodity or non-commodity, is inextricably linked to the road and trail system for most respondents. Many businesses assert that the ban on road construction will effectively prevent their access to timber and mineral resources in roadless areas. Among those who address recreational access, many people feel that the proposed rule will effectively shut down all access to the national forests. Others challenge this notion, noting that hundreds of thousands of miles of forest roads on the roaded portions of the national forests will not be affected by the rule. Many feel that the existing road system is quite sufficient for access, and that various loopholes and exceptions should be removed in order to provide lasting protection.

Public concerns in this section are subdivided as follows: 6.2.1 General Management Direction, 6.2.2 Road Construction, Reconstruction and Maintenance, 6.2.3 Exceptions to the Road Building Prohibition, 6.2.4 Road Decommissioning and Removal, 6.2.5 Trail System Management, and 6.2.6, Ways.

### 6.2.1 General Management Direction

The Forest Service should refocus forest travelway system management on the needs of all users rather than just those of the commercial timber industry, say many individuals both in favor of and opposed to the rule. Some feel that the non-timber forest products (NTFP) industry can provide a more sustainable alternative than commercial timber, and that its access needs are different. “NTFP extraction requires various types of access paths ranging from simple trails to industrial roads. In most cases NTFPs do not require the type of heavy equipment road that typifies the majority built on our public forests.” A great number of respondents feel that recreational uses of all kinds are the growth industry of the future, and that the road and trail system should be redesigned to meet the needs of these users. Many agree that the Forest Service should streamline the current road system by maintaining arterial roads while closing smaller peripheral routes and unused logging roads. One state agency agrees that reducing road densities is a laudable goal and should be pursued on a forest-by-forest basis through the forest planning process. A county agency suggests that the Forest Service work collaboratively to develop strategic travel management plans for national forests. An individual professes opposition to and change in status of forest roads from unclassified to classified. One county agency requests that the Forest Service provide management direction for “Public Roads” mentioned in the Roads Management Policy that are controlled by counties.

A great many others, however, feel that the negative effects of roads have been overstated and remain unproven. They request that the Final EIS enumerate and quantify the impacts of road system management on roadless ecosystems, both for the existing road system and for future road construction and reconstruction. One respondent asks the Forest Service to consider the cumulative effects of road construction in Alaska. Another individual maintains

that the final EIS should identify all projects affected by the road building moratorium and that the agency should better elaborate on the need for the proposed rule by quantifying how some threshold has been crossed to make further road building unacceptable. A state agency feels that the DEIS incorrectly presents the need for the rule by basing its effects analysis on impacts of permanent roads. “Most of the roads currently found in Inventoried Roadless Areas (IRA) are temporary and/or closed to public access. The impact of temporary or roads closed to public travel is significantly different than those used to describe and justify the conclusions reached in this document,” this agency states.

**Public Concern: The Forest Service should refocus forest travelway system management on the needs of all users rather than those of the commercial timber industry.**

**NON-TIMBER FOREST PRODUCTS INDUSTRY**

The concern is that a major stakeholder may be left out [of] the road building deliberations the Forest Service is currently undertaking. The stakeholder(s) in question are entities within the commercial and non-commercial non-timber forest product’s (NTFP) sector in this country. NTFPs are forest resources such as mushrooms, truffles, boughs, cones, botanicals for medicine, berries, beargrass, and maple syrup. Including medicinals, the NTFP wholesale sector is a multibillion dollar a year economy. As the Forest Service and other agencies grapple with ecosystem management NTFPs have only been minimally considered, and largely misunderstood. NTFPs, as many countries already have learned, represent an opportunity to manage the forest for increased biodiversity and forest health. NTFPs do not preclude selective timber extraction and are compatible with the emerging knowledge of fire ecology and restoration.

NTFP extraction requires various types of access paths ranging from simple trails to industrial roads. In most cases NTFPs do not require the type of heavy equipment road that typifies the majority built on our public forests. Effective NTFP extraction and ecosystem management needs could likely be carried out on 20% of the existing road infrastructure, but with old roads being modified to a range of levels from those for small vehicles, to ATVs to horses, to bicycles, and to foot trails. New access ways could be built into existing roadless areas that would allow for NTFP extraction, but without damaging the ecosystem. Existing Federal road subsidies could be reduced and made available for the construction, alteration, and maintenance of simple, low impact roads and trails.

With greater emphasis on NTFPs the forests will become healthier and visually more appealing because of their diversity. Management for NTFPs will result in economic diversity and yields that will far exceed anything seen under the timber management approach.

Recommendation: Alter the President’s proposed ban on new road building to allow for maintenance and construction of simple, low impact roads and trails that are compatible with the needs of non-timber forest product commercial and non-commercial harvesting. (Individual, Portland, OR - #5735.93400)

**RECREATIONAL USERS**

I do endorse a policy of thoughtfully designed construction...In the future build roads with consideration to impacts on both nature and the users. Do not build too many roads in or into an area. Build the road to make the beauty viewable or accessible with a relatively short hike, not a weeklong trek. Currently roads seem to me to be built only with considerations for most economic forest harvesting. I agree that this should be changed. (Individual, No Address - #2318.71300)

If any roads are to be built, they should be small recreational roads only. There are multiple advantages of the Roadless Areas Initiative, one of which is to preserve the public recreational aspects of the national forests. Thus, it would seem permissible to permit small scenic roads into a forest for the purposes of scenic recreation, non-intrusive travel and scientific study. This does have an advantage of permitting some access for those who

might not have the physical ability or the available time to visit such areas. (Business, Birmingham, AL - #26844.60000)

We require that the taxpayers have expanded access to the forest lands, with new roads for our SUV and camping public. (Individual, Goleta, CA - #7088.91700)

Our families work and live in the Bitterroot largely because of a road system's access for weekend recreational activities throughout the year. The opportunity to wisely expand that system would further expand the chance for a quality recreational visit throughout the forest. (Business/Business Association, Hamilton, MT - #7251.10212)

A major generally unspoken, objective of the no-road champions is to prevent logging. It's overlooked that not all national forest roads are built, nor should they be built, solely for access to areas prescribed for timber management. As roads provide access to and through national parks, wildlife refuges, and other preserves for the purpose of affording the public the means and opportunity to experience and learn about those areas, so should they in select situations serve the same purpose on national forests. A well designed road can be a beautiful feature of an otherwise wildland area. (Individual, Juneau, AK - #8099.93300)

**Public Concern: The Forest Service should streamline the road system by maintaining arterial roads while closing smaller peripheral routes and logging roads.**

Look at present usage of wilderness country. Some, the more inaccessible parts, are virtually unused. The more accessible parts along the edges get hammered. Close all roads in national forests and the same thing will occur; all use will be at the edges with high impact. Americans need recreation room. Keep open and maintain arterial roads throughout the national forests. Close smaller feeder routes and skid trails. This gives wildlife privacy and escape from humans. Open arterial roads gives humans access to the whole of the forest rather than just the edges, and room away from each other, and spreads the impact of usage to acceptable levels. (Individual, Millville, CA - #19985.91500)

I and many others suggest NO NEW ROAD CONSTRUCTION and abandonment of ALL PERIPHERAL ROADS. (Individual, Tunbridge, VT - #944.63000)

**Public Concern: The Forest Service should reduce road densities on a forest-by-forest basis through the forest planning process.**

The Council believes reducing the number and density of roads open to public vehicular travel is a positive goal and should be pursued on a forest-by-forest basis during the planning process. (State Agency, Wisconsin Rapids, WI - #13980.71300)

**COLLABORATIVELY DEVELOP STRATEGIC TRAVEL MANAGEMENT PLANS**

Recommend that this roadless characteristics conservation planning process be carried out in a collaborative manner that includes: includes a final travel management plan that identifies the optimization strategy for the road network and lists the priority order in which roads will be closed and decommissioned. (County Elected Official, Eagle, CO - #15908.71300)

**Public Concern: The Forest Service should not classify currently unclassified roads.**

I am AGAINST classifying roads. Leave roads unclassified. (Individual, Tucson, AZ - #13839.71300)



**Public Concern: The Forest Service should provide management direction for “Public Roads.”**

We note that the proposed road rules included a reference to “Public Roads” which are in addition to the “classified” and “unclassified roads.” We suggest to avoid confusion and to be consistent with the companion rulemaking that the Proposed Rules also incorporate management direction for these “Public Roads” which are under the jurisdiction of the local governments. (County Agency, John Day, OR - #16087.32100)

**Public Concern: The Forest Service should enumerate and quantify the foreseeable impacts of road system management on roadless ecosystems.**

**EXISTING ROAD SYSTEM**

No data is presented to support the assertion that the existing road system is having a significant negative affect on the environment or to quantify that impact. (Individual, Salt Lake City, UT - 13258.82000)

The impact of primitive, dirt roads on an undeveloped area is hugely overstated. Viewed from above, a dirt road takes up almost no area, however, the viewers tend to be on that road, therefore get a distorted view. Often the road is not even perceptible 20 yards into the woods. Erosion can be an issue, but once again, it must be quantified on the basis of the entire area, not by someone walking down the road, with that as their only view. (Individual, No Address - #7649.83200)

Roads are not necessarily hard on watersheds. Properly designed, roads put almost no increase in sedimentation or risk on watersheds. Properly designed, roads need almost no maintenance. (Individual, No Address - #848.83100)

Every proposed roadless characteristic says roadless areas are more likely to have or not have something, but there is no substantiating documentation that specifically identifies a road as the reason for this to be more likely to occur or not occur. Item (4) there is no documentation that areas without a road function better “as biological strongholds and refuges for many species.” A road has not been documented to reduce the ability to “maintain native species viability and biodiversity.” If you are in fact referring to uses of the land or road you need to define what uses and specifically what effects they have. If your rule is referring to uses and not roads, the proper term for this rule is use not roads and the real word useless not the derived word roadless. It should be renamed “Useless conservation initiative” to properly identify what your effects analysis is referring to. (Timber Association, No Address - #52501.71300)

**ROAD CONSTRUCTION AND RECONSTRUCTION, GENERAL**

At a very minimum, the effects analysis should include variables, such as average expected stream crossings and culverts required per mile of road constructed or reconstructed. This would at least provide the reader a sense of how the alternatives differ and their potential adverse impacts. On a national average, how many miles of road are required per million board feet of timber harvested? How is the reader expected to evaluate the discussion and comment when this information is not disclosed?

Relief: The Forest Service must provide a quantitative evaluation of the effects and consider applying the data on “miles of road/million board feet” of timber harvested. (County Elected Officials, Worland, WY - #16185.93300)

I believe that many of your concerns regarding environmental damage resulting from road construction are overstated. Current road engineering and construction techniques can greatly reduce these fears if roads are properly designed in the first place. (Town or Municipality Elected Official, Deer River, MN - #11235.71300)

## CUMULATIVE EFFECTS OF ROAD CONSTRUCTION IN ALASKA

Even if the allowable buffer for road development in the Chugach was expanded to five miles to allow for future dispersed recreation opportunities, the forest would still be approximately 80% in the unroaded category. Furthermore, additional road development is not likely to occur at a significant pace given the lack of marketable timber and natural topography constraints. In fact, in my 20 years on the Glacier Ranger District, I can only remember one new road for a total new construction of just over 1 mile in 20 years. The DEIS fails to track the cumulative effects of development of roads on the Chugach in the “past, present, and foreseeable future” as required by NEPA for an appropriate analysis. Therefore the Forest Service does not know or identify the rate of change of terrain on the Chugach National Forest from non-roaded to roaded status. My guess is that this rate of change is extremely low and does not present a current threat to even an additional 1% of the Chugach National Forest. (Business, Girdwood, AK - #52944.70000)

### **Public Concern: The final EIS should identify all projects affected by the road building moratorium and better elaborate on the need for the proposed rule.**

Very few new roads were proposed in the Roadless areas, or the so-called Unclassified Road areas. How many new roads and road reconstruction projects were actually proposed and impacted by the roadless moratorium and where are these roads actually located and will you clearly and fully disclose this valid information to the public in the final? Were the potential environmental impacts considered as part of the individual analysis for these new proposed roads and roads that were to be reconstructed? If so, were there specific mitigations included as part of these specific road projects and what were these site specific mitigations, (also will you meet the need to disclose this information in the final to the public, as it does [have] a real bearing on determining the cumulative impacts and the true need for the proposed alternatives)? Was the specific potential use of these specific proposed road projects the concern, or the existence of the potential roads the concern and are these concerns clearly quantified and distinguished in the earlier analysis and will this pertinent analysis be fully disclosed in the final? Did these road projects trigger exceeding some established level of tolerance of impact and/or a quantifiable threshold of concern and/or established contextual level of significance and will this...valid information be fully disclosed in the final if it is has been so established. (Individual, Sacramento, CA - #16567.71300)

### **Public Concern: The Forest Service should base its effects analysis on the impacts of temporary rather than permanent roads.**

The draft Environmental Impact Statement (EIS) has a critical flaw in the way it utilizes numerous studies involving the impact of roads on the various resources. In most cases the roads identified in the studies as having significant impacts are unrestricted access permanent year round graveled or paved roads. Most of the roads currently found in Inventoried Roadless Areas (IRA) are temporary and/or closed to public access. The impact of temporary or roads closed to public travel is significantly different than those used to describe and justify the conclusions reached in this document. (State Agency, Wisconsin Rapids, WI - #13980.82000)

## 6.2.2 Road Construction, Reconstruction, and Maintenance

Many respondents urge the Forest Service to implement the proposed prohibition on road construction and reconstruction. “With over 300,000 miles of roads for loggers, recreational vehicles and hunters how about keeping the rest of the wild areas wild? Just because we CAN build roads everywhere doesn’t mean we should,” ventures one respondent. Many proponents assert that the Forest Service should prohibit road construction and reconstruction in all portions of roadless areas, including the “roaded” sections (see also Chapter 4). Many

reasons are given in support of a prohibition on road building, including prevention of adverse impacts to the ecosystem caused by greater public access. Some worry about increased poaching of plants and wildlife, while others challenge this claim. Some people request that the Forest Service consider re-opening closed roads as an alternative to building new ones. One writer recommends that the final rule should assure no net gain of road miles by requiring removal of equal road mileage for every special exemption. One concerned citizen requests that the Forest Service halt reconstruction on the Loop Road in Fremont County, Wyoming in response to this rulemaking.

The final rule should allow stabilization but not full reconstruction of badly deteriorated roads, proposes an environmental organization. Some respondents would like the final rule to prohibit temporary roads from being built. Others disagree, requesting that the Forest Service allow temporary roads as long as they are built to minimum standards, promptly removed and revegetated, and paid for entirely by the timber purchaser. Others feel that temporary roads should be permitted for salvage harvest. Some ask the Forest Service to reassess the assumption in the Draft EIS that logging roads built into roadless areas would remain open to the public. Instead, some assert, roads built for logging and maintenance should be made off limits to the general public by means of barriers and gates. For any road building that does occur, individuals request more stringent road building standards be implemented, especially to protect salmon fisheries and the fishing industry. Another person suggests that funding should be linked in any timber sale plan to assure stricter road building standards are followed. Many feel that current road building standards are quite adequate to protect ecosystems, and that the Forest Service should explain to the public how these best management practices minimize environmental impacts. One individual recommends that the Forest Service switch to the use of plastic culverts for road projects where feasible to reduce long term maintenance needs and costs.

Some respondents ask the Forest Service to clarify whether the final rule will prohibit road maintenance in inventoried roadless areas, as opposed to reconstruction. Furthermore, a few individuals request that the Forest Service revise guidelines for road maintenance and reconstruction to ensure that existing roads are preserved in useful condition. The Forest Service should delete the reference to road maintenance on page 1-4 of the Draft EIS or address maintenance as part of an alternative, recommends a county elected official. Others suggest that it would be more appropriate for the Forest Service to address road construction and road reconstruction separately in the final rule.

Many people question what distance of buffer will be established between a classified road and a designated roadless area in the final rule. The Forest Service should reconsider the buffer width between existing roads and roadless areas, they feel. Some suggest alternative buffer widths, such as one-half or one-quarter mile. Others request that rather than an arbitrary buffer width, buffers should be clearly defined and ecologically justified by the Forest Service. "The final rule should give guidelines regarding road buffers. Because road buffers define the boundary of a 'roadless area,' they often exclude areas of land that are truly roadless," asserts one respondent. The issue of setback zones from roads is of particular concern to many state and county departments of transportation because they own and are responsible for many roads that traverse National Forest System lands. Therefore, some

request that the Forest Service clarify whether there will be a setback between roadless areas and adjacent state highways that would allow for road reconstruction. Others conclude that the final rule should expressly permit road construction, realignment and reconstruction of federal and state highway systems. Finally, the final rule should be consistent with commitments made in the Environmental Streamlining National Memorandum of Understanding regarding expedited highway and transit projects, advises one state agency.

**Public Concern: The Forest Service should implement the proposed prohibition on road construction and reconstruction.**

I urge you to implement the proposed Roadless Area Conservation measure. I believe new road construction in roadless national forest areas should be prohibited, as should upgrades of existing roads in national forests to greater carrying capacity. (Individual, Santa Barbara, CA - #664.61200)

Roads have no analogy in Nature, and so should be built only as a last resort, and with great caution. (Individual, Moscow, ID - #7505.71300)

With over 300,000 miles of roads for loggers, recreational vehicles and hunters how about keeping the rest of the wild areas wild? Just because we CAN build roads everywhere doesn't mean we should. Knowing there are places that don't have the noise pollution caused by human machines assaulting us at every turn is most comforting. (Individual, Moscow, ID - #13495.10100)

I think taxpayers' money could be better spent maintaining the roads we have and not cutting new ones. (Individual, Portland, OR - #1087.93610)

As a taxpayer I am against the current use of vast taxpayer monies that are devoted to creation and maintenance of the existing road system in our national forests. It would be much better to devote taxpayer dollars to proper maintenance of our existing road systems so they can function properly for ecological and economic benefit. (Individual, Houghton, MI - #1342.93610)

The hundreds of thousands of miles of roads on our National Forests are certainly sufficient to provide access, recreation opportunities, and extractive resources. NEW ROADS MUST BE PROHIBITED IMMEDIATELY ON ALL NATIONAL FORESTS. (University/Professional Society, Gunnison, CO - #9680.71300)

**Public Concern: The Forest Service should prohibit road construction and reconstruction in all portions of inventoried roadless areas, including the "roaded" portions.**

I support prohibition of any road construction and reconstruction including temporary road construction in all portions of inventoried roadless areas, including the "roaded" sections. The "roads" in inventoried roadless areas are often trails or social routes, developed by both motorized and non-motorized recreational users who do not understand the damage roads can do to a native ecosystem. (Individual, Boulder, CO - #6755.71300)

Appendix B does not quantify what portion of the designated roadless areas qualify for protection under the proposed rule since there is nothing to indicate if these areas are unroaded. Only these areas that are unroaded inventoried roadless areas will be protected as presented in the DEIS. . . . Conceivably, there may be no lands in Minnesota, Michigan, Wisconsin, and Mississippi that satisfy the criteria since combined, the states have 106,000 acres of inventoried roadless area subject to roadbuilding. "Roadbuilding is allowed in the remaining 33.8 million acres of inventoried roadless areas subject to this rule. Within the total 54.3 million acres of inventoried roadless areas, an estimated 2.8 million acres have been roaded since they were inventoried (DEIS

p. S-34). Of all the lands [managed] by the Forest Service, these lands most need protection. (Environmental/Preservation Organization, Plymouth, MN - #51067.64424)

We advocate including all portions of inventoried roadless areas that still meet the criteria for roadless areas. East of the 100<sup>th</sup> meridian, roadless areas may contain up to ½ a mile of improved roads per 1000 acres and still qualify for the roadless inventory. If a road has been constructed in one of these roadless areas after the inventory was conducted but does not exceed the allowable road density, the area should not be removed from the inventoried area. Perimeter roads should not be included in determining areas to be excluded from inventoried roadless areas. (Environmental/Preservation Organization, Johnson City, TN - #52195.64424)

### **Public Concern: The Forest Service should end road building to prevent adverse impacts to the ecosystem caused by greater public access.**

Experience has demonstrated that when an access road is built, the surrounding forest is soon degraded. The degradation caused by logging is bad enough, but the added impact of unregulated human activity soon follows. Any visitor to the back forest roads is not only greeted by the sight of acres and acres of stumps, but also has to endure the eyesore of illicit garbage dumps, shooting pits, off-road vehicle tracks, and other acts of rudeness, vandalism, and criminality. (Individual, Troutpale, OR - #225.83000)

Roads mean increased access to sensitive wildlife habitat for poachers, and for vandals of archeological sites...More people in an area means more trash and more pollution. (Environmental/Preservation Organization, No Address - #1826.83000)

Enough is enough! Continued road building only means continued degradation of habitat through siltation of streams from runoff and fragmentation of critical areas to wildlife. More roads mean easy access by vehicles and people of all kinds, and a greater potential for exploitation of wildlife populations and the environment. (Individual, Craig, AK - #6415.83000)

#### **INCREASED POACHING OF PLANTS AND WILDLIFE**

What difference could roads possibly make in a wilderness, national forest, world heritage site, in any natural area? Aren't roads good? Roads are not 100% a bad thing, even the most hard-headed enviro must admit that. But roads open up natural areas to a whole herd of problems. They allow easy access for poachers of wild plants (American plants faced with extinction due to American poachers include American ginseng, Echinacea, Goldenseal, among a host of others) as well as poachers of wild animals. (Individual, Brooklyn, NY - #4557.80000)

I have witnessed mass destruction of the national forest on the Olympic Peninsula, as a result of clear cut logging operations, and massive poaching of Roosevelt Elk, as a result of logging roads running throughout the elk's habitat range, allowing unfettered access to them by poachers. (Individual, Airway Heights, WA - #8895.83530)

Roads fragment wildlife habitat, block or inhibit movement of small animals (even some large animals) and invertebrates and expose large animals to heavy hunting pressures, poaching, harassment and/or displacement as well as potential habituation (e.g., bears using roadside riparian habitat). (Individual, Cody, WY - #9386.83421)

### **Public Concern: The Forest Service should demonstrate the connection between poaching and road access.**

Just because the Wilderness Society alleges such a thing in its mailings regarding the Targhee NF doesn't make poaching a widespread threat. The Forest Service must fully study poaching rates and present tangible evidence

that poaching and roads are in fact interrelated sufficiently to impact game populations. (Individual, Whitefish, MT - #30417)

**Public Concern: The Forest Service should open existing roads rather build new roads.**

We have a cabin in the Swan Valley of Montana and enjoy hiking into the primitive roadless areas which are accessible to everyone. However as we go through the woods we see hundreds of roads that are blocked off by gates by private landowners (timber industry). Why can't existing roads such as these be opened to public use. Why do we need more roads when we are not using the ones we already have? (Individual, No Address - #6950.71300)

**Public Concern: The final rule should assure no net gain of road miles by requiring removal of equal road mileage for every special exemption.**

Some strategy should be developed for eliminating roads in areas which now have roads, to allow these areas to recover ecologically and to compensate for roads already built in Roadless areas and those which will be built under the special exemptions. If the goal is to maintain and enhance existing national forests there should be a concerted effort to assure a balanced relationship between roaded and roadless areas--not a constant elimination of roadless areas through special exemptions. What is lost to the roadless area should be restored from the roaded area in a way similar to the program for replacing wetlands. (Individual, Killington, VT - #27779.71300)

**Public Concern: The Forest Service should halt reconstruction on the Loop Road in Fremont County, Wyoming.**

[T]here is a Forest Service "road reconstruction project," known as the Loop Road in Fremont County, Wyoming, just outside the town of Lander. As a resident of this County as well as Salt Lake County, I would ask that the Loop road reconstruction be halted as part of the entire program of fewer roads. There are literally reams of citizen comment AGAINST the reconstructing on file in Denver. Now is clearly the time to pull out of this unwanted and controversial project in a graceful manner. (Individual, Salt Lake City, UT - #1101.71300)

**Public Concern: The final rule should allow stabilization but not full reconstruction of badly deteriorated roads.**

The definition of "road reconstruction" must be clarified to address the situation where a road has naturally deteriorated or revegetated to a point where major capital expenditure is needed just to bring the road back to its original capacity and design function. Such roads should not be allowed to be maintained or reconstructed except to stabilize them geomorphically and hydrologically so as to prevent adverse resource impacts. (Environmental/Preservation Organization, Eugene, OR - #55101.32000)

**Public Concern: The Forest Service should not allow temporary roads to be built.**

I urge you to create a sustainable plan that includes no new roads, even "temporary" ones. (Individual, No Address - #456.10110)

**Public Concern: The Forest Service should allow temporary roads for timber harvest as long as they are promptly closed.**

There is room for logging in the roadless areas as long as permanent roads are not constructed (management techniques are used to close off temporary roads immediately after their use for logging) and old growth forests or sensitive areas are not logged. (Individual, Smithville, NJ - #6471.61300)

**Public Concern: Roads associated with timber harvest projects should be built to minimum standards, restored to natural conditions upon completion of the project, and paid for by the timber purchaser.**

Timber is a renewable resource. Roads associated with timber harvest and fuel reduction projects should be constructed to minimum standards which provide for safe operations and environmental protection and should be paid for by the timber purchaser. Roads so constructed and not needed for future forest management should be “put to bed” at the close of activity. Timber purchasers should be required to chip or remove slash or deal with it in some other environmentally acceptable manner which will not increase fire hazard. Harvest selection should be targeted toward timber stand improvement and sustainable forestry. (Individual, Markleville, CA - #13284.71300)

Regarding the roadless area proposal, I believe that timber production should be permitted on a MANAGED basis. If roads need to be constructed to permit periodic harvest of timber--allow it, provided roadbeds are removed after harvest. (Individual, Bloomington, MN - #1876.63000)

**Public Concern: The Forest Service should allow temporary roads for salvage harvest.**

Temporary roads might be needed to access burned or bug killed stands. (Individual, Orofino, ID - #8512.71300)

**Public Concern: The Forest Service should reassess the assumption in the Draft EIS that logging roads built into a roadless areas would remain open to the public.**

The argument that “the F.S. can not maintain the roads it has, so why build new ones?” makes a great sound bite. But your figures of 1,444 miles of roads proposed within the next 5 years in roadless areas compared with the 386,000 miles of existing F.S. roads only constitutes 0.3 percent of the total road mileage. Your rates of decommissioning are about 2,000 miles per year, which far exceeds the proposed road construction in roadless areas. In addition timber purchasers are usually required to do deferred maintenance costs. The DEIS seems to assume that any road built into a roadless area will remain open to the public with the resulting impacts displayed in your analysis. The reality is that many of the proposed roads are single purpose roads which will be closed or decommissioned after use, thus minimizing the impacts that are displayed throughout the DEIS. (Individual, McCall, ID - #7575.93610)

In chapter 3, page 11, the Forest Service needs to define “irreversible loss of roadless character.” It is unclear why temporary roads would have this effect. This problem (misunderstanding or mischaracterization of the effects of temporary roads) occurs elsewhere in the DEIS. At a minimum the DEIS needs to discuss what a temporary road is, and how the term “temporary” means it is planned for closure/obliteration after project activities are completed. (Timber Association, No Address - #52501.71300)

**Public Concern: Roads built for logging and maintenance should be made off limits to the general public by means of barriers and gates.**

As for roads used for logging in our national forests, we trust the professional men and women of the US. Forest Service to make wise decisions about limited harvesting of trees for purposes of fire protection only. We are not, therefore, against the judicious use of a few judiciously placed roads for the purpose of limited logging and maintenance. But PLEASE MAKE THESE ROADS OFF-LIMITS TO THE GENERAL PUBLIC by means of barriers and gates. (Individual, Tempe, AZ - #941.21500)

**Public Concern: Stringent road building standards need to be implemented to protect salmon fisheries and the fishing industry.**

Salmon fishing is a valuable forest-dependent industry in Alaska and in some coastal communities has historically been the only industry. Sediment washed down from poorly managed forests can destroy estuaries, drown out crab and shrimp nurseries, lead to or exacerbate flooding or coastal areas, and kill salmon production entirely. Poor forestry practices in the past have stripped protective vegetation from salmon producing streams, elevated water temperatures to the point where salmon die, and channelized river systems so badly that they may take generations to naturally recover. In many cases, the health of forested watersheds determines the health of our near shore fisheries and the economic future of our communities. For this reason stringent road building standards need to be in place to maintain high quality fish and wildlife habitat. (Individual, Pelican, AK - #7179.83510)

**Public Concern: Funding should be linked in any timber sale plan to safeguard stricter road building standards.**

Funding [should be] linked in any timber sale plan to safeguard stricter logging standards set for road building. (Individual, Pelican, AK - #7179.83510)

**Public Concern: The Forest Service should explain how best management practices for road construction minimize environmental impacts.**

Pg. 3-15 last paragraph and again on pg 3-23 indicate that best management practices for road planning, design and construction can minimize adverse environmental impacts. Please define and quantify remaining impacts. Are these best management practices assumed in the baseline and the no-action alternative? If so, the roadless initiative would appear to provide only a slight marginal improvement (perhaps insignificant) in the ecological health of the same areas affected by this proposal. Following the same logic, decommissioning efforts have a far greater impact on Forest Health than this proposal. (County Elected Official, Battle Mountain, NV - #43985.33300)

**Public Concern: The Forest Service should consider the use of plastic culverts for road projects.**

Pertaining to road maintenance & building perhaps plastic culverts should be used whenever the design would permit. This would extend the life expectancy of the culvert & save money in the long term. (Individual, Ewen, MI - #10576.71300)



**Public Concern: The Forest Service should clarify whether the final rule will prohibit road maintenance in inventoried roadless areas.**

I cannot tell specifically if the roadless proposal also will prohibit road maintenance in “inventoried roadless areas,” whether heavy maintenance or light. (Individual, Clayton, GA - #2802.33200)

**Public Concern: The Forest Service should revise guidelines for maintenance and reconstruction to ensure that existing roads are preserved in useful condition.**

Although the proposal states that it does not call for closing any existing roads the provisions for road maintenance and re-construction amount to a slow closure of many roads located in or near roadless areas. Guidelines for maintenance and reconstruction need to be revised so as to ensure that existing roads are preserved in useful condition. (Business/Business Association, Lewiston, ID - #14715.90000)

**Public Concern: The Forest Service should delete the reference to road maintenance on page 1-4 of the Draft EIS or address maintenance as part of an alternative.**

Comment: Page 1-4, 4th paragraph--This reference to road maintenance is not germane to the discussion regarding the purpose for preserving roadless areas. This is a separate and distinct issue that could be managed if the Forest Service would prioritize funding and use of its resources (meaning people and funds). Although it is brought up many times as an issue, it is not addressed in any alternative.

Relief: The Forest Service needs to address this issue by deleting the reference to road maintenance or address it as part of an alternative. (County Elected Official, Worland, WY - #16185.93610)

**Public Concern: The Forest Service should consider road construction and road reconstruction separately.**

Prohibiting new road construction is one thing, prohibiting road reconstruction is another. You have lumped two ideas together which should be considered as individual proposals. (Individual, No Address - #2271.61300)

**Public Concern: The Forest Service should reconsider the buffer width between existing roads and roadless areas.**

One way to address this demand and still protect the roadless characteristics of these areas is to widen the buffer area of existing roads. While we could not find a specific reference to the buffer size, we feel that a minimum of one half mile on each side of the road would allow the local Forest Manager the latitude to plan for recreation and other uses which are road dependent. (County Elected Official, Winnemucca, NV - #13558.63000)

There should be clarification of what area is included around any road that has been constructed. The criteria for determining the excluded area should be consistent among forests. We suggest a distance of ¼ mile either side of a classified road. (Environmental/Preservation Organization, Johnson City, TN - #52195.71300)

**Public Concern: Road buffers should be clearly defined and ecologically justified by the Forest Service.**

The purpose of a road buffer must be clearly defined and ecologically justified. Varying distances of road buffers (from zero feet to 0.5 mile[s]) have been drawn around roads by the Forest Service, defining the roadless area boundary some distance away from the road. There does not appear to be a consistent distance or justification for these buffers from forest to forest. The final rule should give guidelines regarding road buffers. Because road buffers define the boundary of a “roadless area,” they often exclude areas of land that are truly roadless. The 0.5 mile buffer is a subjective length, and excludes the outermost portion of the roadless areas. The Coronado National Forest Plan states that you are not allowed to drive off a road more than 100 yards, yet the road buffer is 0.5 miles out from the road. This sends a mixed message to off-road vehicle users, and leaves significant tracts of roadless area unprotected from off-road vehicle use and other environmentally damaging activities. (Environmental/Preservation Organization, Albuquerque, NM - #43737.91600)

**Public Concern: The Forest Service should clarify whether there will be a setback between roadless areas and adjacent state highways that would allow for road reconstruction.**

Some of the roadless areas abut state highways. The highways may need to be widened or realigned. Will this be allowed? Do the roadless areas have a specific setback from the edge of a highway or do they extend to the edge of the pavement? (Individual, No Address - #397.71120)

**Public Concern: The final rule should permit road construction, realignment, and reconstruction of federal and state highway systems.**

UDOT requests that for all alternatives studied in the DEIS, existing corridors that serve U.S. and State Routes in Utah be designated as areas that allow road construction or reconstruction. (State Agency, Salt Lake City, UT - #13556.64350)

We believe the construction and maintenance of public highways should be exempt from this proposed regulation. The Virginia Department of Transportation (VDOT) is responsible for maintaining a statewide transportation system, and this rulemaking would seriously jeopardize our responsibility. Furthermore, the NOI maintains that “road construction increases the risk of erosion, landslides, and slope failure, endangering the health of entire watersheds that provide drinking water to millions of Americans and critical habitat for fish and wildlife.” The construction of all state-maintained roads in Virginia adheres to erosion and sediment specifications approved by the Virginia Department of Conservation and Recreation. In addition, all VDOT roads are constructed in accordance with all environmental laws and regulations including the Clean Water Act and Endangered Species Act. Therefore, the above environmental concerns are already addressed on VDOT projects. (State Agency, Richmond, VA - #87.64350)

Please be advised that Riverside County [CA] is currently involved in a comprehensive planning program known as the Riverside County Integrated Project (RCIP). This project combines the elements of land use planning with multi-species habitat conservation and transportation planning and project development of Riverside County through the year 2020, including a new County General Plan, adoption and Tier 1 environmental clearance for new transportation corridors, and adoption of a Multi-Species Habitat Conservation Plan. One of the primary transportation corridors under consideration for the transportation component of the RCIP is a new Riverside County to Orange County connection. Any such connection would affect the Cleveland National Forest, as the Forest is located along the entire length of the border between these counties. At present, the only significant transportation corridor linking these two counties is State Route 91, located near the northerly edge of the Cleveland National Forest. While we are yet in the process of identifying alignment alternatives, preliminary discussions with local Forest Service staff suggests that a realignment of existing State Route 74, potentially with some tunneling, might prove to be more acceptable than other alternatives. No

decision has been reached with respect to this corridor proposal. Any number of alternative alignments covering the entire boundary between the two counties are still under consideration. Additionally, we recognize the need to coordinate our planning efforts with the upcoming update of the Forest Management Plan. However, we would like to confirm that realignment of State Route 74, perhaps a significant realignment, as well as other reasonable and prudent alternative alignments would still be considered by the Forest Service in light of the Proposed Roadless Rule. It appears that the entire area northerly of existing State Route 74 is being proposed as a roadless area. Any number of alternative alignments would potentially affect portions of this area. As the planning and consensus building for this corridor continues, we fully intend to involve the Forest Service in the process. (County Agency, Riverside, CA - #13964.71110)

Another area of concern is Bautista Canyon Road in the San Bernardino National Forest. The County Transportation Department, in conjunction with the Forest Service is undertaking a project to pave and realign, consistent with traffic safety needs, the segment of this road within the National Forest that is currently a County Maintained dirt road. The environmental phase of this project is just getting underway, but it already appears likely that some realignment of the existing road will be needed in order to comply with design safety standards. Again our concern would be that Proposed Roadless Rule not preclude such realignment. (County Agency, Riverside, CA - #13964.71110)

There are many places where new roads need to be constructed to improve our national infrastructure and which could reduce the mileage between major population centers. Such improvement would reduce fuel consumed and thus enhance the environment with less greenhouse gasses, etc. (Individual, Fountain Hills, AZ - #950.81000)

Another area of concern is noted on page 3-172 in Volume 1 of the DEIS. It is located in the first sentence of the third paragraph. It states, "THE ROAD PROHIBITION WILL LIMIT ROADED RECREATION ACCESS TO INVENTORIED ROADLESS AREAS, WHICH MAY CAUSE INCREASED CONGESTION IN EXISTING ROADED AREAS OF THE FOREST." It is a known fact that congestion leads to the cause of multiple car accidents. And in areas of extreme terrain, congestion becomes more of a problem due to the increased distribution of operating speeds of vehicles. Loaded 18 wheel trucks and motor homes have trouble negotiating the steep grades in areas of extreme terrain. This leads to congestion because, cars will become trapped behind these slower types of vehicles. Drivers of the faster cars will become frustrated and will attempt to pass the slower vehicles in limited areas of safe sight distances. Poor decisions will lead to head on collisions with vehicles in the opposing lanes. These types of collisions will normally result in fatalities. It is necessary that WYDOT is able to execute their mission without any further restrictions in these areas. WYDOT will need the latitude to expand the present roadways where needed. Expansion will be needed to reduce congestion. An example of expansion may include the addition of truck climbing lanes in areas of steep grades. Passing lanes is another example that may be implemented in areas of restricted sight distance. (State Agency, Cheyenne, WY - #15885.72400)

WYDOT [Wyoming Department of Transportation] is thankful for the opportunity to provide comments on this new national plan for the management of roads on Forest Service land. After review of the maps on pages 214 through 221 in Volume 2 of the DEIS, it became extremely evident that several US Highways and State Highways intersect the areas designated that will not permit road construction or reconstruction. A very rough summary was prepared to understand the potential effect on these highways. This summary is attached to this letter. This summary reflects the potential of 260 miles of roadway that is presently being managed by WYDOT [that] could be affected from this proposal.

WYDOT attended the public meeting. Representatives from the Planning Branch of the Forest Service reassured DOT officials that this proposal would not interfere with WYDOT's management of these roadways. However, this was never clarified in the DEIS and as such potential impacts to the State's Highways are unknown. (State Agency, Cheyenne, WY - #15885.40200)

**Public Concern: The final rule should be consistent with commitments made in the Environmental Streamlining National Memorandum of Understanding regarding expedited highway and transit projects.**

We are confused about the timing of this proposed rulemaking. An Environmental Streamlining National Memorandum of Understanding was signed in July 1999 by several federal agencies, including the U.S. Department of Agriculture. The MOU required that agencies streamline processes to expedite the construction of highway and transit projects. The proposed rulemaking appears to contradict the streamlining effort. (State Agency, Richmond, VA - #87.40000)

### 6.2.3 Exceptions to the Road Building Prohibition

Numerous respondents request that the Forest Service reconsider the exceptions to the proposed rule that would permit road building and reconstruction under specific circumstances. Critics of the rule who favor stronger roadless protections assert that the proposed rule contains too many exceptions and loopholes, thus rendering it ineffective.

They suggest that the Forest Service substantially narrow any exceptions for road construction in the final rule. Some recommend that the Forest Service narrow the exception language for catastrophic fire. Indeed, several respondents believe private property owners should be required to take measures to fireproof their own property. Others feel that the final rule should narrow the exemption language to protection of life and property to prevent “significant loss of constructed property, such as buildings and bridges.”

The exemption for public safety is a topic of concern to many respondents. Several environmental organizations suggest that rather than removing hazard trees, the Forest Service should establish guidelines for alternative hazard management strategies. Others suggest that the exemption for public safety be relaxed. (Many opponents, especially businesses, utilities, and state and local governments, request that exceptions be broadened to specifically allow road access to mineral resources and utility infrastructure, and ski area development. Others oppose these exceptions. These concerns are covered in Sections 6.3.7, 6.3.9, and 6.3.10).

“The Forest Service should insert ‘A road is needed to carry out the multiple uses provided for in the authorities cited for these regulations’ following Section 294.12(b)(4) of the Draft EIS,” states a mining association. Some researchers request that the Forest Service should consider broadening exceptions in the final rule to include special use permits for scientific research projects. Finally, some call for a provision in the final rule that all requests for exceptions be subjected to the proper NEPA (National Environmental Policy Act) analysis process and independent scientific review.

**Public Concern: The Forest Service should limit exceptions for road construction in the proposed rule.**

We therefore ask the Forest Service to modify the language of the exceptions to the road construction/reconstruction prohibition to ensure the exceptions are not abused. Specifically, we ask the agency

to add language that allows road construction or reconstruction in roadless areas only when (1) it is demonstrated that such road construction or reconstruction is necessary to achieve the intended purpose, and (2) it is shown that all other means of access--not requiring road construction or reconstruction--are impracticable. (Environmental/Preservation Organization, Laramie, WY - #43697.31000)

On page S-1 (and wherever else it is found in these documents), the phrase, “unless they (roads) are needed for public health and safety, for reserved or outstanding rights, or for other specified reasons.” This discretion is way too broad and subject to arbitrary discretion. (Environmental/Preservation Organization, Bellaire, TX - #13951.31100)

**Public Concern: The Forest Service should narrow the exception language for catastrophic fire.**

By the definition given (3-99) ALL fires are catastrophic on most counts; including prescribed ones. (Individual, Deer, AR - #44200.31100)

The draft policy states that the exceptions are not intended to cover “routine forest health activities, such as temporary road construction for thinning to reduce mortality due to insect and disease infestation. However Forest Service managers in the past have commonly viewed wild fire, blowdown, and other natural disturbances as “catastrophic events” that warrant salvage logging. In fact, the rather loose definition of what constitutes catastrophic fire, “A wildland fire that may do one or more the following: burn large acreage (1,000 plus acres); kill most of the trees; significantly alter habitat; adversely affect water and/or air quality; and damage the soil” is too open-ended to be meaningful. The word “catastrophic” should be reserved for events that destroy human life and property. (Environmental/Preservation Organization, Washington, DC - #43731.32000)

If a person requires an emergency rescue, a helicopter response team would most likely be faster and much less expensive to the forest ecosystem than logging through the forest to make a road. (Environmental/Preservation Organization, Weldon, CA - #16041.90310)

**REQUIRE INHOLDERS TO TAKE RESPONSIBILITY FOR FIREPROOFING PROPERTY**

The imminent threat of fire should not be justification to log through public forests to protect private property, which would result in the loss of the roadless characteristics and the fire prevention characteristics of the forest. The private property owner should take the responsibility to protect his or her property from fire rather than relying on the agency to log a roadway for firefighters to protect private property. This kind of land exchange is not equitable when the public loses public lands because private property owners fail to adequately protect private property. The private property owner should be required to clear around private structures and to install fireproof roofing on all private property structures, so emergency roads do not have to be constructed through public lands. (Environmental/Preservation Organization, Weldon, CA - #16041.90310)

Statistics regarding population density patterns. Why is the USFS automatically expected to be responsible for people’s homes? The people that live in the WUI must make every effort to protect their homes and property through planning for the eventuality of a fire in their area. Living in this zone is a lifestyle choice for many, and they must accept and plan for wildfire risk. (Individual, Leavenworth, WA - #15897.90100)

**Public Concern: The final rule should narrow the exemption language for protection of property to “constructed property.”**

The exception for roads that are “needed to protect life and property” should be clarified to protect life and prevent “significant loss of constructed property, such as buildings and bridges.” (Environmental/Preservation Organization, Eugene, OR - #55101.32000)

**Public Concern: Rather than authorizing the removal of hazard trees in the exemption for public safety, the final rule should include guidelines for alternative hazard management strategies.**

Rationalizing building roads for public health and safety reasons...for loggers to remove trees that are dead or dying (so-called “hazard trees”) because there is a possibility for these dead or dying trees to fall on a person walking in the forest, will only continue to cut down and fragment the forest habitats. The Forest Service has failed to preserve the National Forest wildlife habitats and ecosystems using this rationale... You must do what needs to be done to preserve the ecosystem, not cut it down. Removal of these so-called “hazard trees” from the habitat, rather than downing the trees and leaving them as down logs in the forest, would decrease wildlife nesting sources and soil nutrient sources, and will constitute the opposite of the ecological restoration criteria of “immediately stop(ping) activities that have the greatest likelihood of degrading desirable characteristics” and “Restoring an area to historic ecological conditions.” These public safety issue trees could instead be felled, their branches removed and the trunk of the tree left on the ground in order to further the transition back to a natural forest. These trees could also be artfully topped and left standing in the forest as habitat, as is done by North Cascade National Park. The “hazard tree” guidelines for Marble Mountain District, North Cascade National Park, Washington, rarely use logging to remedy “hazard tree” conditions. (Environmental/Preservation Organization, Weldon, CA - #16041.84000)

[O]utside the forest, hundreds of people have died each year because of automobile and airplane accidents, but cars and planes are allowed to remain in our society. Hundreds of people have died each year from bacteria-tainted hamburgers, but ground meat is still allowed to remain in our society. Thousands of people have died each year from failed operations, but doctors still practice in our society. According to the Centers for Disease Control, 80,000 people died in 1999 from hospital-acquired infections, but hospitals are allowed to remain in our society. Each year 150 children are killed on “all terrain vehicles” (ATV’s) but ATV’s are not banned from our society and the Forest Service proposes building more trails for off-road vehicle use. There are very few accidents or deaths each year caused by a tree or a branch in the forest, so the forest should not be cut down because of the possibility of an accident from a falling tree or branch. There is a much lower number of accident incidences from hazard trees than from many other societal causes of accidents and deaths (drugs, knives, hand guns, etc.), yet the Forest Service proposes allowing to remove these trees because they are a “potential” public safety hazard. (Environmental/Preservation Organization, Weldon, CA - #16041.84000)

**Public Concern: The Forest Service should relax the exemption for public health and safety.**

The exception in Sec. 294.12 (b)(1) is way too restrictive in that it allows a justifiable road only for an imminent threat of a catastrophic event. The exception ought to be worded to say “(a) road is needed to protect public health and safety.” (County Elected Official, Provo, UT - #13564.10210)

**Public Concern: The Forest Service should insert “A road is needed to carry out the multiple uses provided for in the authorities cited for these regulations” following Section 294.12(b)(4) of the Draft EIS.**

ADDITIONAL EXCLUSION MUST BE ADDED TO SECTION 294.12(b). The following item should be inserted after Section 294.12(b)(4): “(5) A road is needed to carry out the multiple uses provided for in the authorities cited for these regulations.” (Mining Association, Reno, NV - #15907.3110)

**Public Concern: The Forest Service should consider broadening exceptions in the final rule to include special use permits for scientific research projects.**

We are concerned that there are areas within California and across the nation where scientific and educational endeavors may be unintentionally curtailed due to conflict with the proposed Roadless Area Conservation Rule. As noted in our letter dated December 17, 1999, we are interested in relatively small parcels of land within the Inyo National Forest, California, which we may request to use to improve the national effort in millimeter wave astronomy. This use would have a very limited effect on the environment....Although we believe that assessing every type of exemption would be unreasonable, we also believe that the Rule should recognize special uses other than the non-recreational, commercial and non-commercial special uses noted on page 3-141 of the DEIS. The uses noted on page 3-141 are broadly characterized as uses that “generally, but not always, rely on road access to accommodate construction, operation and maintenance. As such, the majority of existing and proposed uses are either located or proposed to locate where roads currently exist.” The ability to construct, and operate special, research-oriented projects without road access is overlooked in the document, and should be more specifically addressed as an exemption or approved special use. (University, Pasadena, CA - #25993.90000)

There is a network of “Snowtel” facilities operated by the NRCS that monitor and track snow levels and moisture content (used in forecasting runoff). We are concerned that the roadless proposal might restrict access to these sites. Access is critical for operation and maintenance as well as for potentially installing new sites. (State Elected Official, Cheyenne, WY - #2816.90333)

**Public Concern: Any exceptions made in the proposed rule should be subjected to the proper National Environmental Policy Act analysis process and independent scientific review.**

...any exceptions to be permitted to the proposed rule--IN WHATEVER FORM--must be subject to stringent and thorough review to insure that the abuse of such clauses is not a reprise of past management activities. In particular, so-called salvage logging must be prohibited in all inventoried and uninventoried areas and the Tongass. So-called “wildlife management” activities must be subject to NEPA EIS requirements and independent scientific review for validity, as should all activities associated with fire suppression, insect infestation, habitat modification, or any other “forest health” activities. For far too long, such activities have led to the flagrant abuse and destruction of much of our remaining real Forest to satisfy either the timber industry or the intellectual prowess of “wildlife managers.” (Individual, Bland, VA - #44198.93320)

## 6.2.4 Road Decommissioning and Removal

A great many respondents are convinced that the Roadless Area Conservation Proposed Rule will lead to extensive closures of existing roads and to significant reductions in areas for motorized recreation, regardless of the actual language of the proposed rule. Central to this fear is a concern over what the definition of a road will be in the final rule (see Chapter 9). While the proposed rule claims to ban only new roads, the Forest Service should clarify whether it would lead to closure of existing roads and trails, numerous recreationists assert. The Forest Service should report the rate of current road decommissioning and the effects of the rule in the Final EIS, some remark. Many forest users maintain that the Forest Service should assure no net loss of road and trail miles so that their recreational needs will still be fulfilled. Some mention that the existing road system is needed for search and rescue, as well as for a multitude of other uses.

Among those members of the public who believe that roads can be environmentally harmful, some suggest that the Forest Service should permanently close roads not essential to forest maintenance. To this end, individuals propose that the Forest Service install physical barriers on many existing roads to minimize environmental damage from continued vehicular access. Some request that the Forest Service convert decommissioned roads to non-motorized trails. Others feel that the Forest Service should give priority to closing private roads which extend into the national forests but which are not accessible to the public.

Numerous respondents advocate that the final rule should require that roads in inventoried roadless areas be decommissioned in order to restore those areas to their formerly unroaded condition. Notes one environmental organization, "It seems more than coincidence how some of the 1980's and 90's roads were punched into . . . RARE inventoried RA's, technically reducing them to less than 5,000 acres in size. These roads, often used to access only a single timber sale in the heart of a roadless area, should be decommissioned to move toward restoration of these areas to their unroaded condition." Some respondents recommend decommissioning of specific roads.

While a large number of people recommend active decommissioning of roads, many others strongly oppose this practice and state that the Forest Service should not remove roads. Some question the methods used by the Forest Service to decommission roads, such as covering them with cut brush, installing tank traps and recontouring. Some suggest that the Forest Service should simply reseed a roadbed rather than remove it, while another contends that asphalt pavement should be removed on decommissioned roads. Many object to road obliteration because it can be more environmentally destructive than the continued presence of the roads themselves. One suggestion is that the Forest Service convert existing roads to trails rather than eliminate them entirely.

**Public Concern: While the proposed rule claims to ban only new roads, the Forest Service should clarify whether it would lead to closure of existing roads and trails.**

The fact that this proposal claims to ban only new roads is far from reality. The truth is that there are many trails, jeep tracks, and other areas that accommodate motorized traffic in some way or another. These pathways provide transportation to rural residents and routes for others to arrive at favorite recreational destinations. Many of these roads are not officially recognized as roads and the battle over what a road really is continues to rage. If this rule is enacted, thousands of these small roads and trails will be ignored and will be absorbed as part of a "roadless forest." Therefore, the so-called banning of new road building will also have the effect of dismantling many existing roads. (Individual, Salt Lake City, UT - #6753.91710)

This plan only covers classified roads. Where do the four wheel drive roads go into the plan? None of these roads have been accounted for. (Individual, Tucson, AZ - #13310.32100)

In the intro a comforting statement reads "No roads or trails would be closed because of these prohibitions." Later I read that "unnecessary roads would be decommissioned." This concerns me greatly because most of the trails I have ridden at some point end at a dirt road. In order to connect to the next trail I have to ride down these roads. Would these roads be "decommissioned" and therefore block my access to some of the trails I enjoy riding? (Individual, Chatsworth, CA - #5532.10212)



It says that “No roads or trails would be closed. Areas now open would remain open.” Why are they moving locked gates down the roads, making Reese traps, and generally trying to close roads that have been open for 50 years? (Individual, Pierce, ID - #10735.91710)

Given the...Road Management Plan’s stated goal of “aggressively decommissioning unneeded” roads, how will the public be assured that the roads currently existing in a so-called “roadless” area will not automatically fall into the “unneeded” category by virtue of their location within the “roadless” area. (Recreational Organization, Los Alamos, NM - #5663.72220)

**Public Concern: The Forest Service should report the rate of current road decommissioning and the effects of the rule in the Final EIS.**

Pg. 3-13 Forest Service Road System. This Section needs to include a map showing planned road construction by region.

Pg. 3-15 indicates that road construction has declined to about 192 miles a year in 1999 with decommissioning of nearly 2,660 miles of road per year resulting in a net loss of 2,468 miles per year. This represents a cumulative impact that should be analyzed along with the roadless initiative. Please provide a discussion of the types of roads decommissioned each year. How many miles would affect the inventoried areas? (County Elected Official, Battle Mountain, NV - #43985.33300)

**Public Concern: The Forest Service should assure no net loss of road and trail miles.**

I suggest that the USFS follow a simple policy to mitigate this closure problem. For every mile of road or trail closed by the Roadless Initiative, the USFS be required to identify in cooperation with recreationist groups an equal amount of similar trails to replace the lost access. This rule would eliminate any “hidden agenda” effect of the roadless designation process. (Individual, Valyermo, CA - #172.61300)

Please do not remove [roads] because you simply think it will make it better...These old roads are not expanding, we lose roads every year. It is never the case that roads are added. (Individual, No Address - #8620.84610)

**Public Concern: The Forest System should maintain access to the road system for search and rescue.**

We need ACCESS FOR SEARCH AND RESCUE efforts. The cost and effort required for search and rescue in the absence of roads is very high in time, money, safety and lives. (Individual, West Point, UT - #4008.93622)

The road systems affected by the NPRM make helicopter use in search and rescue, fire suppression, animal control and law enforcement missions possible, because helicopters are short-range aircraft that need ground support teams and equipment nearby when conducting operations in remote locations. Other forms of transportation available to emergency response and law enforcement personnel are even more dependent on roads for access to remote areas than are helicopters. (Business/Business Association, Alexandria, VA - #29960.90000)

**Public Concern: The Forest Service should permanently close roads not essential to forest maintenance.**

The Forest Service must immediately commence the permanent closure of 80% of all roads not essential to forest maintenance. (Individual, Carlsborg, WA - #10562.64150)

As a resident of Oregon, I find that there are far too many logging roads in our forest now! Not only do I support the effort to ban further roads, but I think that about 50% of existing roads should be abandoned. (Individual, Albany, OR - #2391.10100)

I urge you to close, obliterate and revegetate at least half the total miles of roads in all national forests... (Individual, Oakland, CA - #311.64150)

And if you really want to make a difference, obliterate some of the old roads that are already scarring our land and are no longer used! (Individual, Glenwood springs, CO - #6404.84610)

Please reclaim all the old logging roads. (Individual, Watertown, NY - #5622.84610)

I support every attempt to close roads on the national forests. I support this roadless initiative and I believe you could close even more roads. (Individual, San Cristobal, NM - #319.71300)

I would like to see a significant amount of road closures (up to 50% of existing roads) to reduce maintenance costs and enhance wildlife habitat. (Individual, Laramie, WY - #3604.71300)

Please reduce the number of dirt roads in the Medicine Bow NF. Make larger areas non-accessible to motorized travel. (Individual, Laramie, WY - #6871.91610)

**Public Concern: The Forest Service should install physical barriers on many existing roads to minimize environmental damage from vehicular access.**

The USFS should immediately gate many existing roads to keep out poachers, ORVs, ATVs, and others who harm wildlife and degrade habitat. BLM roads in my watershed were gated two years ago to keep vehicles from entering and spreading spores of the Port Orford root rot disease. I and my neighbors have noticed a dramatic improvement in our watershed since the gates were installed, including increased wildlife sightings, much less trash along roads, less sedimentation in creeks, and other benefits. (Individual, Oakland, CA - #311.83000)

In a desert like Los Angeles, part of Mulholland Highway is blocked off at two ends in a dirt road area. It is almost miraculous how the brush is repairing the scars of years of illegal off-roaders. After the brush provides some shade, the oak and sycamore sprouts will come.... I hope this road block is made permanent too. I have never seen as many people hiking and just walking in the area as I have on the road and trails in the past year. It is an attraction. It provides value while healing. I hope you will let the healing begin and continue on all our lands. (Individual, No Address - #1899.84600)

**Public Concern: The Forest Service should convert decommissioned roads to non-motorized trails.**

I would also point out that roads used to log can be left in place and blocked off so that they cannot be used by motorized vehicles but can be enjoyed by people (hiking, etc.) and animals (moose and bear, for example, prefer well-defined paths at times). (State Elected Official, Anchorage, AK - #17254.80000)

**Public Concern: The Forest Service should give priority to closing private roads which extend into the national forests but which are not accessible to the public.**

When roads are to be closed, the first and most obvious category for closure must be those roads that extend into the national forests from private land and are not accessible to the public. In other words, the remaining roads left open for travel on national forests must be available to everyone and not part of an exclusive use pattern that only benefits a few individuals. (Wise Use or Land Rights Organization, Billings, MT - #830.10212)

**Public Concern: The final rule should restore inventoried roadless areas by decommissioning roads and returning these areas to their unroaded conditions.**

It seems more than coincidence how some of THE 1980'S AND 90'S ROADS WERE PUNCHED INTO AND FRAGMENTED RARE INVENTORIED RA'S, technically reducing them to less than 5,000 acres in size. Locally this comes to mind with the MOOSE LAKE RA OF THE WILLAMETTE NATIONAL FOREST. THESE ROADS, OFTEN USED TO ACCESS ONLY A SINGLE TIMBER SALE IN THE HEART OF A RA, SHOULD BE DECOMMISSIONED TO MOVE TOWARD RESTORATION OF THESE AREAS TO THEIR UNROADED CONDITION. (Environmental/Preservation Organization, Albany, OR - #6506.83421)

All existing roads within inventoried roadless areas should be immediately decommissioned. This requirement should be added to the EIS. (Individual, Richland, WA - #1006.71300)

Small abandoned roads, such as Mineral Fork, or White Pine, make poor boundaries for several reasons. Wilderness boundaries should go from ridge crest to ridge crest. This would virtually "wipe out" heli-skiing from the tri-canyon area, and keep Snowbird from ever expanding into White Pine. (Individual, Salt Lake City, UT - #15933.90240)

I...support demolishing roads in national forests to improve roadless areas. I have had the fortune to travel to other places around the world. When I compare wilderness and some roadless areas in the United States to other areas, there are far too many roads in the national forests. In some places, such as in my home state of Colorado, almost every ridge top and valley has a road. These roads are within a mile or less from each other. Wilderness and roadless areas cannot be simply defined by starting at the immediate side of a road. The distance between roads must be enough to support wildlife and ecosystems without any visual interruptions. Many existing areas are too small and have roads too close together. (Individual, Lakewood, CO - #2122.64150)

Please respect and support the President's directives to the Forest Service to halt all road building in roadless areas on the National Forest System. Please where possible reverse the negative impact of roads already built by restoring those areas to their natural condition. (Individual, Normal, IL - #332.10100)

I support no new road construction in roadless areas. Road obliteration should be planned for roads recently built into inventoried roadless areas. (Individual, Republic, WA - #695.84610)

**Public Concern: The Forest Service should pursue the decommissioning of specific roads.**

Put the "Highway" from Warm Lake to mouth of E. FK of S. Fork of Salmon back to trail status. (Individual, Boise, ID - #5856.84610)

### **Public Concern: The Forest Service should not decommission roads.**

I strongly oppose the proposed new rules prohibiting building of new roads or reconstruction of existing roads in inventoried roadless areas. As a resident of the Lake Tahoe Basin, I am aware that public funds are already being wasted 'decommissioning' existing roads at a cost of approximately \$100,000 a mile. (Individual, No Address - #2236.93641)

### **Public Concern: The Forest Service should reconsider the methods used to decommission roads.**

#### **DO NOT COVER ROADS WITH CUT BRUSH**

The practice of covering a road with miles of cut brush to make it impassable for foot traffic, human or animal, is particularly offensive. The only apparent purpose is to benefit future logging as the road can be readily cleared again with heavy equipment. (Individual, Noxon, MT - #3406.93610)

#### **REPAIR TANK TRAPS**

I feel that the "tank traps" that were used to close hundreds (if not thousands) of miles in the Island Park, Idaho area are illegal and that the Forest Service should be made to repair them. (Individual, No Address - #6762.71300)

#### **RESEED OR ABANDON RATHER THAN RECONTOUR**

Obliteration of roads is a ludicrous idea; the cost may be more expensive than the roads cost in the first place. Erosion may be nearly as severe as the original construction, just like pulling the scab from a healing wound. Grass seed and Mother Nature will soon stop any erosion while the road is allowed to sleep. No preparation cost other than seed and one person to do seeding is needed. The grade will always be there and the road can be reopened cheaply for management or emergency. The roads turn into game trails and hunter access. (Individual, Corvallis, MT - #6628.86410)

Allow unwanted roads to die by attrition rather than expend hours and materials to block and post. (Individual, John Day, OR - #1285.10211)

#### **REMOVE ASPHALT PAVEMENT ON DECOMMISSIONED ROADS**

I would like to see the black asphalt pavement of decommissioned roads ripped out. (Individual, No Address - #2479.71300)

### **Public Concern: The process of closing or decommissioning roads can be more environmentally destructive than the presence of roads.**

The vast majority of existing roads have been placed in locations that avoid breaching riparian areas. Road drainage is well engineered to minimize erosion, and the subsoil forms a superior, permanent roadbase. As a result, many of these roads have been in use, without ANY maintenance, for nearly 50 years. In the last 3 or 4 years, the Service has undertaken a program of 'reclaiming' these roads, but now we are not so fortunate. In a misguided and poorly planned undertaking, roads are being destroyed with this obvious goal: CLOSE OFF THE MOST ACCESS WITH THE LEAST AMOUNT OF MONEY. This results with a plan that becomes quite simple: Using a Caterpillar-type dozer, the Service operator simply drops the ripper shanks and teeth, crawls down the road, then (maybe) scatters grass seed in the wake of destruction. In the five-mile radius closest to the Bow River Ranger Station, more than thirty miles of road have been destroyed this way. Unfortunately, this program has brought devastating consequences to the environment. Natural drainage patterns have been

disrupted. Spring runoff is channeling into former roadways, flushing away everything smaller than golf-ball-size rocks. Sand and silt are being deposited in huge quantities into the Medicine Bow River...Is the Service exempt from the Clean Water Act? (Wise Use or Land Rights Organization, Rock Springs, WY - #2866.83200)

...[I]t is obvious that “reclaiming” these roads to “pre-European settlement” (your definition) is at best, prohibitively expensive, and at worst, impossible. “Reclaiming” them to any lesser degree will be an environmental disaster. Why not leave them alone? (Wise Use or Land Rights Organization, Rock Springs, WY - #2866.84610)

### **Public Concern: The Forest Service should convert existing roads to trails rather than eliminate them.**

I am not in favor of any initiative which wastes the roads already in place, which if the area needs it, could be converted to motorless trails for hikers, bicyclists, and equestrians.

Not building any new roads may be an excellent idea, but if the road is already there, don't waste it, convert it. Perhaps repair half for bikes and hikers, and return the other half to turf for equestrians--thus making some nice wide trails.

Repair of these trails, or conversion, serves the needs of the public much better than closing these lands to people by eliminating the roads, which could end up eliminating the only way to a trail head or more remote camping spot. (Individual, No Address - #6996.91750)

Please do not restrict our use of roads & trails. If roads are not needed please add them to the trail inventory. (Individual, Newark, CA - #7292.91700)

Please accept our concern regarding access to all the travel routes in the Big Bear area. We love to travel to different areas in the mountains. If the travel routes are closed we will not be able to access the areas and enjoy them. Please do not close access to our public lands. Please keep the travel routes open to drive through as part of the trails system, as covered under Chapter 2352 of the Forest Service Manual. (Individual, Redondo Beach, CA - #142.10212)

## **6.2.5 Trail System Management**

While most comments from the public regarding travelway infrastructure discuss the road system, some respondents are also concerned with the future of the trail system in roadless areas. The Forest Service should clarify whether the proposed rule would affect new trail construction and maintenance, some request. Some fear that the proposed rule will unacceptably limit trail maintenance and construction due to new restrictions on ground-disturbing activities.

Others feel that to assure full protection of roadless area characteristics, the Forest Service should avoid building trails in roadless areas to the greatest extent possible. Some narrow this request to prohibiting only motorized trails in roadless areas. Some respondents suggest that the final rule replace the phrase “of any size” in the proposed version with language limiting trail size in inventoried roadless areas to U.S. Forest Service pack and saddle standards unless otherwise authorized in a forest plan.

On the other hand, some encourage the Forest Service to increase the number of hiking trails in roadless areas, while others encourage the agency to construct new trails for mountain bikers and motorized recreationists. One individual, in particular, admonishes the Forest

Service not to use the threat of lawsuits as a rationale for limiting trail building. Another respondent asks that when roadless areas are officially designated, any nearby trails that are partially on county roads should be rerouted through the roadless areas. Finally, some request that the Forest Service maintain rather than close damaged motorized trails.

**Public Concern: The Forest Service should clarify whether the proposed rule would affect new trail construction and maintenance.**

Does the rule affect new trail construction of any kind? (Individual, Pocatello, ID - #2959.91000)

The DEIS does not indicate how the decisions would or could impact the State's Trail Program, which allocates grants for trail related maintenance and development. We ask that a coordinated State-Forest Service approach be emphasized in analyzing appropriate use of these funds in both roaded and roadless areas. (State Elected Official, Helena, MT - #19289.91000)

**Public Concern: The proposed rule should not be implemented because it bans most "ground disturbing activities" which will preclude necessary trail maintenance and construction.**

I oppose the roadless initiative because it bans most "ground disturbing activities." As a mountain biker and dirt biker, I depend on trails. The roadless initiative will prevent the maintenance of existing trails as well as the construction of new trails. Even if trail maintenance isn't banned, the roadless initiative could make it more difficult to carry maintenance equipment such as chainsaws and Pulaskis into the forests. Without maintenance, trails can become eroded and covered with deadfall. Deadfall and erosion can lead to unsafe trail conditions as well as illegal cut-around routes. Eventually, the lack of maintenance caused by the roadless initiative will result in the closure of the trail on the basis of it being an eyesore. (Individual, Fort Collins, CO - #11334.91700)

**Public Concern: The Forest Service should avoid building trails in roadless areas.**

With few exceptions, roadless lands should be managed as little as possible. The closer these lands can remain to natural landscapes the better. By that I mean that they should not be allocated to any use other than resource protection. Formal trail construction should be avoided. (Individual, No Address - #5137.10100)

I prefer Alternative 3. However, I fear that the existing uses will be overly exploited. More new trails could be built for "viewing from atop your horse" or "screaming down on your mountain bike." If this is the intent, more roads will be maintained than otherwise and more trails will be maintained and built. (Individual, Bend, OR - #533.64130)

**Public Concern: The final rule should prohibit the construction of new motorized trails in roadless areas.**

In my view, a motorized trail has similar negative effects on wildlife and biodiversity. Consequently, roadless areas also need to be free of motorized trails. NO NEW MOTORIZED TRAILS. The internal combustion engine is everywhere. Keep it out of the remaining roadless areas. (Individual, Beulah, CO - #607.91610)

“Any size and number of motor vehicle roads can be created, even in 10,000, 50,000 or 200,000-acre inventoried wild lands, as long as they are labeled “trails.” The proposed action is far weaker than current management on national forests such as the Helena National Forest, which already analyzes the effects of relevant projects such as timber sales, oil and gas leasing and travel plans on conservation of roadless characteristics. (Individual, West Glacier, MT - #52497.71300)

**Public Concern: The final rule should replace the phrase “of any size” with language limiting trail size in inventoried roadless areas to U.S. Forest Service pack and saddle standards unless otherwise authorized in the forest plan.**

The exception language in Part One allowing motorized trails “of any size” to be constructed in inventoried roadless areas is too broad and fails to take into account regulations governing planning (36CFR 219.21 (g)) and the use of motor vehicles off forest development roads (36CFR 295).

The final rule should strike the words “of any size” and replace it with language limiting trail size in inventoried roadless areas to U.S. Forest Service pack and saddle standards (12-24 inch tread width) unless otherwise expressly authorized in the forest plan. (Environmental/Preservation Organization, No Address - #18652.91610)

**Public Concern: The Forest Service should increase the number of hiking trails in roadless areas.**

Increase the number of hiking trails through this beautiful high country. (Individual, Laramie, WY - #6871.91740)

**Public Concern: The final rule should allow construction of trails for mechanized and motorized users.**

ATV trails, snowmobile trails, MT bike trails should all be permitted to be constructed. (Individual, Carson, WA - #13433.91700)

The agency should develop new trails...for motorized recreation. (Individual, Lander, WY - #13200.91700)

**THE FOREST SERVICE SHOULD NOT USE THE THREAT OF LAWSUITS TO LIMIT TRAIL BUILDING**

“Activities in roadless areas that alter roadless characteristics create public controversy, appeals, and lawsuits.” I am concerned that this statement can be used to prevent building new OHV trails in our roadless areas. PLEASE DON’T CLOSE OUR ROADLESS AREAS. THEY ARE ROADLESS FOR A REASON--THE LAND IS MARGINAL FOR TIMBER, THE TIMBER COMPANIES DON’T WANT TO PUT ROADS THERE ANYHOW. (Individual, No Address - #9756.91710)

**Public Concern: When the roadless areas are created, any nearby trails that are partially on county roads should be rerouted through the roadless area.**

When the roadless areas are created, any trails in the vicinity, that are currently partially on County roads, should be rerouted through the newly created wilderness. The Forest Service should encourage local authorities to do this rerouting of any trail that would fall into this category. (Individual, Jacksonville, IL - #3409.71300)

### **Public Concern: The Forest Service should maintain rather than close damaged motorized trails.**

The foot of motorized recreation is being stuffed into a rapidly shrinking boot and it pinches. More and more people are enjoying this type of recreation, while we plan for more restrictions and fewer places to use. Instead of seeing a damaged trail as a reason to close the area, we should look at ways to repair and improve the trail so more people can use the area without damage. (Individual, Lander, WY - #13200.91700)

## 6.2.6 Ways

Many recreational users of public lands express concern over the unofficial, user-created road and trail system. Many motorized users fear that these trails will not be considered roads, thus these areas may be considered roadless and motorized pursuits restricted. “There are many trails which are currently used by ATVs. They are not roads. Does your proposal mean that these trails will be considered ROADLESS and ATVs will be banned?” queries one worried rider. A great many other recreationists decry the proliferation of motorized user-created ways, and urge the Forest Service to decommission all illegally established roads in inventoried roadless areas. “There are also many roads that are not currently shown on the maps and I would encourage these be considered for elimination in the travel plan. These roads have been created at an alarming rate in the past few years by all terrain vehicles,” writes one concerned citizen. Many others feel that the Forest Service should close all unauthorized or unofficial roads to all forms of motorized travel.

Still other backcountry users observe that many trails are being illegally widened by OHV usage. They call for the Forest Service to prevent dirtbikes and OHVs from converting former trails into ATV roads. “These [pack and saddle] trails are 1/4 to 1/2 the width of an ATV. Roadless trails 12-24 inches wide...have become 5-10 feet wide ATV roads. As levels of ORV traffic increase, traditional forest visitors are displaced” and the environment severely impacted, observes one individual. Many people ask that the Forest Service cease and desist incorporating these illegal trails into the official trail system because this only encourages further creation of illegal trails. However, some motorized users feel that the solution to this increasing problem is to maintain existing OHV trails and create more trails to keep users from doing so themselves. “If the trails were kept up and more were made, you may not have a problem with people making their own trails in the forest,” one OHV enthusiast suggests.

### **Public Concern: The Forest Service should clarify whether ATV trails will be considered roadless and ATVs banned.**

There are many trails which are currently used by ATVs. They are not roads. Does your proposal mean that these trails will be considered ROADLESS and ATVs will be banned? (Individual, Hyrum, UT - #2927.32000)

Is a motorized trail considered the same as a road? (Individual, Pocatello, ID - #2959.32200)



**Public Concern: The Forest Service should decommission illegally established roads in inventoried roadless areas.**

Not only would I like to see all new road construction halted in roadless areas, but I think you should decommission existing illegally established roads in inventoried roadless areas. (Individual, Basin, MT - #7381.84610)

There are also many roads that are not currently shown on the maps and I would encourage these be considered for elimination in the travel plan. These roads have been created at an alarming rate in the past few years by all terrain vehicles. (Individual, Helena, MT - #11228.84610)

**Public Concern: The Forest Service should close all unauthorized or unofficial roads to all forms of motorized travel.**

Actually I would like to see all unauthorized/unofficial roads that individuals have created in all National Forest areas closed to all forms of motorized travel. I spend up to eight weeks a year camping, hiking and fishing in the National Forests and the increased intrusion of motorized travel is getting to be a very serious problem affecting the ecology of large areas. Stopping the construction of new roads is a good FIRST STEP. (Individual, Gunnison, CO - #6483.91610)

**Public Concern: The Forest Service should prevent dirtbikes and all-terrain vehicles from converting trails into all-terrain vehicle roads.**

Please prevent dirtbikes and all terrain vehicles from converting Montana trails into ATV roads. (Individual, Choteau, MT - #185.61300)

Thirty pack and saddle trails in the Hyalite-Porcupine-Buffalo Horn Wilderness Study Area (202,000 acres) bordering Yellowstone National Park (Gallatin National Forest) were opened to ATVs by altering forest visitor maps. Like most roadless Forest Service trails, these trails are 1/4 to 1/2 the width of an ATV. Roadless trails 12-24 inches wide, such as Rock Creek Trail #178 (Livingston Ranger District) have become 5-10 feet wide ATV roads. The 200 grizzly wolverine, lynx, elk and bighorn sheep habitat. ORV use quickly becomes a dominant use. As levels of ORV traffic increase, traditional forest visitors are displaced. Impacts to wildlife and fragile mountain headwaters from the use of vehicles off forest roads are rarely monitored in Region One forests, winter or summer. Entire mountain ranges, such as the rugged Crazy Mountains (137,000 acres) held sacred by the Crow Nation (Gallatin and Lewis and Clark National Forests) are being used as a testing area for self-described "extreme motor sports." (Individual, West Glacier, MT - #52497.91712)

**Public Concern: The Forest Service should not encourage the creation of illegal trails by incorporating them into the official trail system.**

In the Abajo Mt., ORV users have ripped trails through roadless areas...This was pointed out to the District Ranger...Instead of closing the illegal trail [he] decided to maintain the trail, install a sign, and construct a parking area, all without due process and in violation of environmental laws and Forest Service policy. I ask that you order this illegal trail closed. Agency's encouragement of use on created trails in roadless areas violates Forest Service policy. (Individual, Oliver Springs, TN - #1698.91612)

## **Public Concern: The Forest Service should prevent illegal trail development by maintaining existing trails and creating more trails.**

If the trails were kept up and more were made, you may not have a problem with people making their own trails in the forest. (Individual, No Address - #3455.93610)

### **6.3 Commodity, Extractive, and Commercial Activities**

This section presents a range of concerns regarding commodity extraction and commercial activities on National Forest System lands. They are divided into sections as follows: 6.3.1 Timber Harvest, Commercial; 6.3.2 Silvicultural Methods; 6.3.3 Adequacy of Analysis, Timber Harvest; 6.3.4 Timber Harvest, Stewardship, and Forest Health; 6.3.5 Fuel Reduction and Fire Management; 6.3.6, Grazing; 6.3.7, Locatable and Leasable Minerals; 6.3.8 Alternative Resources and Energy Sources; 6.3.9 Utility and Water Delivery Systems and Infrastructure; and 6.3.10 Ski Area Permits.

#### **6.3.1 Timber Harvest, Commercial**

Numerous respondents discuss possible prohibitions on timber harvest, given that two of the three action alternatives include such measures. Many feel that the Forest Service should choose Alternative 3 or 4 rather than the Preferred Alternative 2 because road building restrictions would still allow significant timber harvest. According to the Draft EIS, the Preferred Alternative will reduce the timber volume offered from 16,500 MMBF to 15,700 MMBF. A great many proponents of roadless area conservation do not feel this goes nearly far enough, while opponents question this analysis and feel that much more timber volume will be ultimately affected. Many timber companies, employees and individuals vehemently oppose all action alternatives, and feel that the Preferred Alternative will constrain timber harvest activities too greatly.

Opponents question how the Forest Service will meet its obligation to “furnish a continuous supply of timber for the use of U.S. citizens.” Some fear that the potential timber supply deficit will be covered by lumber from international sources. One individual, however, asserts that the proposed rule will not reduce overall timber harvest levels because timber extraction quotas will be made up from different areas of the national forests. On the other hand, at least one respondent feels that allowance for increased timber sales in roaded areas should be included in an alternative. Some suggest that the Forest Service should institute a policy to encourage the public to reduce the consumption of forest resources. One Oregon timber company believes that consumers should be taxed on the purchase of nonrenewable resources to aid in lowering the consumption of these resources. Another respondent, however, claims the No Action Alternative should be chosen precisely because we do not know what society’s needs will be in the future.

Supporters of the proposed rule feel that the Forest Service should end timber harvest in roadless areas because relatively little timber volume will be affected and private timberlands

can adequately supply the nation's wood product needs. Others feel that the Forest Service should acknowledge that current timber harvest methods do not result in the destructive effects of past practices, and therefore should not be restricted. "Our industry is paying for the sins of our fathers. We are not the only industry in this predicament; the salmon fishery in the northwest is hurting as well . . . . While we should learn from our mistakes (and we have) we should not be held accountable for actions we no longer practice that were standard operating procedure at that time," contends one timber company.

Some individuals assert that the Forest Service should end logging entirely in the national forests, not just in roadless areas. One individual specifically requests that it be ended in the Prescott National Forest. The majority of respondents feel that the proposed rule does not go far enough, and request that The Forest Service should assure the final rule restricts timber harvest to a much greater degree than in the Preferred Alternative. They believe the Preferred Alternative does not meet President Clinton's mandate. Many feel that the Forest Service should restrict or completely prohibit timber harvest in roadless areas for many reasons. Some feel there is clear evidence that past levels are unsustainable; others feel that designated wilderness areas need to be buffered from timber harvests and clearcuts. Others request that the Forest Service focus on existing roaded, lower elevation, second-growth stands to furnish a sustainable supply of timber. One individual asserts that on the contrary, many of the second growth stands will not regrow to harvestable size for decades and therefore the Forest Service should allow timber harvest in roadless areas to sustain the timber industry.

Many urge the Forest Service to prohibit harvest of old growth forests in the final rule. One individual suggests logging be halted on any stand of trees aged 200 years or more occupying an area greater than 10 acres. Many express fervent support for preserving the remaining truly wild and intact unprotected forests from harvest because replanted tree monocultures are an inadequate replacement to humans, native plants, and wildlife alike. A common issue for many individuals and organizations who support a more restrictive final rule is the request that all national forests, including the Tongass, be covered. Many express grave concerns that a delay until 2004 will assure the destruction of irreplaceable southeastern Alaska resources.

Among advocates for alternatives 3 and 4, some request that the Forest Service should reassess the exceptions made in Alternative 3 for timber harvest for stewardship purposes and for the salvage removal of fallen and dead timber. Many people call for the Forest Service to cancel all proposed timber sales in roadless areas. Others are concerned that the Draft EIS fails to reveal projected timber harvest after 2004, and that increased sales may be planned after that date. One individual requests that the Forest Service discontinue giving Plum Creek Corporation timber credits.

According to numerous other respondents the Forest Service should continue active timber management and commercial harvest on forest system lands, including roadless areas. "Forests are dynamic systems and should be actively managed to promote resilience against destructive agents, while providing a sustainable level of wood products and recreational opportunity," writes one person. This sentiment is common. A great many people feel that

timber harvest is needed for forest health as well as for economic reasons (see Sections 6.3.4 and 6.3.5 for forest health concerns and Chapter 7 for economic considerations). The Forest Service should allow roads for timber management within National Forest System lands, conclude many opponents to the Preferred Alternative. One timber company feels that the Forest Service has devised the proposed rule to avoid dealing with the fact that national forests have failed to meet set targets for timber production within existing forest plans. Given the restrictions on timber harvest instituted with the Northwest Forest Plan, some request that the matrix lands designated for harvest not be included as roadless areas. Finally, some residents of Minnesota remind the Forest Service to keep its promise to them assuring continued timber harvesting outside the Boundary Waters Canoe Area.

**Public Concern: The Forest Service should address how it will meet its obligation to “furnish a continuous supply of timber for the use of U.S. citizens.”**

If the Forest Service insists on going forward, a new NOI should be developed that includes: address how the FS will meet its obligation to “furnish a continuous supply of timber for the use of U.S. citizens.” (Individual, Titusville, PA - #905.93340)

And, as the amount of available resources dwindles, the population continues to grow. The impact on the land that is available for use becomes more serious. Eventually, with our available natural resources locked up, or used up, America could become dependent on foreign imports for timber, oil, minerals, and perhaps eventually even food. What happens to the balance of payments in the world economy then? What if the nations we depend upon decide they are no longer our friends? America became a great nation, and a great world leader because of our wealth of natural resources. Shall we lock up more and more of these assets forever? (Individual, Richfield, UT - #7508.93000)

Chapter 3 extensively references the supply side of resource use (affected environment discussions) but this is the only section that refers to the demand side. Each following section needs to fold in resource demand so one reviewing the document may make a reasonable comparison of impacts. (County Elected Official, Worland, WY - 16185.71220)

**Public Concern: The proposed rule will place greater demands on international timber resources.**

Since this EIS proposes setting national policy and changing the traditional multiple-use management practices...the impacts will no doubt be global in nature. For example, the roadless proposal significantly reduces potential timber harvest...needed to meet national demands. To satisfy the timber and wood product needs of the American people, a greater demand will be placed on global markets. (Individual, Chico, CA - 10596.8500)

Why should U.S. forests not contribute their fair share to the world’s need for wood? (Individual, Durango, CO - #7647.93000)

**Public Concern: The proposed rule will not reduce overall logging levels on public forests because timber extraction quotas will be made up from different areas of the national forests.**

The roadless areas that will receive protection under this proposal will have their timber extraction quotas made up from other areas of National Forests. This plan will not reduce logging levels on public forests at all. The logging levels on National Public Forest lands will remain exactly the same. (Individual, Emerson, KY - #11238.93340)

**EXPLICITLY INCLUDE THIS OUTCOME IN AN ALTERNATIVE**

An adequate EIS must examine the reasonable alternative of accomplishing the Forest Service's objective of preventing road construction in all inventoried roadless areas in a manner that does not harm the timber production objective stated in each forest plan. The agency should do so by considering an alternative which relies on more intensive management and timber sales in roaded areas of the National Forest System to compensate for the reduced timber production from roadless areas. (Timber Company or Association, Eugene, OR - #15879.64400)

**Public Concern: The Forest Service should institute a policy to encourage the public to reduce the consumption of forest resources.**

Institute a policy aimed at reducing consumption of the resources that would potentially be extracted from the lands. (Individual, Albuquerque, NM - #12594.90000)

**Public Concern: Consumers should be taxed on the purchase of nonrenewable resources to aid in lowering the consumption of these resources.**

In the United States, a major part of government is financed by taxes based on what we earn. The federal and state income taxes raise a high percentage of all monies needed to run government. Imagine for a minute how it would effect resource stewardship if we were to shift a major part of this tax to resource consumption and, further, that that tax is primarily on consumption of nonrenewable resources. The take home check of the typical wage earner would increase substantially with little or no income taxes taken out. However, when that person went to purchase many things that cause nonrenewable resources to be consumed, the price would be higher. Using petroleum as an example, gasoline could go up 3-, 4-, or 5-fold. How would this affect resource consumption? Wouldn't more people take public transportation? When they did have to drive, they would do it in a smaller vehicle. The secondary effect of this would be less need for so many roads. Another would be fewer people killed and maimed on the highways. People would look to smaller homes, townhouses instead of huge, single-family homes, etc. In terms of resource use, the tax on consumption would really hit home directly here in the Southwest. The higher cost of nonrenewable energy would make it economical to harvest some of the small trees we so desperately need to eliminate in that biomass generation plants could then compete with coal and petroleum to supply our energy needs. (Timber Association, Medford, OR - #13658.93640)

**Public Concern: The Forest Service should the No Action Alternative because we do not know what society will need in the future.**

We need to leave our options open for the future. Do not implement any alternative of the EIS that bars road building. There is very little development planned at this time for the concerned areas so there is no danger of their being harmed and the proposal is unnecessary. At this point in time we don't know what society will need 10 or 20 years down the road much less 50 or 100. So let's not box ourselves into a corner by banning roads and

any reasonable alternative of management except nature and letting fire rule our future. (Individual, Columbia Falls, MT - #11999.72200)

**Public Concern: The Forest Service should end timber harvest in roadless areas because private timberlands can adequately supply the nation's wood product needs.**

“We also need to continue to find more national forest to protect, really, if the majority had its way, I am confident we would as a majority request no further cutting in our national forests. Please, put some thought into the health of this planet. We have enough tree plantations to gather our timber needs from. No more road construction or reconstruction or timber harvest in our roadless Forests!” (Individual, Cottage Grove, OR - #8479.10100)

The future of large-scale timbering has got to be tree-farming, on private land, in areas of faster growth – not in roadless areas of old-growth western public land. We should go ahead and admit that we’ve reached the end of the extractive regime on public lands out west. (Individual, Colorado Springs, CO - #854.93340)

**Public Concern: The Forest Service should acknowledge that current timber harvest methods do not result in the destructive effects of past practices.**

Our industry is paying for the sins of our fathers. We are not the only industry in this predicament; the salmon fishery in the northwest is hurting as well. While old time loggers cut down ancient trees even if they were too big for the local sawmill, the fish wheels harvested so many salmon that the odor in towns like Astoria was overwhelming. While we should learn from our mistakes (and we have) we should not be held accountable for actions we no longer practice that were standard operating procedure at that time. The roadless initiative is a means of saving the trees from the old time loggers who do not exist anymore. (Business/Business Association, Wallula, WA - #6512.10200)

**Public Concern: The Forest Service should end logging in the national forests.**

Please END LOGGING IN OUR NATIONAL FORESTS. Nationally, recreation generates nearly \$40 to the economy for every dollar generated by logging, and creates 30 times as many jobs. Logging destroys recreation opportunities. Plus, rural communities rely on national forests for clean drinking water and logging can clog streams with silt and runoff. (Individual, Mobile, AL - #517.63000)

Please join the ranks of preventing cutting and never more 100% clear cuts such as in Washington State. (Individual, Sandy, UT - #893.63000)

**END LOGGING IN THE PRESCOTT NATIONAL FOREST**

As residents of Prescott, Arizona, we urge all cessation of logging on the Prescott National Forest as we have seen first hand the destructive results. You have recently introduced user fees for recreation and we have seen attractive improvements including user-friendly recreation facilities. The quality of our recreational experiences in the forest is diminished both by logging and cattle grazing and both are threats to our local water supply, marginal at best. Please protect this watershed and our quality of life. (Individual, Prescott, AZ - #17669.80000)

**Public Concern: The Forest Service should assure the final rule restricts timber harvest to a much greater degree than in the Preferred Alternative.**

I appreciate your efforts to create a roadless area policy for our national forests. I do think however that too much logging could take place in roadless areas--73% of the logging could continue in roadless areas is what I understand would be allowed under the 'preferred plan.' (Individual, Redmond, WA - #6273.0100)

The [Forest] Service suggests that protection will automatically follow a prohibition on road building because damaging activities will be too expensive or difficult without roads, but where there's a will, there's a way! With modern technology, it is possible to strip an entire mountainside bare without creating a road. (Individual, Seattle, WA - #10687.93330)

**THE PREFERRED ALTERNATIVE DOES NOT MEET PRESIDENT CLINTON'S MANDATE**

According to the DEIS on the roadless area protection policy, 1.1 billion board feet of timber is slated to be cut in roadless areas between 2000 and 2004. How can this be happening when, in October, President Clinton declared over 40 million acres of roadless forests protected from such destruction? (Individual, Tolovana Park, OR - #8171.93300)

**Public Concern: The Forest Service should restrict timber harvest in roadless areas because past levels are clearly unsustainable.**

Too much of north Idaho is too dependent on timber. The past and current forest management practices, on private, State, and federal lands, have not been following sustained yield principles. It is for this reason that the timber industry and their allies want to be allowed to road (and log) the remaining roadless areas. If future generations living in north Idaho are going to be able to continue to log the forests, they must log using sustained yield practices. Past mismanagement is not an excuse to open up new roadless areas to logging. (Individual, Coeur D'Alene, ID - #2121.93700)

The myth of sustainable logging practice is belied by the practice of continuing to cut [the] few remaining pristine forests. If logging is sustainable, then at what point will the logging companies be able to reharvest the areas they replanted and not have to cut new areas? This has not happened yet, and doesn't seem to be possible in the near future, does it? (Individual, Sebastopol, CA - #3192.93300)

The logging industries' devastating impact can easily be seen from the air while traveling across the Northwest. They have not provided the "stewardship of the land" that they have advertised when campaigning for more public forest access. Instead, they simply denude entire areas leaving the ground to erode and become unable to support new growth. (Individual, Arlington, VA - #4740.41710)

Unlike the local sawmill that has to depend on one area indefinitely for timber and consequently takes care not to harm the overall ecological sustainability of that area, Weyerhaeuser of Georgia-Pacific does not have the same attachment to the land. The areas on the National Forests that are open to logging are large enough that they can clear cut as much as they want in one place, and there will always be new area to move into when an old area is depleted....The results are the industrial wastelands and barren fields of stumps that mar our public forests....We don't need any more, especially in the most biologically diverse and wild areas of our National Forests: our roadless areas. (Environmental/Preservation Organization, No Address - #1826.80000)

**Public Concern: The final rule should prohibit logging in roadless areas.**

I would not support traditional timber harvests, something that is definitely not in congruence with roadless values of an enduring nature. Timber harvest, I believe, should be limited to those areas under Matrix of other

'flexible' forest uses such as some Adaptive Management Areas if these areas are not roadless areas themselves under consideration in this Proposed rule. (Individual, Corvallis, OR - #5157.93300)

Issue nationwide direction that immediately prohibits road building and logging in all national forest roadless areas. Prohibiting not just commercial logging but also any other removal of living OR DEAD trees from roadless areas. (Individual, Ashland, OR - #527.64140)

Alternative 2 (which I understand is the agency's choice) allows "intensive logging to continue." Unchecked--and it would be unchecked, considering past policy--such logging would continue to deplete the landscape far exceeding its boundaries. There is NO such thing as self-containment: "intensive logging" (clearcutting), impacts the environment endlessly, affecting our extremely valuable and un-renewable resources such as watersheds, and wildlife species. (Individual, Sonora, CA - #8280.93310)

#### **BUFFER WILDERNESS AREAS**

I went hiking in the Bull of the Woods Wilderness Area in the Mt. Hood N.F. last week and was appalled to see the destruction forest managers had visited on the surrounding lands. There were clearcuts on every hillside as far as the eye could see. While the wilderness area was a haven of wildlife and venerable old trees, the area around it was a veritable industrial wasteland. It is unconscionable what forest managers have done to that watershed, which drains into the Clackamas River, the home of more than one threatened or endangered salmon stock. There are signs posted in the area that inform visitors to the forest that they are entering a degraded watershed, yet the Forest Service insists on continuing the destruction. There are a number of timber sales in the watershed, the most egregious of which is the Eagle sale. This sale includes no new roads, yet would destroy a precious old growth forest that borders on the Salmon-Huckleberry Wilderness Area. The Eagle sale, which was pushed through under the salvage rider and is therefore not subject to litigation, is a prime example of why the Forest Service's roadless area plan needs to be substantially improved. Even though there will be no new roads, this roadless area will be destroyed. To make matters worse, the data they are using to justify this sale and others, many of which require additional roads, is not accurate. (Individual, Portland, OR - #6276.80000)

#### **FOCUS ON SECOND-GROWTH STANDS IN ROADED AREAS TO MEET TIMBER HARVEST NEEDS**

Use the parts of those national forests that have been already logged to establish areas for SUSTAINABLE TIMBER HARVESTS. (Individual, No Address - #405.93300)

This policy will really prove to have been wise if all of us who value the National Forests for economic reasons can begin to focus on those low altitude, already developed portions of the forests as the only logical sites for timber management. Local USFS managers should be directed to do all in their power to help citizens focus on such places, and not on the generally high, fragile and remote roadless areas. (Individual, Standard, CA - #7585.84100)

The Forest Service also needs to design timber sales, where it is appropriate, in the already roaded areas, not in roadless areas. (Environmental/Preservation Organization, Bonners Ferry, ID - #10182.64120)

#### **Public Concern: The Forest Service should allow timber harvest in roadless areas because second growth in roaded areas will not be harvestable for decades.**

Contrary to what some extremists are saying, there is not enough timber accessible via the existing road system to sustain the forest products industry. Our information is that most of the available timber is second growth trees that the Forest Service will not release for harvesting until 2090 and 2150. Other areas along the road system are in "no-harvest" zones for viewing and habitat preservation. (Individual, Anchorage, AK - #13485.93300)



**Public Concern: The final rule should prohibit harvest of old growth forests.**

I am an architect, and with the new composite building products, like truss joists and OSB board, we can use second growth forests for our building products and don't need to damage old growth forests. (Individual, Shingle Springs, CA - #3116.83610)

From the information I have on this area, I am aware that some of the old growth in this forest is used for pulp production, I think that using old growth forests for pulp production is a waste of resources, and at the very least I don't think the government should be subsidizing this in any way. (Individual, No Address - #1798.93300)

Stop all old growth logging. (Individual, Cottage Grove, OR - #1466.61300)

I am deeply concerned and alarmed over the potential loss of our pristine national forests. I had hoped that your new policy would protect our national forests. Allowing the use of virgin timberland to be logged and or have roads put through is not maintaining the protection of these areas. (Individual, Ruckersville, VA - #3375.83610)

Save all Ancient Forest in America (100 years or over). (Individual, Boise, ID - #13892.83610)

**HALT LOGGING OF ANY STAND OF TREES 200 YEARS OR OLDER AND GREATER THAN 10 ACRES**

Proposed solution: stop logging of any stand of trees 200 years or older greater than 10 acres as established where growing now as a base line to prevent further/late abuses of law and land. (Individual, The Dalles, OR - #7374.61300)

**Public Concern: The Forest Service should preserve the remaining intact forests from harvest because replanted tree monocultures are an inadequate replacement.**

The continuing practice of clearcutting and planting only pine trees in return is destroying our National Forests and Parks by eliminating native habitats and food sources for our wildlife. (Individual, No Address - #2171.83500)

A variety of forest growth patterns and woody species can support an array of wildlife, while protecting watersheds. Human development of land here is fast deteriorating terrestrial and aquatic wildlife habitat. And, much of the current forest is managed to promote the growth of a particular tree species. There is nothing natural about a red pine stand, planted row by row. My own research indicates such mono-culture stands provide little habitat for bird or plant species, nor do they draw crowds of tourists! (Individual, Eagle River, WI - #1583.83000)

I have seen national forests that were logged 40 years ago next to never-logged original old growth forest. Once the forest is logged, it essentially becomes an agricultural field under the supervision of the logging company. It is no longer wild forest. In Ketchikan, Alaska, in one area of the Tongass, there is a forest logged 40 years ago that is across a footpath from a patch of old growth forest. The logged land is devoid of diversity and life: it consists of a dense mat of same-age trees that were planted by the logging company. All trees are the same size; no light enters through this dense canopy, there is no understory of smaller plants, and almost no birds, mammals or other wildlife. In short, it bears more resemblance to a field of soybeans than a natural forest. In contrast, on the other side of the footpath is a never-logged original section of old growth forest. There are trees of all ages, open areas where large trees have fallen over and died, sunlight streaming in patches, abundant understory of ferns and other plants, and these woods are crackling with life: birds of many different species, small mammals, insects, etc. (Individual, Austin, TX - #2908.83000)

**Public Concern: The final rule should not allow timber harvesting on the Tongass National Forest due to unacceptable impacts.**

Only 4% OF THE TONGASS' 17 MILLION ACRES ARE OLD GROWTH. Of course, that 4% will continue to be logged if roadless protection is not designated in your plan.

SB (Federal Senate Bill) 600 would allow up to ½ million acres including Tongass old growth to be selected by the University of Alaska. All of this land would be clear cut. There are other pending bills to give them even more land to destroy. This land that is critical to fish and wildlife habitat. Only minimum protection is being offered while clear cutting takes place. Once the trees are gone, the wildlife will soon be gone too and we will have lost even more valuable natural resources from our own planet. (Individual, Anchorage, AK - #2730.83160)

There is no science showing how roading and logging the pristine islands of the Tongass could have any positive effect on the environment. (Individual, Chico, CA - #5176.80000)

RAINFORESTS, SUCH AS IN ALASKA, ONCE CUT WILL NOT RECOVER. NEVER. The environment is very delicately balanced, with the forest itself as the creator of climate. With the forest cut, the climate is gone, the system is destroyed. I am in favor of PRESERVING all rain forests. (Individual, Chatam, VA - #8136.83600)

**Public Concern: The Forest Service should reassess the exception made in Alternative 3 for timber harvest for stewardship purposes.**

Prohibition alternative 3 forbids not only road construction and reconstruction but also timber harvest, except if it is done "for stewardship purposes." More than 65% of current logging on national forests is justified as being needed for the protection of forest health against fire, insects, and disease, which would qualify as a "stewardship purpose." This is a dangerous loophole that makes the roadless areas legislation ineffective for the long-term. (Individual, Medford, MA - #1331.64130)

**Public Concern: Alternative 3 should not allow an exception for the salvage removal of fallen and dead timber.**

Alternative 3 falls short by allowing removal of fallen & dead timber. Wood decay and fire are natural processes that are important and necessary for the health of the forests. LET THE FIRES DO THEIR JOB!! (Individual, Salt Lake City, UT - #6753.84000)

**Public Concern: The Forest Service should stop all logging projects being planned in roadless areas.**

Stop all 90 new Roadless Areas logging projects being planned in Idaho. (Individual, Sun Valley, ID - #7983.93300)

**Public Concern: The Forest Service should address whether additional timber harvest will occur after the year 2004.**

On page 3-25, the FS states 73% of the planned logging in inventoried RA's will not occur if Alternative 2 is chosen. The FS only talks about timber harvest until 2004. What happens after this magic date? Why not say the FS commits to no timber harvest after 2004 or only a certain percent? We are suspicious the FS is planning additional timber harvests after 2004. (Environmental/Preservation Organization, Bellaire, TX - #13951.93300)

**Public Concern: The Forest Service should discontinue giving Plum Creek Corporation timber credits.**

Maintain some roads, cut salvage, quit giving Plum Cr. Co. timber credits. (Individual, Plains, MT - #1746.21500)

**Public Concern: The Forest Service should continue active timber management on Forest System lands.**

Forests are dynamic systems and should be actively managed to promote resilience against destructive agents, while providing a sustainable level of wood products and recreational opportunity. I am not advocating a return to clearcuts by any means, but light thinnings and periodic under burning facilitated by a well-designed transportation access system is the type of land stewardship that should be pursued, for the sake of long-term forest health and sustainability. (Individual, No Address - #6274.84100)

Allowing selective cutting in these areas could be a win-win policy. It reduces fuel build up. It helps regenerate the forest. It creates more diverse habitat for wildlife and for human viewing. It creates jobs and a more sound tax base. And, the fire lanes and trails that would be part of the management policy would provide easier access for visitors to our National Parks and National Forests. (Individual, INTL Falls, MN - #7084.93310)

I would prefer a more efficient management of our assets by the Forest Service. The commercial timber companies have better science and management procedures than our Forest Service. Rather than allow the continuing mismanagement of our valuable assets, I would prefer the management of our forests to be contracted to the commercial timber companies with oversight by the U.S. Government. (Individual, Idaho Falls, ID - #7108.93340)

A joint industry-government scheme should be developed to allow some road building and maintenance, harvesting of recently fallen trees, and cutting of mature growth. This would help revitalize the economy in areas depressed by government prohibitions on lumbering. It would further restore woodlands where fallen trees are infested by insects and overgrown to the extent that fires such as Yellowstone and Los Alamos, set by incompetents or not, are devastating. This necessitates a balanced and reasonable plan not one drafted by environmental extremists. (Individual, No Address, #5150.64420)

**Public Concern: The Forest Service should allow roads for timber management within the National Forest System lands.**

...we were in California after a devastating fire. A long time forest ranger told us that trees are going to leave the forest one of two ways: 1- on a log truck, or 2- in smoke. My question to you as public servants is which method serves society and the environment the best??? You and I both know that planned harvest is MUCH MUCH MUCH better than the total devastation left by fire. Without roads you basically leave affordable timber harvest out of the picture. If you are planning to destroy established roads, you create more erosion than the roads cause except for some very steep areas. If part of your bottom line is to save salmon, please check with the scientists at Oregon State University. It is my understanding that up to 80% of the demise of salmon is due to ocean conditions! Roads are essential for wise and credible management of our forests both for wildlife & humans. (State Elected Official or Staff, Halsey, OR - #6917.93300)

I would like to share with you the reasons that I feel the proposed roadless area rule is not good for our nation: It means that the only types of logging and forest management must be done by more expensive types of logging like line machine logging or Helicopter logging.

It inhibits new inventive types of harvesting techniques available today. (Individual, Marion, MT - #6315.93300)

**Public Concern: The Forest Service should not adopt the proposed rule inasmuch as it is just an excuse for the fact that national forests have failed to meet their own set targets for timber production within existing forest plans.**

Over the past few weeks, comments by Forest Service personnel locally reported that this proposal was no change from the current “status quo” management of the Bitterroot National Forest. This is not a justification of this initiative, but an excuse. The Bitterroot, like most all other forests within Region One have failed miserably to meet their own set targets for timber production within the existing Forest Plans. (Business/Business Association, Hamilton, MT - #7251.93300)

**Public Concern: The Forest Service should not set aside any matrix forest as unroaded under the proposed rule.**

Another item of importance is the issue of the matrix forest and the reduction of suitable land for timber production. I do not believe any matrix forest should be declared or set-aside as unroaded, under this DEIS. (Individual, Arcata, CA - #1396.93100)

Because of the significant changes in management and use of the National Forest lands brought about by the recent implementation of the Northwest Forest Plan, there should be no net loss of matrix designated lands under this Draft EIS. If there are matrix lands within the Inventoried Roadless Areas (IRA) on the Rogue River National Forest, an area outside of the IRA's of equal size and value should be added back to the management base of the forest. (Timber Company or Association, Medford, OR - #13658.72500)

**Public Concern: The Forest Service should keep its promise to Minnesota residents regarding timber cutting outside the Boundary Waters Canoe Area.**

I particularly object to designating roadless areas in the Chippewa and Superior National Forest. Upon the passage of the 1978 BWCA bill, my constituents in Minnesota were promised that timber cutting would not be restricted outside the BWCA. These promises are now being broken. (State Elected Official, Tower, MN - #82.42000)

### 6.3.2 Silvicultural Methods

While many debate whether an alternative that restricts commercial timber harvest should be selected as the final rule, others narrow their focus to address the appropriateness of various methods used for timber harvest. Several respondents feel the Forest Service should mandate the use of better management practices. For example, many feel that the Forest Service should reevaluate harvesting practices, such as slash management. Numerous opponents of timber harvest oppose the continued use of clearcutting. Many request that the Forest Service should use alternative timber removal technologies that minimize environmental damage, such as winter harvest over snow and old-fashioned horse logging. One elected official from Oregon would like the Forest Service to address the effective range of harvester/forwarders in the Final EIS. The proposed rule should protect areas from the

creation of skid trails by forwarders and other mechanical harvesting equipment, advice some individuals who feel that the proposed rule is not restrictive enough.

If roadbuilding is prohibited, then helicopter logging should be allowed, say many people. “To the extent that the final rule may restrict forest roads, USDA Forest Service should provide incentives for using helicopters to harvest and extract logs in the most environmentally friendly manner,” writes one helicopter service. According to one individual, that means harvesting only dead or diseased trees. According to many others, however, the Forest Service should not allow helicopter or cable logging because of negative impacts on flora, fauna, and fire hazard in roadless areas. “I feel that all roadless areas should prohibit logging of all kinds. If they can’t build roads, they will only be able to use very expensive methods such as helicopters, which make only the biggest, oldest trees worth logging. This is NOT a good way to protect old growth in our national forests,” remarks one concerned citizen.

One writer suggests that the final rule should clearly state that if the trees can’t be replaced within 25 to 30 years, then they should not be cut or considered a legitimate harvest. Another requests that the Forest Service require timber contactors to replant twice the harvested acreage, and several respondents propose that the Forest Service require reforestation be carried out with more than one species of tree to avoid unhealthy second growth monocultures.

### **Public Concern: The Forest Service should mandate the use of better management practices for timber harvest.**

Loggers need to clean up THEIR act: utilize more selective cutting methods; insure less intrusive use of machinery; and leave logged areas more aesthetically pleasing. (Individual, International Falls, MN - #7084.93300)

#### **IMPROVE SLASH MANAGEMENT**

I think it is time for the USFS to fully evaluate harvesting practices on public lands such as slash management. Unmitigated slash piles do not readily return nutrients to the soils and present a constant fire hazard, especially in times of drought. (Individual, Fort Collins, CO - #358.93300)

### **Public Concern: The Forest Service prohibit clearcutting.**

I do not oppose limited road access to National Forests; and I support controlled commercial use of forest lands. However, if clear-cutting is the Forest Service’s only approach to logging, I support its ban. Clear cutting is such an eyesore, and leaving a 50’ strip uncut next to streams is ineffective for erosion control. Logging should be selective (not just the largest trees, either) and all slash removed. If that is uneconomical, then don’t log. (Individual, No Address - #13256.93300)

I must say that I am against any more Clearcuts being allowed in our forests. (Individual, Wallace, ID - #7140.93300)

I believe that relatively few parcels of USFS land support clear cutting practices. I realize this is by far the most economical way to harvest since it allows the highest degree of mechanization but it also does the greatest harm

to forest dwellers, soils, and understory and results in more homogeneous forests, which are typically more sterile in terms of biodiversity. (Individual, Fort Collins, CO - #358.93300)

**Public Concern: The Forest Service should use alternative timber removal methods to minimize environmental damage.**

**LOG OVER SNOW**

“Timber harvest has been accomplished in recreation areas when the areas are covered with snow and the results have been removing excess fuel and hazards without damaging the area to any great degree (Trinity Lark NRA). Even the California Department of Parks and Recreation did winter logging in the Tahoe Basin to reduce the fuel loading and remove the bug ravaged trees.” (Individual, Chico, CA - #10596.21300)

**LOG WITH HORSES**

Where selective cutting has to be done require that it be done with horses so as not to harm the eco-system. (Individual, Canterbury, CT - #4092.64150)

Why not utilize teamsters who work horses/oxen--in some cases. This combination has proven very successful, limiting, if not eliminating the need for roads. They can efficiently enter and exit forests when timbering, with minimal scarring of land. This certainly beats the perpetual pools of skidder oils and fluids one cannot help but notice when walking one of these roads. (Individual, No Address - #13399.93300)

**Public Concern: The Forest Service should address the effective range of harvester/forwarders.**

At what distances from the nearest road are harvester/forwarders effective, and at what steepness of ground? A helpful source for further discussion of this issue in the Final EIS is the...Blue Mountains study. (State Elected Official, Salem, OR - #18661.93330)

**Public Concern: The proposed rule should protect areas from the creation of skid trails by forwarders and other mechanical harvesting equipment.**

We are also concerned as to the failure to analyze the consequences of allowing logging within roadless areas. Equipment exists and logging methods are used which do not use roads, such as forwarders and cable yarders. Instead, the logging machines simply mow down trees standing in its path as the machine reverses out of the area it extracts the mown down trees. Technically, no road has been built, but in reality the area is fragmented and suffers the same consequences as if a road had been built by the Forest Service. According to the glossary provided with the Draft EIS, the term “road” is mutually exclusive of the term “skid road.” Nothing in the draft proposal protects these areas from skid trails. (Environmental/Preservation Organization, Plymouth, MN - #15909.32000)

**Public Concern: Helicopter logging should be allowed.**

One proposal is to completely stop logging activities in roadless areas. I’m concerned that this may not provide adequate fire protection. Perhaps you should revise the proposal to allow logging with helicopters. (Individual, Pueblo West, CO - #2175.84200)

HELICOPTERS USUALLY PROVIDE THE MOST ENVIRONMENTALLY COMPATIBLE AND COST EFFECTIVE MEANS OF ACHIEVING MANY USDA MISSIONS. To the extent that the final rule may

restrict forest roads, USDA Forest Service should provide incentives for using helicopters to harvest and extract logs in the most environmentally friendly manner. (Business/Business Association, Alexandria, VA - #29960.93330)

**ONLY WHERE SCIENTIFICALLY SUPPORTED FOR HARVEST OF DEAD OR DISEASED TREES**

I think your proposed rules should go a little farther. Selective non-impact logging (i.e. helicopter) should be allowed but only [for] dead dying diseased deformed tree species. And where true science can assure no negative impact on ecosystem species or habitat terrain. (Individual, Cusick, WA - #6764.93320)

**Public Concern: The Forest Service should not allow helicopter or cable logging because of negative impacts on flora, fauna, and fire hazard in roadless areas.**

It is not enough to just prohibit roads. Helicopter logging is more devastating for a number of reasons:

1. Logging slash is left on site (too costly to get workers there) and accumulates in “jackpots” which are highly flammable. Heli-logging slash is implicated in many of the West’s “blow-ups.”
2. The economics are bad--costs are high--and so planners just mark the “pumpkins”--the biggest trees--or plan clearcuts to save costs.
3. Invasive non-active plants are spread by helicopters. Helicopters travel widely around the West and are not regularly steam cleaned prior to movement.
4. Heli-logging opens the forest to drying sun and wind, thereby increasing fire risk. (Individual, Etna, CA - #12933.93330)

How is it possible that a National Forest, which is roadless, is being destroyed by logging companies? This makes no sense to me at all!! We need to include laws in this new bill that prohibit ALL logging and mining companies from destroying these forests. Their helicopter logging destroys acres of land every day in roadless forests along with leaving piles of slash that dry out and serve as tinder for forest fires and a breeding ground for beetles. Then there is cable logging which can move over 100,000 board-feet a day in timber and is done on steep slopes which then cause erosion and landslides. Along with having devastating impacts on streams and fisheries. (Individual, Madison, WI - #6899.80000)

Many creatures that need old growth forest and/or large uninterrupted forest (fisher, lynx, wolverine, etc.) are in decline. Commercial logging via cable, helicopter or any other means would destroy the last place that these animals can survive. (Individual, Bend, OR - #6725.83500)

From what I have observed, aerial methods of timber removal, i.e., helicopter and aerial cable, results in increased concentrations of ground fuels that increase fire potential. Slash from these timber cutting methods have historically been left untreated. If such logging methods are allowed in roadless areas in the future, it can be expected as slash will undoubtedly be untreated and allowed to accumulate. This, of course, is a very undesirable situation. (Individual, Driggs, ID - #6846.84100)

I feel that all roadless areas should prohibit logging of all kinds. If they can’t build roads, they will only be able to use very expensive methods such as helicopters, which make only the biggest, oldest trees worth logging. This is NOT a good way to protect old growth in our national forests. (Individual, Asheville, NC - #612.93300)

**Public Concern: The rule should clearly state that if the trees can’t be replaced within 25 to 30 years maximum, then they should not be cut or considered a legitimate harvest.**

It’s time to stop the rape and destruction of our environment. These forests, so-called ‘public domain’ have been referred to time and again as renewable crops. That is patently ludicrous. The law should be clear that if the

trees can't be replaced within 25 to 30 years maximum, then it should not be cut; should not be considered a legitimate harvest. Our public domain is all that is left of our inheritance and rightly belongs to the earth itself and to our natural ecology of which human beings are only a part, albeit an incredibly unwise and destructive part. You are the one who stands in the breach and can call a halt to the senseless and greedy destruction of so many years standing. (Individual, Portland, OR - #4676.93300)

**Public Concern: The Forest Service should require that timber contactors replant twice the harvested acreage.**

A suggested solution: For every acre harvested the harvester must replant the area forested and plant another acre on public or private land. (Individual, Solidew, WY - #3509.84600)

**Public Concern: Reforesting should be carried out with more than one species of tree.**

...I see some of the terrible effects of poor stewardship; for instance, timber companies "reforesting" areas with one kind of tree only which leaves a very strange environment of straggly, unhealthy trees which even the birds seem to avoid. (Individual, Ashland, OR - #5434.93300)

...plant more diversity of trees instead of monoculture that causes so many problems. (Individual, Charlotte, NC - #6833.93340)

I come from the Upper Peninsula of Michigan where logging and mining were a way of life. Now city streets are falling in, they are importing wild life and it's not working, they promised to replace the trees and did some of that with scrub pines that blow over in the wind. (Individual, Virginia Beach, VA - #3160.8000)

### 6.3.3 Adequacy of Analysis

Those who question the adequacy of analysis and information presented in the Draft EIS represent all points of view. Many request that the Final EIS include more in-depth information regarding current and projected timber harvest statistics. One timber company requests the Forest Service explain how timber management alters the characteristics of a "roadless area." Some request that the Forest Service disclose the likely effects of the proposed rule on the mix of stewardship and commodity timber harvesting. One environmental organization disagrees with conclusions stated in the Draft EIS that are based on its data, and requests that the Final EIS include an analysis of logging levels by volume and elevation classes to present a more appropriately scaled analysis of the potential benefits of including the Tongass National Forest. "While we provided many of the databases on protected areas for the DEIS analysis as cited in the DEIS (DellaSala et al. 2000, in review), we disagree strongly with the statement that 'while so much of Alaska is already protected, the actual benefits to biodiversity are proportionately much less than in other states (3-62),' " protests this organization.

Many stakeholders would like the Forest Service to provide site-specific information about the effects of the rule on timber harvest levels of specific forests. Some feel that the Forest Service should correct claims of decreased clearcutting on the national forests in the Draft EIS by including the amount of all even-aged harvest methods. One individual questions the



legality of increased timber harvest unit expansions in the Tongass without NEPA analysis. The Forest Service should provide updated project level timber harvesting information, request both timber companies and environmental organizations. “Forests should be requested to provide additional information about scheduled projects, and in the Final EIS some evaluation of the reliability of the data for projects should be included,” remarks one organization. Many elected officials, environmental groups and individuals request that the Forest Service conduct a quantitative analysis of suitable timber base in roadless areas and better evaluate the effects of the rule on timber sale volumes. Finally, some would like the same analysis for the effects of the proposed rule on allowable sale quantities and timber suitability outside of roadless areas.

**Public Concern: The Forest Service should explain how timber management alters the character of a roadless area.**

Does timber management, in and of itself, alter the character of a “roadless area”? If so, how? (Timber Company or Association, Rapid City, SD - #15900.93300)

**Public Concern: The Forest Service should disclose the effects of the proposed rule on the mix of stewardship and commodity timber harvesting.**

Page 3-115, Alternative 2, 2nd paragraph--This discussion states that the effects on the mix of stewardship and commodity purpose timber harvest is unknown. Why? With the resources the agency has to prepare this document, its Natural Resource Agenda, and all the scientific knowledge it alleges to have, it is inconceivable that the agency cannot determine the effects on the environment, communities, social factors, and harvest levels. If the Forest Service cannot determine these effects, it cannot make an informed decision of this magnitude and scope. Can you somehow disclose the mix of stewardship and commodity harvest? Our local communities and businesses cannot plan a future without knowledge of the effects that this Federal decision will have on them. (County Elected Officials, Dillon, MT - #17297.93100)

**Public Concern: The Final EIS should include an analysis of logging levels by volume and elevation classes to present a more appropriately scaled analysis of the potential benefits of including the Tongass National Forest.**

The Tongass National Forest in southeast Alaska has been recognized by World Wildlife Fund as an area of global conservation significance. Roughly 1/4 of the world’s temperate rainforests occur in this region, including many of the nation’s largest intact watersheds and low-elevation forests (DellaSalla et al. 1996). Despite its global and national significance, however, up to 90% of low-elevation, high volume old-growth has been logged on the Tongass since the early 1950s (DellaSala et al. 1996). BECAUSE LOW-ELEVATION, HIGH VOLUME OLD-GROWTH FORESTS ARE OF HIGH CONSERVATION VALUE, WE REQUEST THAT THE FEIS INCLUDE AN ANALYSIS OF LOGGING LEVELS BY VOLUME AND ELEVATION CLASSES AND HOW THE PREFERRED ALTERNATIVE WILL IMPACT ROADLESS AREAS IN THESE IMPORTANT FOREST TYPES THROUGH ROAD BUILDING AND LOGGING ACTIVITIES ACROSS ALTERNATIVES. While we provided many of the databases on protected areas for the DEIS analysis as cited in the DEIS (DellaSala et al. 2000, in review), we disagree strongly with the statement that “while so much of Alaska is already protected, the actual benefits to biodiversity are proportionately much less than in other states (3-62).” The DEIS undervalues the need for additional protection to roadless areas on the Tongass for the following reasons: Levels of protection for Alaska are based on percentage estimates only applied at the scale of the entire ecoregion and do not include representation assessments (e.g., GAP analysis)

that are specifically designed to identify gaps in protected areas within the ecoregion. Most protected areas in southeast Alaska, fail to capture low-elevation, high volume old-growth forest, under-representing this important habitat type. Because of the Tongass National Forest's ranking as "globally outstanding," losses to biodiversity values have far greater impacts than in areas of lower biodiversity significance.

The Tongass National Forest contains a large proportion of the nation's last intact forests that are vital for maintaining viable populations of many species that are in trouble elsewhere across their range. Because of its vastness, the Tongass is especially important in maintaining large-scale ecosystem services such as carbon sequestration and amelioration of global climate change. The Tongass is perhaps the last place in North America where opportunities still exist to combine representation approaches related to the location and importance of protected areas (i.e., particularly through roadless conservation) with more sustainable timber harvest levels (i.e., by limiting harvest to a 1/4 - 1/2 mile buffer around existing roads). Because the Tongass is a humid (i.e., temperate rainforest) environment with high stream densities, reduction in roads is especially beneficial to fish and watershed values particularly since such areas would require the greatest drainage structures to build roads (p. 3-25). (Environmental/Preservation Organization, Ashland, OR - #13522.83422)

**Public Concern: The Forest Service should address the effects on timber harvest levels of specific forests.**

Will impacts on timber harvest on the Caribou be at a higher percent than those percentages shown in the slide show? (Individual, Pocatello, ID - #2959.93300)

The significant impact to Beaverhead County as a result of a "Recreation Management Test" conducted in 1992 and the continued emphasis placed on recreation in this county has never been addressed. (County Elected Official, Dillon, MT - #17297.91000)

**Public Concern: The Forest Service should correct claims of decreased clearcutting in the Draft EIS by including the amount of all even-aged harvest methods.**

On page 3-11, we dispute the decrease in clear cutting acres the FS says has occurred. Seed tree, shelter wood, salvage, and SPB logging are clear cuts by other names. (Environmental/Preservation Organization, Bellaire, TX - #13951.31100)

FS uses the wrong words to describe patch clear cutting. The FS calls it group selection but group selection is not several acres to 5 acres in size. This is the size of patch clear cutting. Group selection should be no larger than 1/4 acre and in most instances is just a fraction of an acre. The FS has corrupted the term group selection for its own even age, clear cutting preference. (Environmental/Preservation Organization, Bellaire, TX - #13951.31100)

**Public Concern: The Forest Service should address the expansion of timber harvest units to increase volume output in the Tongass and whether an EIS must be completed for this.**

Now I don't really want to stop logging, but I have a real problem with the management that's been done on the Tongass so far with it being high graded and also unit expansion where they go in and they expand a unit because it didn't get enough volume out of it. But where they expanded it, was that ever under any kind of EIS? I think that's illegal. (Individual, Ketchikan, AK - #23863.93300)

**Public Concern: The Forest Service should provide current baseline timber harvesting information.**

The DEIS shows Forest Service has substantially reduced its plans to enter roadless areas to conduct projects. The No Action alternative in the roadless policy DEIS outlines fairly limited activities in the next five years for road construction and timber harvest. However, the DEIS probably overstates the likely activities because many Forests have not revised their five-year projections for projects and supplied old projections in response to the request for information. Forests should be requested to provide additional information about scheduled projects, and in the final EIS some evaluation of the reliability of the data for projects should be included. (Environmental/Preservation Organization, No Address - #15883.90010)

ALTERNATIVE ONE - No Prohibition, which we support, should have portrayed Forest Plan outputs not output average for years 1997, 98, and 99. To select outputs from this time period, when the entire National Forest System was in gridlock, and harvest activities delayed by appeal, litigation, budgetary constraints, and administration tampering, was idiotic, arbitrary, and capricious. If this defect is not corrected in the final E.I.S., a decision will never see the light of day. Clearly, timber outputs from this period were selected because by comparison they would show little difference from projections made by the proposed alternative, and biased the entire comparison. It was strange that this comparison of outputs was made in the draft, while projections of roadless area road building in the summary document "Roadless Areas Conservation" was based on Forest Plan projections. The document authors seemed willing to mix apples and oranges to fit their agendas. (Timber Company or Association, Kamiah, ID - #43488.90010)

The document refers to the impact of timber volume reduction by using two misleading figures. The misrepresentation of using the baseline harvest data of 1996-98, mentioned above, definitely skew the analysis. The harvest level of 1996-98 is far below the average harvest level of the previous decade and thereby misrepresents the overall reduction due to the proposed regulation. The other significant misrepresentation is the failure to compare the amount planned for harvest in relations to the increment or volume grown each year. The National Forests have been cautious in proposing any timber sales in areas previously categorized as inventoried roadless areas.

Because of the present administration policy, most forests have a 5 year plan to cut much less timber than could be cut (identified in the Allowable Sale Quantity or ASQ) and in fact, has been cut in the past. So any analysis of impact using the current 5 year planned sales is much below the actual impact of the Alternatives 2 through 4. (State Elected Official, Salt Lake City, UT - #43918.90010)

The no action alternative's baseline for timber production addresses too short a time period. The baseline should be based on the current forest plan. (Local Community Organization, Carmen, ID - #8039.61100)

**Public Concern: The Forest Service should conduct a quantitative analysis of suitable timber base in roadless areas and effects of the rule on timber sale volumes.**

The analysis does not address suitable acres and ASQ. Changes in where road building is allowed will make some lands currently classified as suitable for timber harvest unsuitable. Under 36 CFR 219.14 the Forest Service has to make this determination. The change in the suitable land base will affect the ASQ. For example, if the ASQ was 25 mmbf from the entire national forest including areas that are currently roadless, it will likely be impossible to meet that ASQ for two reasons. First, much of the timber that was in the roadless area will largely not be accessible or economical, not to mention if the Forest Service chooses an alternative that bans timber harvest. Secondly, the Forest Service will probably not be able to make up the missing timber from roaded lands either due to environmental or other reasons. A decision to ban road construction in roadless areas necessitates a forest plan amendment at a minimum to adjust ASQ. This is not discussed in the DEIS. The Forest Service needs to conduct an analysis of the standing inventory of timber. The analysis in the DEIS is based on "planned" volume. The two are dramatically different. (Timber Association, No Address - #52501.93300)

That you include an honest assessment of the effects of the proposed alternatives on the moderate timber harvesting from the national forests. The DEIS states on page 3-188 that quantified effects on timber harvest only look forward to the next five years of a planned offer. Since the chief has placed a moratorium on sales in roadless areas, it's not too surprising that this doesn't show the big effect on timber sales volumes. So what I want the Forest Service to do in the FEIS is, one, show the number of suitable acres that are in the roadless areas and, two, project the long-term effect on the timber harvest. (Individual, No Address - #22065.70000)

The effect of prohibiting roadless area timber sales on the timber industry and employment would be minimal. Forgoing the entire 220 million board feet of annual timber sale offering in roadless areas over the next five years would result in only 7% reduction in the Forest Service's planned timber sale program. The impact on total U.S. timber production, which averages about 83 billion board feet per year, would be miniscule – about ¼ of 1%. Similarly, the DEIS estimates that a prohibition on roadless area logging would theoretically result in a loss of just 820 timber jobs, which is 3% of all National Forest-based direct timber jobs and less than one-tenth of 1% of all U.S. wood products employment. (Environmental/Preservation Organization, Eugene, OR - #55101.93710)

Page 3-112, second paragraph--A very important element missing from the analysis is a discussion of the suitable lands that will be affected by the "Action Alternatives." Although "capability" is discussed, e.g., the 20 cubic feet per acre threshold, "suitability" is not discussed. Each Forest Plan in the nation based its Allowable Sale Quantity (ASQ) on the amount of suitable lands available for timber harvest. This involved many factors that included capability, access, spatial distribution, growth rates, logging feasibility and other variables. Effectively removing acres from the suitable timber base due to lack of road access can significantly affect the timber management programs on individual Forests by concentrating harvest on those areas that have been previously roaded and logged.

RELIEF: The Forest Service must evaluate and disclose how "timber suitability" will be affected. Although timber suitability is not addressed as a factor in the proposed revised planning regulations, they have not been finalized and do not apply to this analysis. (County Elected Officials, Basin, WY - #43980.93100)

Forest Plan, an annual timber harvest volume from the Rogue River Under the Northwest National Forest is scheduled to be 26 million board feet. In Fiscal Year (FY) 1999, the harvest on the Rogue River National Forest amounted to 8.1 million board feet. In Fiscal Year 2000 to date, the amount of timber sold is just 300,000 board feet. If 81,417 acres of Inventoried Roadless Areas are removed from active multiple-use management as proposed in the Draft EIS, how will the Rogue River National Forest meet its goal under the NWFP in the future? (Timber Company or Association, Medford, OR - #13658.72230)

### **Public Concern: The Forest Service should address the effects of the proposed rule on allowable sale quantities and timber suitability outside of roadless areas.**

Comment: Page 116, last paragraph--The Cumulative Effects section must include a discussion of the effects on the suitable timber base and to Allowable Sale Quantity outside of roadless areas. There also needs to be a disclosure on the cumulative effect that could occur on state and privately owned timber lands as a result of implementing the "Action Alternatives." CEQ Regulations (1502.16) are very clear that the analysis will include discussions of "possible conflicts between the "Proposed Action" and objectives of Federal, regional, State, and local land use plans, policies and controls for the area concerned." This discussion is totally lacking. Relief: The Forest Service must disclose the effects of the "Proposed Action" on ASQ and timber suitability outside of roadless areas. (County Elected Official, Worland, WY - 16185.71100)

## **6.3.4 Timber Harvest, Stewardship, and Forest Health**

Overall, there appears to be more support among the general public for timber harvest activities if they are denoted forest health, fire hazard reduction, or stewardship projects.

Many people fear that the proposed rule will significantly limit the ability of Forest Service land managers to effectively access roadless areas to undertake forest management activities. Those in favor of extensive timber harvest often express the opinion that a dead tree is a wasted tree, and so timber should be harvested rather than left to burn or be destroyed by insects and disease. “Just recently, the so-called ‘controlled burn’ near Los Alamos wasted about \$110 million (wholesale) worth of lumber. Why don’t you allow the logging companies to cut the wood that you intend on burning? It would have saved an enormous amount of lumber, saved the government a lot of embarrassment, not to mention, saving Los Alamos!” concludes one advocate of active management. Allow road building for stewardship harvest, people plea, and use management practices to remove or thin trees and fuel before fire occurs. Others feel that timber harvest for fuel reduction should only occur in urban interface areas where fires may threaten towns or homes. Natural processes, such as fire, many claim, are far more destructive than logging. On the other hand, many others feel that the existing road system already provides sufficient access for management activities.

Others distinguish between stewardship harvest and ecosystem restoration. One professional society calls for the Forest Service to clearly define what the agency means by restoration forestry and to determine the most appropriate lands for experimental treatment, in consultation with independent scientists. Many feel that the final rule should permit stewardship timber harvest only to restore natural forest structure and composition, and not simply to get the cut out under another name. “The issue of ‘forest health’ is one that has been developed by the wood products industry and perpetuated by the congressional delegations of the western states to justify continued timber development, even in areas in which logging activities are economically unsupportable. The Forest Service’s own research, which has been validated by the General Accounting Office, indicates that previously logged areas are at greater risk for catastrophic fire than undisturbed forests,” submits one Montana resident. Many others express similar opinions, and call for the Forest Service to prohibit all timber removal in roadless areas.

The Forest Service should establish specific criteria to identify forest health conditions that would require entry into roadless areas, recommend others. In order to assure that stewardship harvest is not simply commercial harvest under a different name, some request that the Forest Service set clear guidelines to allow thinning in roadless areas only up to a specific maximum diameter of tree that will be removed, one individual suggesting a diameter of eight inches. Accordingly, many individuals and organizations contest the claim made in the Draft EIS that Alternative 3 will have fewer local negative effects than Alternative 4 due to benefits from stewardship timber harvest, and request that the agency reevaluate and scientifically justify this position.

Among those who advocate carefully managed stewardship harvest, some propose that the Forest Service award experimental contracts for stewardship timber harvest and contract any commercially valuable timber separately. “[R]estoration and stewardship contracts for roadless areas [should] be awarded to firms and organizations with professional experience and track records of competence in forest, fire, and restoration ecology,” they counsel. In addition, some individuals propose that “separation of the economic harvest incentive from stewardship objectives” by separating the source of funding for each of these will better meet

stewardship objectives. Still others believe that most, if not all, timber manipulation is unnecessary and potentially harmful in roadless areas. These wild forest advocates call for the Forest Service to allow natural processes to predominate in roadless areas. “I find it incredibly curious that extensive blowdowns occurred throughout the forest’s history, and wild fires have occurred repeatedly, yet, without the infinite wisdom of professional managers, the forest was lush and green and beautiful when the first white men journeyed through the area. A part of the problem is that most of us live with very short-term expectations. We expect the entirety of history to be encapsulated within our life spans. That is just not the way the natural universe operates, especially wilderness,” observes a Minnesota resident. Accordingly, many who hold this view of the natural world believe that the Forest Service should prohibit all salvage timber harvest, noting both that the dead and decaying trees provide critical habitat and play a vital role in forest ecosystems, and that forests evolved with periodic catastrophic disturbance. Others dispute this position, and feel that salvage harvest aids in the recovery of extensively damaged forests.

**Public Concern: The Forest Service should consider whether the proposed rule will restrict effective access for forest management activities.**

I feel you are tying the hands of the professional land manager. (Individual, No Address - #850.10211)

The Forest Service does a poor job of maintaining existing roads. I suppose you are trying to reduce potential costs in the future. You are also eliminating your own access for management, fire fighting and other needs. (Individual, No Address - #1155.10211)

As a former Forest Service Employee I know the importance of land vehicle access to effectively administering and monitoring forests and forest users. This is especially true during fire season where quick and adequate response means saving resources both forest and financial. In my experience, road access was critical to the effective performance of my Forest Service duties. (Individual, Boise, ID - #8101.71300)

WE ARE TERRIFIED THAT THE FEDERAL GOVERNMENT IS ABOUT TO DO THE WRONG THING TO PROTECT OUR FORESTS. The Forest Service is clearly trying to diffuse the conflict they have created with this roadless initiative by hiding the ball. The DEIS may say that logging will not be prohibited in roadless areas, however they have prohibited the most effective tool foresters have to treat the serious forest health problems that exist in our forests. That’s like taking away a surgeon’s most efficient instrument--without it the patient may die. That’s what we’re afraid of--we’re watching our forests die every day. (Individual, Salem, OR - #7386.84100)

If you prohibit reconstruction of roads, erosion will eventually close them all, creating areas that no one can get to. It will hamper fire-fighting efforts in case of a fire. Everyone who loves the outdoors will lose. The only ones to gain are the so-called environmental groups. It will boost their propaganda machine, so they can get more money and bring more lawsuits against the Forest Service and other land managers. (Individual, Snowflake, AZ - #6892.413000)

President Clinton’s proposal could also ban important forest health resource management programs that are so vital to protect our lands from being destroyed by catastrophic wildfires and insect infestations. (Individual, Westminster, CO #115.84000)

The Forest Service must be careful with statements such as “potential positive effects are expected for fire management, insect and disease management, noxious weed control, water and air quality, wildlife and fish values, and passive use values” when referring to not entering roadless areas. There are significant tradeoffs for all of these categories between roaded areas and unroaded areas. While human-caused fire ignitions may

decrease with fewer roads, lack of access to wildfires will hamper suppression efforts. While fewer roads may slow the spread of noxious weeds, forest health and insect and disease infestations may not be treated due to lack of road access. Fish habitat may benefit from fewer roads, but some fish habitat in dire need of active restoration may not occur with the lack of management access. The Agency should not use value-laden statements without a thorough analysis of tradeoffs—an analysis not found in DEIS. A proposal as sweeping as the roadless area proposal will limit future management options. There is little evidence that the Forest Service has truly done any analysis to consider the long-term implications of such a proposal. (Timber Association, No Address - #52501.93300)

### **Public Concern: The Forest Service should permit timber harvest in roadless areas for forest health.**

I want it written in the plan that: LOGGING CAN BE DONE IN THESE AREAS. This will continue forest health and control wildfires that Roadless/Wilderness areas will have. (Individual, Vonore, TN - #5713.93300)

#### **TIMBER SHOULD BE HARVESTED RATHER THAN LEFT TO BURN OR BE DESTROYED BY INSECTS AND DISEASE**

Just recently, the so-called ‘controlled burn’ near Los Alamos wasted about \$110 million (wholesale) worth of lumber. Why don’t you allow the logging companies to cut the wood that you intend on burning? IT would have saved an enormous amount of lumber, saved the government a lot of embarrassment, not to mention, saving Los Alamos! (Individual, Woodland Hills, CA - #1001.93300)

The forest is already suffering from your timber policy. Miles of dead and dying trees are going to waste. (Individual, Boise, ID - #75.93310)

In retrospect of the New Mexico fires, I would suggest it would be far better to have been able to harvest at least some of these forests than have them converted to air pollution. (Individual, Bozeman, MT - #320.83310)

In the era of the 1930s, total wildlands fire suppression worked for a while. However, the accumulation of dense growth on the forest floor enhanced the spread of disease and the catastrophic fires that ensued... Additionally this unmanageable underbrush sucked up precious water that could more appropriately be used for other purposes. The Forest Service’s stance should be to encourage lumbering interests to salvage as much of the products from the forest as is possible in burned over areas as well as selective logging of existing trees that have passed their peak of growth, to stimulate younger, disease-free trees to take their place. This stance will aid our national forests to recover. (Individual, Big Sur, CA - #1045.84000)

I am wondering why it is still impossible for federal timber that has been killed or injured to such a state, cannot get to market before it is eaten by bugs or stained by fungus. Private property harvest occurs at no loss of value to the owner. This is a disgrace and Congress and the Forest service and maybe the OMB are to blame for the loss of value. I know that Congressman Herger had been fighting to keep this waste from occurring. These are dollars that could be used to maintain the facilities including roads. Forest managers need to be able to get the job done in a timely manner so the public can realize the value of the product. The funds can go to reforestation and managing the roads and trails. (Individual, Chico, CA - #10596.93300)

#### **ALLOW ROAD BUILDING FOR STEWARDSHIP HARVEST**

The roadless plan will make it very hard for the timber industry to go in and cut the trees to thin them. Thinning the forests is a large part of the health of the forests. One of the primary problems with the forests now is that they are too thick and trees that are too close together, hence they need to be thinned. I’m not talking about clear cutting. That would be insane. I’m talking about cutting a single tree and leaving the tree next to it and then cutting the next tree and leaving the next tree that is beside that one etc. This will allow the soil nutrients and water to be properly allocated and distributed to the trees lowering the fire danger and improving the general health of the trees enormously. You can’t thin cut if you can’t get your equipment to the forest with a complex network of roads. (Individual, Grand Junction, OR - #6380.93310)

“A managed forest is a healthy forest”. This slogan illustrated that to control insect & disease infestations we should occasionally do improvement thinning, or other proven forestry activities so that the trees maintain vigorous growth. This can only be done with a network of roads. (Individual, Augusta, GA - #13666.84100)

The Chugach National Forest is presently suffering from a pandemic of spruce bark beetles which has devastated more than 100,000 acres of Forest Service land on the Kenai Peninsula. An arbitrary ban on road construction in areas along the Seward Highway which qualify as “roadless” (whether inventoried or un-inventoried) would preclude most management options (when economic viability is factored in) presently available to the Forest Service to deal with the extremely high forest mortality that has resulted from this insect problem. At this time, ecological and silvicultural considerations argue strongly against foreclosing options until the extent of appropriate management techniques can be fully assessed. (Tribal, No Address - #52495.93310)

Another example of inconsistent initiatives involves the Interior Columbia Basin Ecosystem Management Project (ICBEMP) Supplemental Draft Environmental Impact Statement, which pointed out that western white pine (*Pinus monticola*) and whitebark pine (*Pinus albicaulis*) have decreased by 95 percent of their range within the project area. The way to recover the white pine cover type is through a disturbance process that allows managers to plant blister rust resistant white pine. If we want to bring back the white pine cover type within roadless areas this will be difficult if not impossible. Without access to these areas through a road network, even if the Agency wanted to use mechanical treatment it would likely be cost prohibitive. This is not considered within the roadless evaluation. (Timber Association, No Address - #52501.93310)

I believe a healthy forest is everyone’s goal. As a timber worker I feel closer to the issue than most people. Our forests have become unhealthy because of past and current management practices. The stated goal of proposals such as the Interior Columbia Basin Ecosystem Management Project (ICEBEMP) is a return to pre-settlement of historic conditions. This is a noble goal, but is not attainable without extensive management. Just for example, what we know of historic conditions indicates inventory levels of 100 to 150 trees per acre maximum. Current inventory levels are 3 to 6 times that, both inside and outside of roadless areas. Therefore, we must remove up to 500 trees per acre to attain these project goals and achieve healthy forests. How can we do this without roads. (Individual, Colville, WA - #7191.93310)

### **Public Concern: The Forest Service should use management practices to remove or thin trees/fuel before fire occurs.**

Other than the fact that you are not helping maintain a HEALTHY forest which is supposedly your job classification, you are basically condemning the forests that have these roadless areas within them to be assured of having an explosive fire in the future. Without the proper removal of the fuels (done by mechanical logging, or removal of some sort other than the lets start a fire mentality which has proved to be expensive, not controllable and reduces the forest to ash) you will never have a healthy forest. (Individual, Foster, OR - #5484.93310)

The proper way to manage a forest is to let the timber industry come in and thin out large areas that could serve as a fire break and a refuge for animals when a fire starts. By closing off the forest, old trees will fall down and provide fuel for a fire. And as long as there is fuel, it will burn. Even if you exclude all humans, sooner or later lightning will strike and start a fire that will destroy and kill everything in its path. (Individual, Snowflake, AZ - #6892.93310)

We went to John Day and Dayville, Oregon this spring, My unemployed brother-in-law who is a log truck driver took me in the forest to show me what our government is doing. There I viewed Rust diseased trees. These trees are usable if they are cut right away. But the Forest Service say’s NO. Then he showed me where the Forest Service let forest fire burn thousands of trees. The saw mills can use them if they are used right away. But it takes the Forest Service 3 years to issue a permit, then the saw mills no longer want them. (Individual, Ewen, MI - #8321.93320)



**ONLY IN URBAN INTERFACE AREAS**

Specifically I urge you to keep all remaining roadless areas of 1000 acres or larger in our National Forests roadless. I am opposed to new mining, logging, or motorized activity in these areas, including helicopter logging, excepting cases where management is reasonably necessary to protect towns from fire. (Individual, San Rafael, CA - #7664.61310)

So called “stewardship” activity might be allowed if near human habitation in order to reduce fire risk but should generally not be used in interior areas where nature should usually be allowed to take its course. Due to these failings and concerns, we have difficulty accepting the “stewardship” logging alternative, particularly in our roadless areas. (Environmental/Preservation Organization, Seattle, WA - #10788.93310)

The Forest Service is also concerned about fire hazard in roadless areas. Unfortunately properly implemented restoration harvesting, controlled burning, and other measures to reduce fire risk are expensive and grossly under funded. It makes much more sense to use the limited funds available in currently roaded areas, particularly on the “urban interface” where there is high risk to private property. If funds increase dramatically, fire control can be expanded to roadless areas in the future. (Environmental/Preservation Organization, Seattle, WA - #10788.93600)

**Public Concern: The Forest Service should address whether natural processes, such as fire, are far more destructive than logging.**

[For] millions of years the forests have had fires that have reduced huge areas to ash. Logging is far less destructive than these fires. The ash from these fires was washed into the rivers and streams on a much larger scale than sediment from a logging operation, and the trout survived!!!! (Individual, No Address #197.83120)

We are particularly concerned with forest health management under this proposal. We have watched the USFS forsake proven management techniques now to avoid the threatened litigation of the environmental fringe as they challenge each timber sale, each thinning operation, each beetle infestation control strategy and each vegetation management plan recommended by local managers. Predictably we have a massive overgrowth of flammable material in our forests and it is only a matter of time before we create the same scenario in Idaho that is going on in New Mexico and Colorado. The right weather conditions will spark huge conflagrations and with no access as defined in this proposal, we will simply burn up our natural resources. A burned out hulk does not support higher water quality, better air quality, fishing, hunting, biological diversity, endangered species or anything else. What we will accomplish is total destruction of the resources and the beauty of Idaho. If there is some doubt as to the destructiveness of a massive fire, take a look at the Payette National Forest north of Lowman. After 10 years it is still a denuded large area that washes entire mountains into the Payette River in a rainstorm. Now this may be perfectly acceptable to some, but to us and to most Idahoans it is totally unacceptable. Business/Business Association, Boise, ID - #6472.84000)

Fires do a lot more harm to the trees and vegetation than logging out the timber. (Individual, Helena, MT - #6409.84000)

**Public Concern: The Forest Service should not build new roads because existing roads provide adequate access for management activities.**

Within the Lost River Ranger District of the Salmon Challis National Forests sufficient roads already exist to permit appropriate land management for grazing, recreation, and fire or noxious weed control. (Individual, Arco, ID - #9379.71300)

The plan allows emergency roads if people are threatened. Fire crews [can be] dropped on fire sites by plane or helicopter. No roads needed. (Individual, Missoula, MT - #12516.84200)

## **Public Concern: The Forest Service should focus management efforts on restoration.**

The damage has been great and we must put our wills, science and creativity at the service of restoring and preserving what's left. (Individual, Talent, OR - #1497.84600)

Our National Forest System is composed of just over 190 million acres, around half of which we have damaged. They need restorative action if they are to again flourish. With a few small exceptions we are not restoring this huge landscape and are instead continuing to degrade our national forests. (Environmental/Preservation Organization, Bayside, CA - #1387.84600)

Mining should not be allowed. Leave these areas alone and let them heal from man's impact. In specific areas restorative work for this healing should be allowed. (Individual, Talking Rock, GA - #800.84600)

Isn't it time to get serious about healing the land, and initiating wide-scale ecological restoration work? I would say "Yes!" to both of these questions, and I hope you will too. (Individual, Logan, UT - #1523.84600)

Allowing the continued destruction of what we proposed to save is saving nothing. The mining and logging industries keep saying they will restore these areas to a natural condition. Every evidence I've seen is to the contrary. Forests are never restored to their diversity and mining sites run off into the rivers and lakes. (Individual, Stockton, CA - #3665.84600)

If the logging companies are taking such good care of the lands that they've cut; if they've restored them as they were, why do they need to keep cutting ancient and old growth forests? Why not use them as blueprints for the restoration of what they've already cut? (Individual, Stockton, CA - #3665.84600)

## **Public Concern: The Forest Service should define what it means by restoration forestry and determine the most appropriate lands for treatment.**

We hope the next environmental document will flesh out just what constitutes stewardship logging and recognize some areas have retained a natural ebb and flow that need to progress unhindered by well-intentioned interference. Instead, the Forest Service insists upon mischaracterizing Alternative 4 as neglectful and harmful to the public. Perhaps where roadless areas are in close proximity to high population centers. But, in those unroaded documented roadless areas that abut wilderness areas or other roadless areas, this may truly do more harm than good. Solid, objective criteria should be in place before giving carte blanche permission to local folks to cut at the first sight of a southern pine beetle. (Environmental/Preservation Organization, Plymouth, MN - #51067.93300)

### **IN CONSULTATION WITH INDEPENDENT SCIENTISTS**

We [Society for Conservation Biology] urge you to consider restoration and management guidelines for roadless areas extremely carefully in your rule-making process, with the ultimate goal of preventing inappropriate or damaging logging while restoring the ecological integrity of roadless areas degraded by fire suppression, high-grading, livestock grazing, exotic species, or other ecological disruptions. Before proceeding with a sweeping policy of restoration forestry in roadless areas--or, for that matter, anywhere on national forests--the Forest Service needs to define in explicit, scientific terms what it means by restoration forestry. Independent scientists should be contracted to assist the Forest Service in determining what forest types and specific areas might benefit from active restoration and management and how such projects could be designed and implemented to maximize benefits to biodiversity while minimizing risks. (Environmental/Preservation Organization, Corvallis, OR - #6130.84600)

**Public Concern: The final rule should permit stewardship timber harvest only to restore natural forest structure and composition.**

The Proposed Rule should be MORE restrictive in that the logging that does take place in these roadless areas should be limited to stewardship logging with the objective of protecting watershed and ecosystem functions. Consistent with this objective, this logging should never include the oldest class of trees on the site; should employ low-impact equipment to reduce or eliminate damage to soils; and should be a one-time entry into an area sufficient to allow reintroduction of fire at the completion of the stewardship logging. (THE DEFINITION OF STEWARDSHIP LOGGING IS PROVIDED IN YOUR DEIS SUMMARY AND PROPOSED RULE (PAGE S-8, DEIS SUMMARY.) (State Elected Official, Salem, OR - #18661.84100)

I would urge you to move toward the alternative that permits stewardship harvest only. Then activities which promote forest health and recovery from decades of unfortunate management practices would be possible in forested roadless areas if and where they are really needed. In such cases, you could even tolerate commercial projects that enhanced the condition of the forest while producing some valued boards and fiber. (Individual, Camp Sherman, OR - #6100.84000)

We note that fire-adapted forest types, such as longleaf pine and ponderosa pine communities, in roadless areas and elsewhere, often have been degraded by many years of active or passive fire exclusion. In such cases, well-planned restoration thinning, combined with prescribed burning, to restore natural forest structure and composition is scientifically defensible. Many or most of these projects will be “noncommercial,” although some might involve commercial thinning. We see no inherent reason why restoration should not be able, at least partially, to pay for itself when a significant volume of post-suppression wood is available. Restoration activities must be pursued carefully, however, because they have the potential to do more harm than good if pursued recklessly or with hidden (or not so hidden) economic motives. (Environmental/Preservation Organization, Corvallis, OR - #6130.84100)

Past logging practices permitted and encouraged by the Forest Service have irreparably harmed many areas of the state, and rehabilitation will take untold numbers of years and dollars. What remains, including tracts of land less than 5,000 acres, should be off-limits to all but the most sensitive, scientifically-based (NOT simply timber science, but science based on biological diversity), and least-impacting logging. Frankly, at this point in time, I am not sure that that can be done, and, consequently, no logging of any kind should be permitted until a total scientific picture can be documented. (Individual, Bozeman, MT - #10908.93300)

**Public Concern: The final rule should assure that stewardship timber harvest is not standard commercial harvest under another name.**

Of special concern to me is the lack of protection from logging practices within the roadless lands of the proposal. I can see a possible need for small scale logging incorporated into carefully crafted stewardship programs to rejuvenate forest health and reduce fuel loading where past management practices have allowed this to get out of hand. But I believe this rule should protect forests from purely commercial logging and from abuses that I believe have occurred in the past that have used supposed insect control simply as an excuse to certify cutting timber. (Individual, Boulder City, NV - #1039.93310)

Beaver Park is too small to permit wildfires, so it will require active management such as cutting wildlife clearings, restoring aspen stands, and prescribed burns. This can be done without roads and we should not let the loggers with their own agenda of getting out the cut...dictate ecosystem management. (Individual, Rapid City, SD - #9935.83000)

I notice with amusement the new forestry practice of fire suppression, which is a new term for an almost clear-cut. Leaving 16-25 trees per acres is, for all practical purposes, dooming that land to be clear cut in the future with the excuse that it will not regenerate any growth on the cleared ground. (Individual, Williams, OR - #150.84200)

We are also concerned about the use of restoration harvesting in our roadless areas in many circumstances. Whereas the concept of improving “forest health” sounds appealing, this type of logging has often been used to log in areas that are ecologically sensitive, to take the best trees in a stand (i.e. high grading), to log healthy as well as unhealthy trees and to generally just continue logging with limited restriction. This was frequently done during the time of the “salvage rider” in the 1990s. The Forest Service almost always lacks funding to adequately monitor these types of operations or simply ignores this obligation in favor of self-monitoring. In other circumstances, the Forest Service feels a need to offer healthy trees in order to make a timber sale attractive to potential bidders. This is counterproductive to good forest stewardship and is often more ecologically damaging than healthful. (Environmental/Preservation Organization, Seattle, WA - #10788.93310)

#### **BAN ALL TIMBER HARVEST IN ROADLESS AREAS**

Past timber development activities have contributed significantly to ecological degradation, the destruction of fisheries, and the creation of a fire regime that presents the greatest risk in history of widespread, systemic, catastrophic fire. The issue of “forest health” is one that has been developed by the wood products industry and perpetuated by the congressional delegations of the western states to justify continued timber development, even in areas in which logging activities are economically unsupportable. The Forest Service’s own research, which has been validated by the General Accounting Office, indicates that previously logged areas are at greater risk for catastrophic fire than undisturbed forests. The plan should, accordingly, exclude all timber harvest activities, whether for “commercial thinning,” “salvage,” “forest health prescription,” or any other reason. (Individual, Livingston, MT - #6716.84000)

#### **Public Concern: The Forest Service should establish criteria to identify forest health conditions that would require entry into roadless areas.**

A second criteria should be developed to establish conditions for entry into these roadless areas. Forest lands are primarily living systems that change over time. Conditions should be identified where roading is appropriate due to threats of fire, insects, or disease. This is far more appropriate because as the committee of science report points out local land managers and the public could use that criteria to consider the unique nature of roadless areas and evaluate options for desired future conditions. (University/Professional Society, Helena, MT - #11164.63000)

#### **Public Concern: The Forest Service should allow thinning of undergrowth in roadless areas if there is a protocol for the maximum diameter of stems and trunks that will be removed.**

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)

#### **RESTRICT LOGGING TO TREES EIGHT INCHES IN DIAMETER OR LESS**

Logging should be banned not only for extraction but also for responding to insect, disease, fire protection, and other prescriptive uses. One might consider banning logging except for those trees less than 8 inches in diameter to prevent such prescriptive uses being specified simply to get the cut out. David Wright, Supervisor of the Idaho Panhandle National Forests has stated clearly that logging is not banned in the Forest Service proposal and he intends to use all legal means to remove those trees which based on age (old-growth) and species are valuable to remove by helicopter, cable and forwarder. With this attitude, protection requires a total ban on destructive uses. (Individual, Spokane, WA - #19743.84000)

**Public Concern: The Forest Service should reevaluate and scientifically justify the claim that Alternative 3 will have fewer local negative effects than Alternative 4 due to benefits from stewardship logging.**

The DEIS says that alternative 4, which prohibits all timber harvest, results in slightly lower values for certain evaluation criteria such as: biodiversity, threatened/endangered sensitive species protection, and terrestrial habitat. This result is due to the Forest Service's inability to accomplish timber harvest that might have beneficial effects on these resources. We feel that the DEIS is [mis]leading in giving lower marks for alternative 4 without similarly acknowledging the clear risks of alternative 3, where stewardship logging can go awry due to the "perverse incentives"....Given the very minor risks associated with not being able to harvest timber under alternative 4, and the very real risks of perverse incentives under alternative 3, [on] balance, alternative 4 is the clearly the superior alternative. (Environmental/Preservation Organization, Eugene, OR - #55101.64140)

Over and over the DEIS claims that "stewardship logging" will have beneficial effects, but the DEIS only once acknowledges that "it has not been shown that large-scale treatment of fuels can effectively restore natural fire regimes and conditions." (page 3-53). This fact (and other similar assumptions underlying the DEIS's optimistic view of alternative 3) must be repeated in every discussion of the supposed benefits of stewardship logging and the "local negative effects" of alternative 4, see for instance fragmentation (page 3-59), "size" (page 3-66), elevation (page 3-69), and ecoregions (page 3-55). The assertions of "local negative effects" are based on an assumption that stewardship logging will be restorative which has not been proven and the DEIS must make clear throughout the analysis and in making its selection of alternatives in the Record of Decision. The FEIS must include a better description of how logging harms resources found in roadless areas. Landslides, soil compaction, fragmentation, etc. (Environmental/Preservation Organization, Eugene, OR - #55101.82000)

**Public Concern: The Forest Service should award experimental contracts for stewardship timber harvest and contract any commercially valuable timber separately.**

Competence in the conduct of restoration projects is paramount. We suggest that restoration and stewardship contracts for roadless areas be awarded to firms and organizations with professional experience and track records of competence in forest, fire, and restoration ecology. Restoration proposals should be reviewed by independent scientific peers, with performance under the contracts monitored and assessed rigorously. If commercially valuable timber is removed in a restoration project, we suggest the sale of the cut wood be executed from a separate contract, so that legitimate restoration and commodity production are not entwined. We believe that under no conditions should new roads be built to conduct restoration activities and that restoration experiments proceed cautiously, targeting mainly small roadless areas or portions of larger roadless areas first in order to test treatments in an adaptive management framework. It may be that some combination of alternatives 3 and 4 in the DEIS would provide the standards necessary to assure competent and cautious stewardship of roadless areas. (Environmental/Preservation Organization, Corvallis, OR - #6130.84600)

**Public Concern: In order to reduce fuel loads and achieve a healthier balance of flora, the Forest Service should provide funding for meeting stewardship objectives independent of the economic value of the timber that needs to be removed.**

Separation of the economic harvest incentive from stewardship objectives...in other words, funding should be provided for meeting stewardship objectives independent of [the] economic value of the timber that needs to be removed in order to reduce fuel loads and achieve a healthier balance of flora. (Individual, Winthrop, WA - #10505.93630)

## **Public Concern: The Forest Service should allow natural processes to predominate in wild forests.**

We find it notable that the forests existed for thousands of years without such intervention and believe that they can continue to exist without this additional disturbance. Local disturbances often termed as “unhealthy” will always occur but this should not always call for human intervention, as they are all part of the natural process. (Environmental/Preservation Organization, Seattle, WA - #10788.93310)

My first assertion growing out of my experiences is that professional foresters, with a few exceptions, have little understanding of the nature and value of a wilderness. They are trained to professionally “manage” the resource, with the emphasis on “manage.” Among my friends, there is almost no cognizance of any value in trees other than the economic-board feet of lumber or tons of fiber. That there may be other values seems to be a mystery to them. That totally different modes of “management” should be applied to a wilderness as compared to that applied to an industrial forest, seems to be a concept that is very hard for them to grasp. I hear them talking about the “ugly” condition of the area following the blow downs of July 4, 1999, and I hear them moan and groan about the devastating effect of a wild fire unless this situation is carefully “managed.” What is usually meant is the building of roads to recover valuable (monetarily) timber and reduce ground fuel. I find it incredibly curious that extensive blowdowns occurred throughout the forest’s history, and wild fires have occurred repeatedly, yet, without the infinite wisdom of professional managers, the forest was lush and green and beautiful when the first white men journeyed through the area. A part of the problem is that most of us live with very short term expectations. We expect the entirety of history to be encapsulated within our life spans. That is just not the way the natural universe operates, especially wilderness....

I think that there are huge lessons to be learned in the present situation in the BWCAW. First, we need to learn, and to teach that a true wilderness philosophy does not permit us to “manage” for the short term to make us think we are doing something virtuous. We need to remember that some of our short term “warm fuzzies” have turned out to be disastrous. A wilderness should be allowed to manage itself without our intervention. If we allow that we just might learn something of higher value. (Individual, Grand Rapids, MN - #7520.90240)

I know logging companies like to state they are helping the forest by removing ‘old decrepit’ timber, however, the forests got along for millions of years without human intervention, and will do so again if we let the natural balance take over. (Individual, Raleigh, NC - #329.84000)

## **Public Concern: The final rule should eliminate the exception for salvage logging after catastrophic events.**

I am also concerned about the possibility for on-the-ground abuse of the proposed exemption of “catastrophic events” from the prohibition (p. A-27, 294.12(b)(1)). The draft policy states that the exception is not intended to cover “routine forest health activities, such as temporary road construction for thinning to reduce mortality due to insect and disease infestation” (p. A-9). The final rule should specify that salvage logging either before or after natural disturbances, is prohibited to roadless areas. (Individual, Laramie, WY - #11367.93320)

[The rule] should...include [prohibition of] salvage logging following “catastrophic” events such as blowdowns for activities following fires. Too often perfectly natural events have panicked forest managers into believing the CAN DO management ethic means salvage logging and road building to remove downed trees and debris. This often results from ecological illiteracy and creates one ecological crisis after the next always relying on more and more human energy/tinkering which enhances the crisis even further. While we understand the need for flexibility to assure public health and safety is not compromised by fire or catastrophic events where they may render harm outside the sphere of a roadless landscape, the DEIS is clear that roadless areas represent a low fire risk and are in far less need of “forest health” treatments than the areas already “treated.” Thus the DEIS and rule should make it clear that salvage logging should be prohibited after natural disturbance regimes. (Environmental/Preservation Organization, Hyrum, UT - #43367.93310)

## **Public Concern: The final rule should permit salvage logging.**

Objections to Roadless Areas in the Chequamegon and Nicolet National Forests:

When a violent wind storm knocked down the trees in the Flambeau River State Forest, the tree protectionists wanted to let the damaged trees rot. Because there were roads, the salvage crews won and used the good parts. Now the foresters have looked at the difference and found the area which was salvaged is in better condition than the part which was allowed to rot. (Individual, Park Falls, WI - #13676.93320)

My constituents feel strongly about this also. In 1997 and 1998, I surveyed my House District (District 11) households and asked "Should the United States Forest Service or the Alaska Division of Forestry offer areas severely effected by spruce beetle kill for harvesting by logging companies?" In both years, over 87% of those responding to the question answered in the affirmative. (State Elected Official, Anchorage, AK - #17254.93310)

### **6.3.5 Fuel Reduction and Fire Management**

Fuel reduction and fire management are intimately related to overall forest health and timber harvest, so related concerns are found both in the previous section and in Chapter 5. Just as many are concerned with the Forest Service's continued ability to conduct effective management in roadless areas, many are specifically worried that the final rule will have negative effects on fire suppression tactics. Some would like the Final EIS to describe the effects each alternative would have on fire suppression tactics. One individual would like the forest Service to employ "management techniques that will progressively rid the areas involved" of fire hazard. Some would like the Forest Service to plan for managing catastrophic fire incidents in roadless areas.

Numerous respondents are concerned with the effects of a road building prohibition on firefighting. The Forest Service should not compromise wildland firefighters' safety by lack of roads, many avow. "If fire fighters go in to fight a bad fire they might get pinched off, trapped or even killed because there isn't a complex enough system of roads to cross and circumnavigate the fires zones. This makes the roadless issue a safety issue," concludes one Colorado resident. To reduce such risks, some call for the Forest Service to be pro-active by building roads to reduce fire risk. Others feel that road construction for emergency access should be limited to buffer area firebreaks. Many other respondents do not feel that the Forest Service should build roads into roadless areas for fire control. "The two recent major fires in Colorado were on lands that were covered with roads. The abundance of roads did not play a decisive role in the eventual control of these fires. That was accomplished mainly as a result of fortuitous rain showers. In fact, it was the roads that facilitated and encouraged access by people to the remote locations where they started the fires," counters another Colorado citizen. These respondents fear that fire management will be used as an excuse for continued road construction and logging. "The arguments to support logging are not supported . . . building roads to protect from fire is not justified. Human access and logging activities can increase fire danger. Larger, more mature trees are more resistant to fire than thin crowded stands of second growth after logging. And precisely because of natural fire, more natural areas need to be set aside to preserve them after one area burns," states an Oregon resident.

Many cite Forest Service research and other studies which conclude that timber harvest, through its effects on forest structure, local microclimate, and fuel accumulation, has dramatically increased fire severity. They assert that the Forest Service should reject commercial timber harvest for fire reduction, as it will result in precisely the opposite result. Given the changes in forest structure and increased catastrophic fire hazard caused by cattle grazing, others assert, the Forest Service should prohibit this activity in roadless areas targeted for fireproofing treatments. Others disagree, seeing grasses as a fire hazard. They feel that the Forest Service should encourage grazing in order to reduce the likelihood of fires. Others contest the assertion that roaded areas are more fire-prone than roadless areas, and think that the Forest Service should reassess this conclusion.

Many citizens request that the Forest Service consider implementing prescribed burns for fuel management. Even if alternative fuel reduction strategies such as prescribed burns are adopted more widely, however, many feel that the Forest Service should harvest some timber to control stocking levels before fire can be introduced. On the other hand, given recent events and the tragic Los Alamos fire, many are wary of an increase in prescribed burning activities by the agency. Some feel that the Forest Service should redefine and narrow the parameters for the use of controlled burning to reduce risks. Others insist that government agencies should implement a moratorium on prescribed burns.

### **Public Concern: The Forest Service should describe the effects each alternative would have on fire suppression tactics.**

Fire Suppression Comment: General--This section is well written and analyzed. However, there must be discussion on the effects all alternatives will have on fire suppression tactics. For example, will dozers be prohibited? How will burned area rehabilitation be accomplished? Are roads acceptable for fire suppression when public safety and property are not threatened? Relief: The Forest Service must identify those fire suppression practices that are acceptable. (County Elected Official, Worland, WY - #16185.84200)

Explain the dynamics and control of forest fires. (Individual, Missoula, MT - #8893.84200)

The consequences of allowing forest fires to burn out of control due to inaccessibility and the fact we have more people and homes in today's society that aren't mobile are very high. Even when we have accessibility prescribed fires are risky; ask the Los Alamos vicinity residents. These fires will not stay within their boundaries established by a political roadless solution. Any forest fire that exceeds 20 acres during summer season is a high risk for control. Hand crews won't control these fires on their own and in many cases roads and access are necessary for firefighters to move to safety or to bring essential equipment to fight fire safely. Have you evaluated the risk to our young woman and men who fight these fires such as those who died on the Storm King fires? I think not but you should when you establish management boundaries that don't address these issues. (Individual, Naches, WA - #28371.93710)

Page 3-106, paragraph 5, "The total acreage that could be potentially treated by stewardship timber harvest for fuel management objectives over the next 5 years is 14,000 acres...The total acres needing treatment compared to the acres actually being treated are so small that a direct effect cannot be established."

If the amount of area needing treatment is so large and the possibility or practicality of stewardship timber harvest on such a small acreage that an impact cannot even be established, why is this even considered a viable alternative? (State Elected Official, Salt Lake City, UT - #43918.93310)



**Public Concern: The Forest Service should adequately plan, fund, and carry out management techniques that will progressively rid the areas involved of the fire hazard due to dead fuel accumulations.**

I hope the plan is approved and carried out. THE FS MUST, however, adequately plan, fund, and carry out: management techniques that will progressively rid the areas involved of the fire hazard due to dead fuel accumulations that are the result of the many years of total fire suppression. (Individual, Missoula, MT - #7651.93620)

**Public Concern: The Forest Service should develop plans for managing catastrophic fire situations in roadless areas.**

As ecologists have finally come to accept, disturbance is a very real part of forest growth, development and demise. The forests in the roadless areas are all products of disturbance of one kind or another, often fire. I wonder how you plan to or if you plan to protect those forests from catastrophic disturbances. (Individual, Albany, OR - #5675.80000)

The more land that is managed in an “unmanned” condition, the more often these natural or man-made disasters will happen. The recent huge fire near Los Alamos, NM, is simply one example of what is going to happen with increasing frequency as use of prescribed fire increases. I have used enough prescribed fire, and fought enough fires to know that when you’ve got a large burn going, anything can happen. The more unroaded areas we have, the fewer firebreaks we have. The larger the roadless area, the more difficult and costly it becomes to fight it because of poor access. (Individual, Philipsburg, MT - 9369.84200)

**Public Concern: The Forest Service should not compromise wildland firefighters’ safety by lack of roads.**

The roadless initiative is nothing short of crazy. Number one if fire fighters go in to fight a bad fire they might get pinched off and trapped and even killed because there isn’t a complex enough system of roads to cross and circumnavigate the fires zones. This makes the roadless issue a safety issue. (Individual, Grand Junction, CO - #6380.84200)

**Public Concern: The Forest Service should be pro-active by building roads to reduce fire risk.**

Would it not be better to be pro-active by building a limited amount of roads and reduce the risk of fires? (Individual, McCall ID - #7019)

Plan must maintain present roads, even in areas under 5000 acres, expand new roads into all areas, because without access to our National Forests, more catastrophic wild fires will continue. (Individual, Florence, WI - #6667.84200)

**Public Concern: Road maintenance for emergency access should be limited to buffer area firebreaks.**

A forest should be allowed to burn if it catches fire. Road maintenance for emergency access should be limited to buffer area firebreaks. (Individual, No Address - #144.84200)

### **Public Concern: The Forest Service should not build roads into roadless areas for fire control.**

Since there are currently no roads into roadless areas, how could fire fighting be made any more difficult than it already is. Are we to expect the Forest Service to punch roads into all our roadless areas, to the tune of millions of dollars, just in case there's a wildfire? How absurd. (Individual, Idaho Falls, ID - #6848.84100)

Some people claim that lack of roads will hamper efforts to control wildfires. I think these claims are overstated. The two recent major fires in Colorado were on lands that were covered with roads. The abundance of roads did not play a decisive role in the eventual control of these fires. That was accomplished mainly as a result of fortuitous rain showers. In fact, it was the roads that facilitated and encouraged access by people to the remote locations where they started the fires. Without the roads the fires would never have occurred. (Individual, Lakewood, CO - #12965.84200)

Wherein logging may be deemed necessary for fire protection, it should be done without logging roads. (Individual, Spearfish, SD - #6559.84100)

Recently there was a forest fire in the Lost Cove (Pisgah NF) area that I suppose that roads there might have helped get firefighters in. But they got the fire out. What would it cost to build and maintain roads in order to have better access in the possible event of a fire? I'd bet that the cost of the helicopters used to ferry in the firefighters was a whole lot less. (Individual, No Address - #2405.84200)

### **Public Concern: Fire management should not be used as an excuse for road construction or logging.**

I've heard other arguments, too, that the forest will just burn down anyway, so why not cut them down and gain the advantage of timber. But, I don't buy this, as I've seen and compared the results of both logging and natural conflagration, and would much rather have the latter. It is difficult to justify with rational argument, but there is something perceptibly different between the two; perhaps we don't even have the language to describe it. But, simply put--forest fires don't seem to upset the natural setting of the land like logging and replanting does. I've seen the result of lightning-strike forest fires. It is an awesome sort of beauty, and the taller trees remain alive and unaffected in many cases. (Individual, Belding, MI - #2886.84000)

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

Commercial logging of roadless areas is NOT needed to reduce the fire risk and cure insect and disease problems, nor would such logging even be effective to address such a problem. According to scientist in the Sierra Nevada Ecosystem Project, logging is the single greatest cause of increased fire risk. The DEIS acknowledges "uncertainty" among fire researchers about the effects of timber harvest or thinning on fire risk, due to factors such as increased drying and wind (p. 3-156). Moreover, as documented in the DEIS, "Areas that [are] more highly roaded have a higher potential for catastrophic wild fires than inventoried roadless areas" (p. 3-157). In addition, "relatively few inventoried roadless areas are located near the Wildland-Urban Interface where high concentrations of people dwell, recreate, or work" (p. 3-154). Consequently, there is less need to be concerned about roadless areas fires threatening human life or property. (Environmental/Preservation Organization, Eugene, OR - #55101.84100)

**Public Concern: Timber harvest, through its effects on forest structure, local microclimate, and fuel accumulation, has dramatically increased fire severity and thus the Forest Service should reject commercial timber harvest for fire reduction.**

I would like to point out some myths and facts of logging our National Forests as my Comments on National Forest Roadless Initiative. They are as follows:

MYTH: WE NEED TO LOG OUR NATIONAL FORESTS TO PREVENT FOREST FIRES AND DISEASE.

FACT: Commercial logging does not prevent catastrophic fires, it causes them. Fire is a natural and beneficial part of forest ecosystems. Avoiding catastrophic fire risk is often used to justify logging. Ironically, according to a 1996 report by the Sierra Nevada Ecosystem Project, "Timber harvest, through its effects on forest structure, local microclimate, and fuel accumulation, has INCREASED fire severity more than any other recent human activity." Another Forest Service report, "Forest Resources of the United States" (1994), revealed that tree mortality in the West due to fire and disease INCREASES in logged areas. According to Arthur Partridge (former logger, Forest Service employee, and professor at the University of Idaho), "Claiming harm to forest health is merely an excuse to log....In terms of disease and insects there has been no difference in true forest health for at least 50 years. In fact, a report from the U.S. Forest Service indicated that between 1952 and 1992 the amount of damage from disease, insects and all other major causes including fire--was less than 1% of the standing commercial timber throughout the U.S. And the numbers stayed at those levels the entire time, with no ups and downs." (Individual, Bradford, PA - #7842.84000)

I am a former wildland firefighter and forestry aide, and therefore must comment on the timber industry's stand on logging as a means of "Fire Prevention": large timber harvest do not prevent wildland fire hazard. If anything they increase the hazard by:

- 1) leaving all the small combustible fuels behind which create the biggest risk.
- 2) creating large amounts of slash left behind.
- 3) use of flammable equipment which uses fossil fuels and generates sparks, and
- 4) taking out the large old-growth trees which in fact can withstand great heat during a prescribed understory burn (and many tree species need fire to survive).

With this in mind, I feel that the wood products industry's argument against the Roadless Conservation Area Proposal, from a fire-management standpoint, is invalid. (Individual, Corvallis, MT - #9400.93310)

In considering whether Alternative 4's prohibition of logging in roadless areas will create worse fire hazard, I'm sure these areas not having old dried up leftover logging slash must be factored in. Undisturbed high elevation forests may retain moisture a little better. (Individual, Standard, CA - #7585.84100)

Commercial logging of roadless areas is not needed to reduce fire risk and cure insect and disease problems, any ecologist will tell you that. In fact by clear cutting and logging forests, dries out the soil and the majority of biomass from plants (which 80 [percent] of the plant is underground) dries out and becomes fuel for fire. In Wyoming we have enough problems with drought clear cutting forest will not help our forest. Fire should be allowed to follow its successional rhythms of nature and not interrupted by clearcuts. (Individual, Laramie, WY - #11367.84000)

Opponents of the wild forest roadless initiative claim that protecting these areas from logging and road building will lead to increased fire risk. Here are some points to help you refute those arguments at hearings and in letters to the editor. One of the major examples that timber industry proponents point to as a symptom of the "forest health crisis" is forest fires. But the truth is, forest fires are not bad. They are a natural, integral part of the disturbance and recovery patterns of healthy forest ecosystems.

Fire dependent forest ecosystems rely on fire, often at frequent intervals, to start the renewal process allowing new trees to grow. Yet every summer, the perpetrators of the "forest health crisis" hoax take advantage of tragedies like the loss of life and property to call for more extensive logging in our National Forest. They call for new roads and extensive "thinning" and "salvage" to reduce the "fuel load."

Logging increases fire hazard by leaving behind slash and other wood that is not commercially valuable that fuels fires. This is by no means a minor problem. The Sierra Nevada Ecosystem Project report, a

comprehensive scientific study requested by Congress, concluded that “timber harvest...has increased fire severity more than any other human activity.” (Individual, Fayetteville, AR - #6991.84000)

At a hearing here in Idaho Falls last night a lot of those opposing the initiative kept talking about how it would lead to more wild fires. I don't believe that wild fire is actually an issue in this discussion either. First, fires in unroaded areas are not as severe as in roaded areas because of less surface fuel, and after fires at least some of the large trees survive to produce seed that regenerates the area. Many of the fires in unroaded areas produce a forest structure that is consistent with the fire regime, while the fires in the roaded areas commonly produce a forest structure that is not in sync with the fire regime. Fires in the roaded areas are commonly more intense, due to drier conditions, wind zones on the foothill/valley interface, high surface fuel loading, and dense stands. Of course you already know this because it comes from the ICBEMP science report. (Individual, Idaho Falls, ID - #6836.84100)

Timber-cutting, road building and fire suppression have led us to the situation we are in today, in which many of our forests are like tinderboxes waiting to explode. The areas that burned hottest in the Cerro Grande Fire had some of the highest road density in all of New Mexico's forests. In fact, all of the fires that have raged in New Mexico's forests in months have been in well-roaded areas that were clear-cut at one time or another. These activities allowed winds and the sun to dry out the forest floor, depleting groundwater, allowing build-up of undergrowth and generally altering the character of the forest. (Individual, Albuquerque, NM - #7283.84100)

**Public Concern: Given the changes in forest structure and increased catastrophic fire hazard caused by cattle grazing, the Forest Service should prohibit this activity in roadless areas targeted for fireproofing treatments.**

Cattle grazing has caused infestation of “doghair” thickets of stunted, small diameter trees. They become the “laddering” fuels allowing fire to ascend to the crowns of mature trees. Before cattle grazing, the forest floor grass out-competed pine seedlings and suppressed excessive pine regeneration. For this reason, it is important that cattle be prohibited in any roadless areas and especially those proposed for “fireproofing.” We taxpayers should not be subsidizing the private enterprise of ranchers. They are...having a negative impact on public lands. (Individual, Prescott, AZ - #17337.90340)

**Public Concern: The Forest Service should encourage grazing in order to reduce the likelihood fires.**

Biodiversity is imperative. Cattle are beneficial to reducing fire hazard by keeping grasses down. We need to encourage ranchers to continue this practice. (Individual, Sundance, WY - #18436.83400)

**Public Concern: The Forest Service should reassess the assertion that fire hazard is greater in roaded areas than it is in roadless areas.**

I thought I'd start my comments with a picture of a roadless area in Idaho. This scenic shot was taken in Elk Creek a tributary of the South Fork of the Salmon River, an important anadromous fishery. The area was a Douglas-fir Ponderosa Pine forest, which typically had frequent non-lethal wildfires. Decades of fire suppression allowed fuels to build up to unnatural levels. Fire burnt through the area in 1984 and again in 1994. A major flood occurred in 1997. The majority of the burned area is pockmarked with landslides and debris torrents. Practically all of the erosion ended up in the streams. Accelerated erosion continues today due to the oversteepened, raw, scoured draws. This condition of roadless area was not featured in your web page. This is one of many roadless areas in West Central Idaho with these conditions, resulting from uncharacteristically hot wild fires. Your sound bites (Lyon's testimony before a congressional committee for one) are saying that the fire hazard is greater in roaded areas with managed forests. “Areas that are more highly roaded actually have a

higher potential for catastrophic wildfires than inventoried roadless area” (DEIS p3-157). The wildfires of the past two decades in West Central Idaho refute that. Hundreds of thousand of acres in roadless areas have been burnt with uncharacteristically hot wildfires. Many more roadless areas are prime to burn in the near future. The amount of roaded areas burned paled to that of the unroaded areas shown in relation to the 300,000 acres of catastrophic wildfires in 1994. As you can see [map] at least 90% of the large fires occurred in roadless and wilderness. This shows the lack of site specific analysis in the DEIS. (Individual, McCall, ID - #7575.33300)

**Public Concern: The Forest Service should consider implementing prescribed burns.**

Should management activities take place? In the real world of politics this is not an issue as it is obvious that they will be right or wrong, however some management could work to our benefit. First prescription burns can work if done in colder seasons and many of our Western lodge pole stands need a fire soon to prevent a catastrophe. (Individual, Boise, ID - #1661.84100)

Burning should be allowed but only to help achieve a more natural condition and only if cost effective. (Individual, No Address - #5137.10110)

This rule could be improved by insuring that fire becomes the key USFS management tool in roadless areas. In a few cases, thinning from current roads maybe helpful, but only if it can be shown to be improving and emulating natural processes. (Individual, Moscow, ID - #7505.84100)

**Public Concern: The Forest Service should balance use of prescribed burns and timber harvest.**

The more huge fires we have, the more economic impact there will be in: (1) fighting them, (2) damage to structures, (3) damage to soil and water conditions, (4) air pollution, and (5) most importantly, threat of loss of life. If the use of prescribed fire versus good logging practices were compared in a true Cost-Benefit Analysis, I don't believe prescribed fire would stack up very high as a management tool for general forest areas. Prescribed fire has its place, such as in some wildlife improvement projects, etc., but I believe it is being relied on far too much as a substitute for judicious harvesting of forest products to remove excess fuel. (Individual, Philipsburg, MT - #9369.93000)

**Public Concern: The Forest Service should harvest timber to control stocking levels before fire can be introduced.**

First, I am against the proposal in this draft. As a professional forester who has worked on, and around Forest Service land in S.W. Idaho, I have seen the results of no management. One hundred years of fire control has resulted in overstocked stands which are insect infested, have heavy fuel loads, and fuel ladders. These stands need stocking control by commercial and pre-commercial harvest before fire can be introduced. (Individual, Boise, ID - #7370.84100)

I also realize that we have made errors in our “management” of these roadless areas in the past and have restocked them beyond their capacity to express the genetic diversity that should be inherent on a “Forest.” Thinning of some areas will help speed up the process while reducing the risk of catastrophic fires where both crown and seedbank are destroyed. (Individual, No Address - #1179.84000)

### **Public Concern: The Forest Service should redefine and narrow the parameters for the use of controlled burning.**

Several years ago I wrote a letter to the editor of the International Falls Daily Journal admonishing Voyagers National Park (VNP) for conducting a “controlled burn” on the Kabetogama Peninsula, in an areas that held stands of commercially valuable timber, and in the spring when young of the year birds and animals had virtually no chance of escaping death by fire. The recent “uncontrolled” burns set by the National Park Service (NPS) in the states of New Mexico and Montana have born out our worst fears regarding the use of “controlled burning” as a forest management tool. The destruction of private property, valuable timber, and wildlife, will be incalculable, particularly in the New Mexico burn. NO amount of controlled burning in the United States can justify the immense destruction that took place in these two states. Let us hope that valuable lessons were learned!

Federal, state, and county agencies that prescribe to controlled burning need to redefine and narrow the parameters for its use; and these parameters could be simple: “Never burn when there is even the remotest possibility that the fire could get out of control. Never burn when there is a possibility of destroying private property. Never burn in an area that holds commercially valuable timber. Never burn in the spring when young of the year birds and animals cannot escape death by fire. Fire is not selective--it destroys everything in its path!...In summary, however, we have enough forest fires now that are started by lighting strikes and man’s carelessness with fire. We DO NOT NEED an aggressive and unrestrained policy of “controlled burning” that intentionally ignites our precious forested areas. (Individual, Intl. Falls, MN - #7084.84000)

### **Public Concern: Government agencies should implement a moratorium on prescribed burns.**

After the most recent fiasco, Los Alamos, I urge a no more burning moratorium, as several wildfires have been caused by governmental bungling, including one in my area set under adverse conditions which result in a 7,000 acre runaway prairie fire. Please take the moneys for compensation from the Park Service budget not from the taxpayers and expedite the process to the victims along with an apology. (Individual, Newkirk, OK - #4207.84100)

## **6.3.6 Grazing**

Grazing on National Forest System lands is often a controversial subject for members of the public. Several respondents believe a detailed analysis should take place explaining the effects of the proposed rule on grazing allotments. County elected officials question whether the Forest Service intends to recognize “‘valid existing rights’ to include historical vehicular access used by grazing permittees.” Several individuals comment that the proposed rule should not interfere with access to range facilities and stock animals. Many people believe that grazing should be allowed on National Forest System lands and grasslands. One respondent states, “The practice of grazing within well maintained guidelines will not overly impact the areas.” This individual believes as long as livestock is rotated on a continual basis, harm to the environment will be minimal, if at all.

Conversely, many people feel grazing should be prohibited or limited to certain geographical areas on public lands. One constituent replies “these cattle are destroying the natural habitat, and they are also destroying the beautiful scenery.” Furthermore, decisions about grazing and grazing permits should be made at a national level, not left for local managers to decide, a few individuals advocate. Some suggest that the Forest Service should reduce herd size

and protect riparian areas, while another respondent recommends the Forest Service prohibit cattle grazing in riparian areas and in areas above 3,000 feet in elevation and severely limit it below 3,000 feet. This respondent suggests cattle make areas prone to xeric, biologically less diverse vegetation, and that they can directly affect forest health by removing nutrients from the biological cycle and by increasing the impacts of drought and floods. In addition, one individual calls on the Forest Service to end the practice of killing natural predators to protect domestic grazers.

**Public Concern: The final rule should provide detailed analysis of its effects on grazing allotments.**

Comment: Page 3-178, Alternatives--Allotment management plans for each grazing allotment are approved using the NEPA process. In some cases decisions have been made that conflict with the proposed rule. For example, the allotment management plan might approve the use of an existing unclassified road. The Notice of Intent for this rule recognizes that these roads currently exist and are being used. Failure to effectively maintain and monitor these roads is a violation of the spirit and intent of NEPA and the terms of Forest Service issued grazing permits. Can you address and disclose the future disposition and use of these roads? Furthermore, any decisions regarding these unclassified roads must disclose the environmental and economic effects. We are concerned about the potential impacts that include increased costs of managing and administering grazing allotments. (County Elected Official, Dillon, MT - #17297.90340)

Juab County residents have been previously damaged economically by the reduction and restriction of livestock grazing in the Uinta National Forest since the creation of the Mt. Nebo Wilderness in 1984. The AUM's have been drastically reduced to virtually nothing inside the wilderness area yet grasses and other ground feed approach "waist height" during summer months. Juab County is concerned that proposing road closures will result in even less livestock grazing. What studies, analysis, and impact reviews have been made of livestock grazing on Mt. Nebo pertaining to current and additional road closures? Please provide copies of such analysis and documentation. (County Commissioner, No Address - #47983.90310)

We also question if you truly intend for "valid existing rights" to include the historical vehicular access used by grazing permittees. This could easily be interpreted to exclude the historical vehicular access used in managing the "privileges" of a grazing permit and include such activities as construction and maintenance of fences, water developments and salting. Such use is often grandfathered in on actual Wilderness legislation and should be specifically provided for in this proposed rule. (County Elected Officials, Parowan, UT - #28911.90320)

**Public Concern: The roadless area rule should not interfere with access to range facilities and stock animals.**

We need ACCESS TO LIVESTOCK AND RANGE FACILITIES. Ranchers need roads and trails to move camps, to mend fences on grazing permits, to deliver salt and water for animals, and to get trailers in to sick or injured stock. (Individual, West Point, UT - #4008.90334)

This attempt to create roadless areas is redundant and pointless, and potentially damaging for these reasons: Roads are necessary for ranchers to maintain cattle herds grazing on public lands. (Individual, Mountain City, NV - #8455.90340)

The initiative says it would not affect existing routes of access to grazing allotments and it also says no roads or trails would be closed because of the prohibition. I hope that this will continue to be true in this and that we will continue to be able to have the roads that we necessarily need. (Individual, No Address - #22026.90340)

**Public Concern: The Forest Service should address the issue of whether livestock grazing should be permitted in roadless areas.**

**ALLOW LIVESTOCK GRAZING**

I know that the grazing of livestock is good because it does the land no harm and is a good money return of land use fees. (Individual, No Address - #2157.90334)

We presently graze sheep and some cattle in roadless areas, as long as these animals are rotated in and out at levels that sustain grasses and don't overly impact meadows these practices should be maintained. Water pollution created by grazing animals is unfortunate and can only be improved by reasonable rotation periods. The practice of grazing within well maintained guidelines will not overly impact the areas, however seeing cattle standing in a high mountain lake does not sit well with anyone who appreciates pristine country and resources so some consideration for certain truly pristine areas should be taken into account and grazing eliminated or the rotation speeded up dramatically. (Individual, Boise, ID - #1661.90340)

The policy of supporting private ranchers and livestock interests who have access to relatively cheap grazing permits on forest lands needs to be questioned; since, these interests are only involved in a subsidized form of competition with those who do not have equal access and can only graze livestock on private lands, usually at far greater expense. (Individual, Geneva, NE - #1788.90340)

**RESTRICT OR PROHIBIT LIVESTOCK GRAZING**

I visit the Cache National Forest (Logan Canyon) on average about 40+ times a year. This forest was one of my favorite places to hunt and fish until the state or federal government started to let cattle ranchers use the forest for grazing. This really makes me mad. Especially since they put the cattle in the area which I usually hunted. Nothing pisses me off more than when I am sitting in my tree stand waiting for a herd of deer or elk and instead of seeing the wildlife I see thousands of cattle. These cattle are destroying the natural habitat, and they are also destroying the beautiful scenery. I know that I am speaking for a lot of outdoorsmen when I say that the government need to get its priorities straight and save our National Forests by keeping sheep and cattle out of the forests. We all know that the ranchers have a place to keep their sheep and cattle during the winter, so why don't they keep them there all year? (Individual, Fielding, UT - #4035.91400)

I would also like to see the United States Forest Service cut back on the number of grazing permits it issues. It is a little irritating to spend a couple of hours hiking to a high country meadow to look for elk and find a couple of hundred head of cattle or sheep there. The western states have been held ransom by the ranchers for over a century and it is time for it to end. (Individual, Peetz, CO - #12932.90340)

**Public Concern: Decisions about grazing and grazing permits should be made at a national level, not left for local managers to decide.**

The DEIS states that "With respect to inventoried areas, local responsible officials could not authorize the construction or reconstruction of roads but would retain discretion to consider appropriate additional management protection for inventoried roadless areas." This statement stretches far beyond the prohibition against road building, and gives local managers the authority to determine what activities are appropriate for inventoried roadless areas. I believe that a local manager could decide that grazing or any other multiple-use activity compromises the "landscape character and scenic integrity" of an inventoried roadless area, and remove that activity. I am very worried that a manager may determine that fences and other range improvement projects violate the roadless character of an area, which may eliminate many livestock grazing allotments from being grazed properly or at all. Many local managers issue special use permits for motorized use on closed roads to maintain range improvements and for maintenance of the grazing permit, and I believe these opportunities would end under this proposed rule. (Individual, Pinedale, WY - #17692.90340)



**Public Concern: The Forest Service should place limits on grazing such as reducing herd size and protecting riparian areas.**

Limit grazing:

- 1) Reduce size of herds
- 2) Protect Riparian Areas. (Individual, Hailey, ID - #10712.90340)

**Public Concern: The Forest Service should not allow cattle grazing in riparian areas or in areas above 3,000 feet in elevation, and should severely limit grazing below 3,000 feet.**

Cattle grazing is almost as bad. It should be banned at elevations above 3,000 feet and severely limited below. Certainly cattle should be banned from riparian zones. Everywhere they make for a more xeric, biologically less diverse vegetation. They directly affect forest health by removing nutrients from the biological cycle and by making extremes of moisture and drought more devastating. (Individual, Portland, OR - #6761.90340)

**Public Concern: The Forest Service should not pay hunters to kill animals to make the public lands safe for sheep and cows.**

Oh yes, I'm against government paid hunters killing our God created creatures to make the public lands safe for sheep and cows. (Individual, Nampa, ID - #18796.90330)

### 6.3.7 Locatable and Leasable Minerals

Many respondents feel the Forest Service did not give enough detailed baseline information on leasable and locatable minerals and geological formations currently found on National Forest System lands. "There is no way to gauge the order of the magnitude of the impact of the proposed rule without the appropriate baseline information," reflect county elected officials. Officials also state that "at a minimum the description should show existing mining operations that require roads, and areas of known valuable resource deposits." Some respondents feel the Forest Service should analyze in greater detail existing mineral resources and possible restrictions the proposed rule may impose on their development. Specific mineral resources referred to are palladium/platinum resources in the Stillwater Complex; coal deposits in the Cow Creek Buttes roadless area; coal leases which overlap inventoried roadless areas in Utah; and mineral resources in Sky Lakes B roadless area.

The Forest Service should conduct inventories for the occurrence of mineral deposits before designating roadless areas, some suggest. "The following item should be inserted after Section 294.13(a)(9): "(10) Commodity resource supply potential" to ensure that the responsible official takes into account all potential uses of the land in question," asserts a mining association from Nevada. In addition, some respondents feel the Final EIS should specify the anticipated delay for processing road construction applications for mineral development while unroaded areas are being inventoried. Conversely, the proposed rule should specify that all reasonable alternatives to entry must be considered prior to exceptions for mining reclamation (CERCLA--Comprehensive Environmental Response, Compensation and Liability Act) projects. Additionally, one individual questions why conserving roadless

characteristics increases the number of areas recommended for mineral withdrawal as stated on page S-42 of the summary of the Draft EIS.

Many respondents strongly recommend the Forest Service allow mineral exploration and development activities in roadless areas. “Do we, the citizens of this nation, want to become dependent on foreign countries to supply all the minerals we require?” queries one respondent. Comments received from many mining interests contend that widespread exploration for minerals is necessary to find elusive mineral deposits. They feel that expansion of the Forest Service road system is vital to the development of energy and mineral resources extracted from public lands, which can benefit society and the economy. One individual believes that the Forest Service should clarify procedures to determine what is “considered reasonable and necessary” to develop a lease and how that determination will be made. Another individual feels that the Forest Service should not require mineral leaseholders with valid existing rights to prepare an environmental impact statement for mining exploration and development, asserting that this process is an unnecessary and expensive burden to impose on the mining industry. The mining industry, noting a recent Supreme Court decision in its favor, asserts that the Forest Service should assure that the final rule will not restrict existing mineral leases such that lessees will require federal reimbursement for leasing fees.

Many other people believe the final rule should restrict mineral development in roadless areas due to unacceptable human and environmental health risks. One individual states that “mining has caused so much damage to our forest, chemicals from mining has caused our rivers to become deadly cesspools, a polluted quagmire of a hazardous situation.” Some suggest that the Forest Service should use its statutory authority to limit access to mining claims in inventoried roadless areas to non-motorized methods or helicopters. One person suggests that the Forest Service allow only small-scale mining by hand. Others recommend the Forest Service prohibit specific types of mining such as strip mining and recreational placer mining. One environmental organization suggests the Forest Service consider all available means of restricting mineral leases, including lease expiration and prohibition of communitization agreements. Others suggest the Forest Service use its authority to withdraw roadless areas from mineral entry. To that end, some respondents request section 294.13 of the proposed rule be modified to require consideration of mineral withdrawal in the forest implementation process. Others request that the Forest Service develop regulations for “grandfathered” mining claims in roadless areas. Additionally, some encourage the Forest Service to purchase all mineral rights on National Forest System lands to stop oil and gas and hard rock mining. A few individuals request that specific roadless areas be protected from mining activity, such as the Sand Creek area in Wyoming.

Conversely, one respondent questions whether track-mounted core drills will be allowed to travel cross-country in inventoried roadless areas. Others feel the Forest Service should adequately address oil and gas operations in the proposed rule. “The Final EIS should contain a discussion of the impacts of the proposed rule on the Administration’s goals for promoting the use of clean natural gas,” asserts one person.

Many respondents feel oil and gas exploration and extraction should be allowed. One person explains that “since oil is necessary for national security, we should allow for oil exploration and inventory on these lands.” Some cite specific areas they wish to see open to continued mineral development, such as the North Dakota Grasslands and the Targhee National Forest. Other respondents feel oil and gas development should be allowed but only on a carefully controlled basis. One respondent requests the Forest Service limit the amount of methane wells allotted to a certain amount of acreage.

Certain individuals feel oil and gas development should not be allowed in the national forests because of the degradation it causes in roadless areas. One individual expresses disappointment that the Preferred Alternative does not preclude oil and gas leasing, but does restrict road access for any new leases in roadless areas.

Public Concerns specific to the legal statutes regulating mineral development are found in Chapter 3.

**Public Concern: The Forest Service should provide baseline information on leasable minerals, geology, and hard rock minerals currently found on National Forest System lands.**

Page 3-144. The description of the affected environment needs to include some description of the types of leasable minerals developed on NFS lands and the quantities of extraction. There is no way to gauge the order of the magnitude of the impact without the appropriate baseline information.

Pages 3-144 and 145. The analysis needs to include areas that have the potential for leasable minerals. Those areas that are within the unroaded portion of the roadless area should be delineated. Estimates of leasable minerals in the unroaded portion of the roadless area should be compared to leasable mineral deposits outside roadless areas. Estimates of potential losses from the prohibition of developing this resource should be addressed in the EIS. (County Elected Officials, Fallon, NV - #17290.93510)

All of the entries in these tables were derived from public Bureau of Land Management documents, yet none of this information has been cited or referenced within the DEIS or supporting documents relative to the importance of energy minerals and mining in/near proposed roadless areas. Each of these trend points shows a strong financial commitment by coal operations to secure additional leases in the region. Most of these are federal leases outside of USFS lands, but within the vicinity of the proposed roadless areas, and indicate the increased, not diminished, interest in coal leasing for the region. TO PROVIDE ACCURATE AND MEANINGFUL INFORMATION, AN INTERIM DRAFT EIS SHOULD BE DEVELOPED THAT INCORPORATES ALL APPLICABLE INFORMATION ON MINING ACTIVITIES IN/NEAR THE AFFECTED AREAS. THAT INTERIM DRAFT SHOULD BE MADE AVAILABLE FOR AN ADDITIONAL COMMENT PERIOD, TO ALLOW ALL NECESSARY INFORMATION TO BE COMPREHENSIVELY REVIEWED BY THE PUBLIC PRIOR TO ISSUANCE OF THE FINAL EIS. (Utility Group or Organization, Gillette, WY - #28925.93100)

Page 3-142 Where is the baseline description for minerals and geology. At a minimum the description should show existing mining operations that require roads, and areas of known valuable resource deposits. (County Elected Officials, Fallon, NV - #17290.93500)

In contrast to the detailed quantitative minerals analyses undertaken in compliance with the Wilderness Act of 1964, the DEIS “analyzes” the impacts to minerals exploration, development, and production activities on a general nationwide basis. This was necessary due to the limited time frame imposed by senior policy makers in the Administration, including President Clinton, resulting in the fast track of the rulemaking/EIS effort. It was also necessary due to the paucity of information used in the mineral analysis.

The Forest Service relied upon USGS maps of geographic provinces identifying areas conducive to existence of undiscovered minerals (so-called permissive tracts). Socioeconomic Specialist Report, Energy and Non-energy Minerals at G-12 to G-15. These digital maps were overlain with maps showing the inventoried roadless areas. The Forest Service then displayed the gross value of minerals estimated to be contained in those areas in which roadless areas coincided with permissive tracts. Id. Using a single map of an entire geographic region of multiple states showing permissive tracts of undiscovered mineral deposits and combined with a similar scale map of roadless areas results in a GROSS MISUNDERSTANDING of the effects of the proposal upon minerals production and economics.

The Forest Service analysis used data showing the estimates of undiscovered minerals in the permissive tracts at the 50th percentile. Id. In other words, at the 50th percentile there is an equal chance that the actual estimate of quantity is higher or lower than that estimated by the USGS. Even so, the data show that there are extremely significant undiscovered resources in the permissive tracts. I agree with the analysis that the figures in Tables G-4 to G-7 in the Socioeconomic Specialist Report are likely overestimates. However, given that the Forest Service provided no other site-specific data, we are left with the Forest Service's own conclusion that there LIKELY ARE significant undiscovered mineral deposits in inventoried roadless areas under consideration. (Mining/Oil Company or Organization, Washington, DC - #52224.90000)

### **Public Concern: The Forest Service should analyze in detail mineral resources and possible restrictions the proposed rule may impose on their development.**

Would road access be allowed to explore a lease in an area not previously roaded? Would it be possible to locate and develop a new mineral lease in roadless [areas]? (Individual, Pocatello, ID - #2959.93500)

Could phosphate leases still be granted in the interim until the proposed rules become final? (Individual, Pocatello, ID - #2959.93510)

The mining industry has indicated that the proposal disallows mining on 43 million acres of federal land. It asserts that more than \$7 trillion dollars of coal and metal resources will be placed off limits by the proposed rule. If this is not correct, then FS must explain why these resources will still be available and the approximate cost of obtaining access to the resources in areas where road construction and reconstruction is prohibited. (Federal Agency, Washington, DC - #54012.93500)

Juab County is concerned that a mineral resource analysis does not appear to have [been] performed or mapped. Whatever is not grown must be mined. The Forest Service must insure that a proper, thorough mineral resource analysis is performed including the impact on patented and unpatented mining claims and related property rights if this rule passes. Juab County requests copies of maps and other documentation detailing and describing the mineral resources in the proposed roadless areas and how these resources can be accessed if roads are closed. (County Commissioner, No Address - #47983.90320)

[O]n page 3-194, it is stated that up to a billion tons of phosphate rock (fertilizer) may exist in roadless lands in the West. Implementing a policy which bars future valid rights from ever being transferred may impact food security. The Forest Service should more fully address this additional issue and its impacts on U.S. citizens. (Individual, Whitefish, MT - #30417.93510)

The Specialist Report on "Effects Analysis for Minerals and Geology Resources," states that 68.2 miles of road construction or re-construction have been identified in inventoried roadless areas currently allocated to either a prescription that allows or disallows that activity in the forest and grassland management plans. There is no discussion of the time-frames for that activity or the basis for the figures. Is the Forest Service saying that the impact of the rule will only be on those specific 68.2 miles of anticipated roads? Is that the basis for saying that there will be little impact in the short-term? It is impossible to discern the answers to these questions from the DEIS and related analyses prepared for the public by the Forest Service. (Individual, Purcellville, VA - #15876.93100)

The proposed ruling will have a significant impact on the minerals extraction and exploration activity within the proposed roadless areas. In the DEIS Summary and Proposed Rule document, page S-20, it states that “Prohibiting road construction may reduce exploration and development activity in response to higher access costs. It may preclude future mineral leasing when reliant on road access.” It should state that it will in fact eliminate exploration and mineral extraction. Without road access, the cost of exploration activities increases phenomenally, relying solely on helicopter supported drilling and data collection. But why would a company spend any money in an area that is “roadless” when there will never be a way to extract the resource if there is a deposit found while exploring. The document would be more accurate if it stated that exploration and development will be reduced by 99.5%. (Individual, Lava Hot Springs, ID - #18244.93510)

#### **PALLADIUM/PLATINUM MINERAL RESOURCES IN THE STILLWATER COMPLEX**

How does the current DEIS address the unique, world class palladium/platinum mineral resources on the Gallatin and Custer National forests along the Absaroka-Beartooth Wilderness boundary within the Stillwater mineral complex? As background, recent Forest Service data show that in Fiscal Year 1999 the gross value of locatable mineral outputs on the National Forests was \$636 million. Of the \$150 million [that] is attributed to palladium and platinum production—almost one-fourth of the total value.

The DEIS states in one identical sentence repeated in four places, “For example, the Stillwater Mine is the only U.S. mine producing platinum and palladium as primary products.” SEE DEIS at page 3-192, page 24 of the Cost Benefit Analysis of April 19, 2000, and page 21 of the Regulatory Flexibility Analysis of April 26, 2000 and page G-6 of the Socioeconomic Specialist Report. This is the entire mineral analysis for the important Stillwater mining area that would be partially overlain by two proposed “roadless conservation” areas, covering what appears to be roughly 25% of the deposit. A more precise quantification of the overlap between the roadless areas and the Stillwater deposit is not possible at this time due to the imprecision of the available Forest Service maps. The Stillwater complex is a “layered mafic intrusive” of igneous rock which spans a surface area approximately 28 miles long by 4 miles wide. A layered mafic intrusive occurs when molten magma intrudes into sedimentary rock and as it cools segregates into distinct mineralogical and textural layers. In the case of the Stillwater, this layering is up to 18,000 feet thick. These layers contain platinum, palladium, chromium, nickel, copper, cobalt, and other minerals. The current mining by the Stillwater Mining Company (“SMC”) involves only a 3 to 8 feet layer of the 18,000-foot thick complex. (Individual, Purcellville, VA - #15876.93510)

The roadless conservation proposal will affect not only ongoing and planned development and production activities of SMC [Stillwater Mining Company], but also future mineral exploration activities of SMC and other companies. If the Forest Service proposal is adopted significant areas of the SMC mining claim group along the complex will be adversely affected. Roads will be required to construct additional ventilation shafts and escapeways to maintain safe operation of the mine. Delays in approval of surface activities necessary for underground operations will increase the cost to the company and may reduce the amount of economic reserves. See Statement of T S Ary, July 14, 2000. Bypassed mineralized areas may be lost. Changes in mining methodology may be required. (Mining/Oil Company or Organization, Washington, DC - #52224.93500)

“MOST U.S. IDENTIFIED RESOURCES OF PLATINUM-GROUP ELEMENTS (PGE) AND CHROMIUM AS WELL AS MUCH OF THE ESTIMATED UNDISCOVERED RESOURCES OCCUR IN THE STUDY AREA. The USGS estimates that an additional 3,000 metric tons of PGE resources and 4 million metric tons of chromium resources occur in extensions of known deposits. USGS mean probabilistic estimates (in metric tons) for in-place undiscovered mineral resources include: 200 tons of gold, 2,000 tons of silver, 6.5 million tons of copper, 130,000 tons of molybdenum, more than 6.5 million tons of chromium, and 230,000 tons of nickel.”...Further, the House Report (No. 95-927) which accompanied S. 1671, a bill to designate the Absaroka-Beartooth Wilderness, stated: “Although the area does contain significant mineral values, several areas containing active mining claims were excluded from the original wilderness proposal by the Senate Committee on Energy and Natural Resources. In addition, the committee recommended deletion of an area containing active mining claims above the west fork of the Stillwater River to exclude the bulk of mining claims....THIS DELETION ELIMINATES MOST KNOWN MINERAL PROVINCES FROM THE WILDERNESS (INCLUDING OVER 99 PERCENT OF THE SO-CALLED STILLWATER COMPLEX), AND SHOULD ENSURE THAT WILDERNESS AND POTENTIAL MINERALIZED AREAS DO NOT

OVERLAP.”...Similarly, the Secretary of Agriculture recognized the mineral valued and the work of the BOM and the USGS, which both provided minerals information, in his letter to Chairman Udall, Committee of Interior and Insular Affairs, House of Representatives, dated February 28, 1978. (Individual, Purcellville, VA - #15876.93510)

#### **COAL DEPOSITS IN THE COW CREEK BUTTES ROADLESS AREA**

The DEIS states that in the Powder River Basin, 87 percent of the coalfield containing inventoried roadless areas is federally owned coal. DEIS 3-197. Table 13 of the Cost-Benefit Analysis shows that the USGS estimates that the PRB contains 373 billion tons of coal worth \$6.5 trillion. The Forest Service has identified inventoried roadless areas within the TBNG in proximity to these world-class resources. The Forest Service admits that “data are not available to estimate the potential economic effects of the proposed rule on future mineral development.” Cost-Benefit Analysis at page 30.

The inventoried roadless area identified in Campell County north of Route 450 has already impacted plans for transportation of coal to Midwestern United States markets. Dakota, Minnesota, and Eastern Railroad Corporation (“DM&E”) has proposed the construction of 278 miles of new rail line to access the PRB coal fields. This new construction is planned to facilitate the transportation of 50 million tons of coal annually. The initial proposed and preferred route has since been abandoned due to the presence of the roadless area. The management of the inventoried roadless areas is only one of the many obstacles to development of this world-class coal resource. The U.S. Fish and Wildlife Service will introduce the black-footed ferret on the TBNG in the Rosecrans Cellars area of Westin County. In addition, the Medicine Bow-Routt National Forest is proposing in the Draft Grasslands Land Management Plan designation of the Cow Creek Buttes roadless area as Wilderness. (Individual, Purcellville, VA - #15876.93540)

#### **EXISTING COAL LEASES OVERLAPPING INVENTORIED ROADLESS AREAS IN UTAH**

Energy West operates two underground coal mines for PacifiCorp in the Wasatch Plateau coal region of Utah. These two mines, Deer Creek and Trail Mtn., combine for an annual production of over 7 million tons of high quality--low ash coal suitable for PacifiCorp’s power plant energy production, presently accounting for over 25 percent of the total annual coal production in Utah (1998 Annual Review and Forecast of Utah Coal Production and Distribution, State of Utah Department of Natural Resources, July, 1999)...The Trail Mtn. and Deer Creek Mines are located within the boundaries of the Manti-La Sal National Forest in central Utah. The DEIS shows locations of inventoried roadless areas on the Manti-La Sal National Forest. An overlay of independently obtained maps of existing coal leases with the DEIS roadless map shows that as much as 25 percent of those state and federal coal leases held by PacifiCorp are overlapped by inventoried roadless areas...which is the case with PacifiCorp’s recent acquisition of the Mill Fork state lease tract. Interest in other new leasing areas has been expressed by the coal industry on the Wasatch Plateau. Given that the coal potential is high, there is the likelihood that further exploration will need to occur on other state coal lease tracts (i.e. North Horn, Muddy and Cottonwood). These tracts, now under the leasing authority of the State of Utah (by exchange as part of the recent Staircase-Escalante National Monument negotiations, as was the Mill Fork tract) are overlain by surface managed by the Forest Service. No further federal coal lease tracts are available since the recent Staircase-Escalante coal land exchanges took place. (Individual, Purcellville, VA - #15876.93540)

The estimated recoverable coal on these remaining tracts on the Wasatch Plateau is greater than 200 million tons of high quality coal. These high potential areas are also overlapped with inventoried roadless areas. Although lease issuance for these tracts is under the discretion of the State of Utah, the Forest Service (as surface owner) could significantly impede the State’s coal leasing process and hinder the lessee’s ability to explore and develop leased tracts. Surface access roads for exploration purposes are necessary to further delineate coal reserves for quality and quantity, as well as assessing the technical aspects of the geologic and engineering conditions. Also, in the event of mining-induced subsidence, the lessee requires the ability to access the surface by road to mitigate any surface damage, and take other actions to aid in the reclamation process and to reduce liabilities. The DEIS at page 3-145 specifically states: “Those [exploration and development] proposals requiring road construction or reconstruction in inventoried roadless areas would not be allowed and consequently, those resources may not be leased, even though future economic circumstances may urge their development. Prohibition of road construction and reconstruction in the unroaded portions of inventoried roadless areas may cause a review of earlier forest plan decisions that identified certain NFS lands

as being available for lease, or where these lands have been scheduled for lease sales after the proposed rule becomes final. The proposed action would also likely restrict the opportunity for exploration and development of presently undiscovered leasable mineral resources in . . . inventoried roadless areas.” (Individual, Purcellville, VA - #15876.93540)

**MINERAL RESOURCES IN SKY LAKES B ROADLESS AREA**

The agency necessarily must conduct local evaluations for each roadless area and national forest. To demonstrate the errant agency assessment contained in the DEIS, we provide the following example from the Sky Lakes B Roadless Area in the Winema National Forest, Oregon, where the proposed Pelican Butte Ski Area (EIS completed) would be prohibited by DEIS. Because of insufficient time available during this abrupt public comment period, and because adequate data is not available from the Forest Service for all roadless areas, we are only able to provide this small demonstration of the wholesale error in the agency’s superficial nationwide assessment. If there were more time to complete additional assessments, we would no doubt find that the DEIS failed to adequately evaluate the consequences of the proposed prohibition on most other roadless areas across the nation. SKY LAKES B ROADLESS AREA, WINEMA NATIONAL FOREST, OREGON. Evaluation Criteria (Selected from Table S-4. Summary of Combined Effects of the Proposed Action): MINERAL LEASING DEIS says “Prohibiting road construction may...preclude future mineral leasing...” although effectively all such extraction requires the road access prohibited by the DEIS. Winema Forest Plan provides standards to govern and mitigate access to valued mineral resources (all potential future mineral leases and payments to Klamath County & schools forgone by DEIS) (Timber Company or Association, Eugene, OR - #15879.7000)

**Public Concern: The Forest Service should conduct inventories for the occurrence of mineral deposits before designating roadless areas.**

ANY AND ALL DESIGNATED AND/OR PROPOSED ROADLESS AREAS SHOULD BE THOROUGHLY STUDIED, INVESTIGATED, AND INVENTORIED FOR POSSIBLE, PROBABLE, AND/OR ACTUAL OCCURRENCE OF MINERAL DEPOSITS prior to any prohibition of new road construction or reconstruction or implementation of any other prohibitions and/or restrictions on activities in such areas. If possible, probable, and/or actual occurrence of mineral deposits is found, no prohibitions and/or restrictions should be implemented in such areas. (Individual, Eugene, OR - #8478.93500)

**Public Concern: The Forest Service should insert “(10) Commodity resource supply potential” following Section 294.13(a)(9) in the Draft EIS.**

RESPONSIBLE OFFICER MUST CONSIDER COMMODITY RESOURCE SUPPLY POTENTIAL DURING FOREST PLAN REVISION. The following item should be inserted after Section 294.13(a)(9): “(10) Commodity resource supply potential” to ensure that the responsible official takes into account all potential uses of the land in question. (Mining Organization, Reno, NV - #15907.3110)

**Public Concern: The final EIS should specify the anticipated delay for processing road construction applications for mineral development while unroaded areas are being inventoried.**

The DEIS states (at page 3.241) that the Forest Service anticipates a SHORT-TERM (5-15 YEARS) initial cost to the agency to implement the planning procedures of the roadless area conservation rule to identify and map qualifying unroaded areas of individual forests. Therefore, those wanting to exercise mineral exploration, development, and production may face a “short-term” delay of 5-15 years just for identification of unroaded areas. (Individual, Purcellville, VA - #15876.93100)

**Public Concern: The Final Rule should specify that all reasonable alternatives to entry must be considered prior to exceptions for CERCLA (Comprehensive Environmental Response, Compensation and Liability Act) projects.**

The exception for CERCLA projects should be limited to situations where no other reasonable alternatives are available that do not require road construction in the roadless portion of inventoried roadless areas. (Environmental/Preservation Organization, Eugene, OR - #55101.64351)

**Public Concern: The Forest Service should explain why conserving roadless characteristics increases the number of areas recommended for mineral withdrawal.**

Comment: Page S-42 "Increased numbers of areas recommended for mineral withdrawal" is listed as a "Human Use" effect. Explain why conserving roadless characteristics increases the number of areas recommended for mineral withdrawal. (Individual, Twain Harte, CA - #1632.93500)

**Public Concern: Roadless areas should remain open to roadbuilding for mineral exploration and development activities.**

Mining employs over 320,000 people and the direct or indirect impact on the U.S. economy totaled \$523 billion in 1995 alone. It is difficult to identify any industry or profession that does not rely on some product that is linked to mining. Is mining really something we want to do without? Do we, the citizens of this nation, want to become dependent on foreign countries to supply all the minerals we require? (Individual, No Address - #41.93500)

Critical to our nation's well-being is the discovery of new mineral deposits to replace depleted mines. Developable mineral deposits, however, are not common; concentrations of useful minerals rich enough to form ore deposits are rare phenomena. Thus, commercially extractable concentrations form only where special physical and chemical conditions have favored their accumulation. The roadless areas addressed by this proposal have a great potential for the existence of minerals. According to WILDERNESS MINERAL POTENTIAL, ASSESSMENT of MINERAL-RESOURCE POTENTIAL in U.S. FOREST SERVICE LANDS STUDIED 1964-1984, Forest Service lands under consideration for designation as wilderness lands under the Wilderness Act of 1964, "contain rocks formed in a great variety of geologic environments and many of these environments are favorable for the occurrence of mineral resources and many kinds of resources may be present." Since metals cannot begin their contribution to our economy until discovery, widespread exploration for minerals is necessary to find these elusive deposits. The procedures of basic exploration-geological mapping, geochemical and geophysical testing and drilling-must take place at many times at the cost of hundreds of millions of exploration dollars before a discovery is made. Exploration cannot, however, take place without roads. Roads provide necessary access to exploration areas and later, development of discovered ores. The Forest Service road system facilitates development of energy and mineral resources extracted from public lands, which can benefit society. The energy and mineral resources produced from National Forest lands are essential to the manufacturing, agricultural, construction, and power-generation industries and had a value of \$4.3 million in 1995. (See "Forest Service Roads: A Synthesis of Scientific Information" found on the Forest Service Web Page.) These contributions to the domestic economy were made possible by use of the Forest road system. (Mining Organization, Reno, NV - #15907.71230)

In the case of mineral resources, it is unwise to withdraw land from utilization before the resources are properly evaluated. Mining provides the greatest value per square mile of land. Impacting only a few square miles for a mine can provide hundreds of good jobs for decades. (Individual, Juneau, AK - #2764.93510)

My comments concern the Mark Twain National Forest in southern Missouri. I think the proposed roadless areas should remain open to mineral exploration activities, including mineral leasing and the construction of



temporary access roads for test drilling. All of southern Missouri has higher than average potential for the discovery of economically important metal deposits. I believe that it is unwise to disqualify large areas from mineral exploration without first assessing their economic potential. When conducted properly, test drilling has minimal impact on the forest environment. Reclaimed drill sites and roads are difficult to identify just a few years after reclamation. Finally, if we look at these “roadless” areas honestly I suspect we would find that they offer little in the way of unique visual opportunities or biohabitats. Having said that, I must add that I do support the protection of unique areas and habitats. I just believe that in most cases mineral exploration is compatible with these goals. (Individual, Farmington, MO - #7033.93500)

In Chapter 3, pages 192-197 contain a discussion of effects of these actions. It is inappropriate for the Forest Service to factor current trends in the industry into this decision. Some of the reasoning is very circular. The downward trend in the US mining industry can be closely tied to an increasingly stringent and inflexible regulatory environment. By assuming that the trend will occur and imposing yet another set of insurmountable obstacles, the Forest Service may single-handedly be responsible for the final blow to the most fundamentally necessary industry in the world--mining. (Individual, Challis, ID - #8034.91300)

**Public Concern: The Forest Service should clarify procedures to determine what is “considered reasonable and necessary” to develop a lease and how that determination will be made.**

In addition, who and how will it be determined what is “considered reasonable and necessary” to develop a lease. There is not always agreement between companies and agencies as to what is economically feasible and practical. (Individual, Lava Hot Springs, ID - #18244.93510)

**Public Concern: The Forest Service should not require mineral leaseholders with “valid existing rights” to prepare an environmental impact statement for mining exploration and development.**

As stated in the DEIS, the Proposed Action and Preferred Alternative is to prohibit road construction and reconstruction in the unroaded portions of inventoried roadless areas. For mineral activities with “valid existing rights”...preparation of an EIS likely would be required. No analysis is undertaken to support this decision other than to say that the Forest Service has determined that these actions may have a significant effect on the quality of the human environment. SEE DEIS at page 3-143.

...Designation and management of inventoried roadless areas as “roadless conservation” areas will have a significant impact on the ability of PacifiCorp--Energy West to operate its existing mines, or for any company to explore and develop possible new State of Utah leasing areas on the Manti-La Sal National Forest. New activities, according to the DEIS, will require preparation of EISs, which will take years and several hundred thousands to millions of dollars to complete. Years of delay or outright denial of operations will result in increased costs to the coal producer and the consumer (the American people who need coal-fired power plants for most of the electricity generated today). The denial and delays while EISs are completed and Forest Plans are amended or revised may necessitate the bypass of coal that would otherwise be mined in the logical order of mining. Generally, these bypassed coal deposits will not be economic in the future. (Individual, Purcellville, VA - #15876.90320)

**Public Concern: The Forest Service should assure that the final rule will not restrict existing mineral leases such that lessees will require federal reimbursement for leasing fees.**

[T]he United States Supreme Court recently held that lessees may be entitled to restitution of monies paid to the federal government following denial of certain elements of the permission-seeking opportunities promised by

the contracts. Therefore, the agency must ensure that the rule does not adversely impact existing lease contracts that have been executed by the United States. (Mining Organization, Washington, DC - #43583.50000)

**Public Concern: The final rule should restrict mineral development in roadless areas due to unacceptable human and environmental health risks.**

Mining may be the most long-term destructive use of our national resources. Certainly, no use has been more abused, especially by foreign corporations who use our outdated laws to deplete our mineral wealth. We have better long-term uses for our federal lands. NO MORE MINING. (Individual, Montclair, CA - #889.64150)

Mining has caused so much damage to our forest, chemicals from mining has caused our rivers to become deadly cesspools, a polluted quagmire of a hazardous situation. Mining must be stopped in our forests permanently. (Individual, Greenville, WI - #646.93500)

Especially abusive are the mining outfits that always leave a mess behind that often pollutes our streams with heavy metals and acids that destroy all living things. (Individual, Gualala, CA - #3357.93520)

I have a dead husband and an autistic grandchild because unknown to us, our home was built smack over an old arsenic kitchen from one of Asarco's old smelters in Everett, Washington. What's that have to do with preserving forest land? Road access will allow companies like Asarco to establish a foothold and destroy more lives. (Individual, Easton, PA - #2671.93510)

It should be noted that logging is not the only activity responsible for the vast network of roads in National Forests. According to the Daily Courier in Grants Pass, OR, "of the road construction projects planned for 1999 in Oregon and Washington, 25 were for minerals, three were for recreation, and only one was for timber." Because the main thrust of this rulemaking is to protect roadless areas from degradation caused by roadbuilding, the inclusion of mining exploration in a roadbuilding ban, prior to the establishment of a valid existing right, is reasonable and legal. (Environmental/Preservation Organization, Nevada City, CA - #50392.90320)

**Public Concern: The Forest Service should limit access to mining claims in inventoried roadless areas to non-motorized methods or helicopters.**

Access to mining claimants for the purposes of mineral exploration, prospecting, mining or processing operations on the National Forests can and should be limited to non-motorized methods or helicopter access (where necessary) in inventoried roadless areas or that overland access can and should be denied where it would impact other values such as those found in roadless areas. (Environmental/Preservation Organization, Cave Junction, OR - #16188.64150)

**Public Concern: The Forest Service should allow only small-scale mining by hand.**

I would definitely oppose large-scale mining...in these [roadless] areas because of the outright, undeniable damage that occurs. Proposed solution: allow only mining by hand and riffle washes, panning or other such methods by individuals or families of not greater than five persons. (Individual, The Dalles, OR - #7374.61300)

**Public Concern: The Forest Service should prohibit strip mining.**

Strip mining is perhaps the only activity I have ever witnessed that is more offensive than the environmental damage caused by the reckless creation of these greed motivated arteries. (Individual, Denver, CO - #4111.93500)

**Public Concern: The Forest Service should not allow recreational placer mining.**

State that recreational placer mining, which is not an economically viable mine, is not required by the 1872 Mining law and therefore not allowed in roadless areas. (Environmental/Preservation Organization, Rapid City, SD - #52237.93500)

**Public Concern: The Forest Service should consider all available means of restricting mineral leases, including lease expiration and prohibition of communitization agreements.**

As a general matter, roadless areas must not be “held hostage” to mineral rights within their borders. While we recognize certain limitations in addressing private mineral rights on national forests, we recommend the following principles be included in the final roadless area policy. First, no new mineral leases should be offered in inventoried roadless areas. Second, existing leases in inventoried roadless areas should be allowed to expire whenever possible. More specifically, the Forest Service, in coordination with the Bureau of Land Management, should review “capable of production” standards as applied to leases in roadless areas and extinguish leases no longer capable of production. In addition, existing leases within roadless areas should not be subject to communitization agreements unless all leases covered by the agreement are located entirely within the roadless area. (Environmental/Preservation Organization, Chapel Hill, NC - #52231.90320)

**Public Concern: The Forest Service should utilize its authority to withdraw roadless areas from mineral entry.**

To protect roadless areas from mining the Forest Service should:

1. Recommend to the BLM that they withdraw all roadless areas from mineral entry where there is a threat of mining or of the filing of nuisance claims. (Environmental/Preservation Organization, Beaverton, OR - #52230.93500)

We oppose hard rock mining, oil and gas drilling, and other mineral development in roadless areas. Mining has the potential to impact all of the ecological and amenity values of roadless areas--from water quality to solitude. Mining access roads are as destructive as logging roads and are often driven deep into the most remote roadless area watersheds. Mine sites become permanent scars on the land. While the proposed road construction ban would effectively curtail at least some new oil and gas drilling, it would not limit hardrock mining conducted under the General Mining Law of 1872. We urge the Forest Service to utilize its full legal regulatory authority to protect roadless values. Areas that are threatened by mining should be segregated and withdrawn from mineral development, pursuant to Section 204 of the Federal Lands Policy and Management Act. (Environmental/Preservation Organization, Eugene, OR - #55101.93500)

Mineral withdrawal procedures should be instituted whenever possible in all the remaining roadless areas of 1,000 acres or more. Full consideration should be given to instituting formal mineral withdrawal procedures at the national level. If that is again deemed inappropriate or too onerous a task, then each Regional Forester and Forest Supervisor should be directed to undertake an immediate analysis of each forest’s roadless areas with the goal of withdrawing from mining all areas that have any potential for ecologically destructive mining activities. (Individual, Prescott, AZ - #8486.93510)

I endorse withdrawal of mining rights from all inventoried roadless and other roadless areas. (County Elected Official, Hilo, HI - #13967.64150)

**MODIFY SECTION 294.13 TO REQUIRE CONSIDERATION OF MINERAL WITHDRAWAL IN IMPLEMENTATION PROCESS**

The DEIS states that impacts to roadless values from mining can be severe and that mineral withdrawal for specific roadless areas could be proposed through implementation of procedural alternatives at the local level. DEIS at 1-18. The DEIS discloses that there are presently 31 mineral exploration and development projects in inventoried roadless areas. DEIS at 3-142 & 143. We propose that [the] following language be added to the final roadless area conservation rule under § 294.13. “At the time of land and resource management plan revision and during project level analysis inventoried roadless areas and unroaded areas shall be considered for mineral withdrawal where mineral exploration and mining operations threaten roadless area integrity and values.” (Environmental/Preservation Organization, Washington, DC - #52802.93500)

...the Forest Service should consider “mineral withdrawals” for roadless areas in special circumstances. Such circumstances might include a perceived threat to a certain roadless area or areas. In addition to including these recommendations into the final policy, they should also be incorporated into individual forest plans in the Southern Appalachians during the ongoing revision process. (Environmental/Preservation Organization, Chapel Hill, NC - #52231.90320)

**Public Concern: The Forest Service should develop regulations for “grandfathered” mining claims in roadless areas.**

Develop Forest Service regulations for “grandfathered in” mining claims in roadless areas. (Individual, Sheridan, WY - #10616.90300)

I recommend that [the] BLM withdraw all roadless areas from mining entry. I suggest that [the] Forest Service develop regulations for “grandfathered in” mining claims in roadless areas. Regulations should require proof of a valid existing mining claim, and proof of a valuable mineral deposit. (Individual, No Address - #10487.93500)

**Public Concern: The Forest Service should purchase all mineral rights on National Forest System lands to stop oil and gas and hard rock mining.**

On page 3-144, the FS ignores the impacts on RA’s where mineral rights are not owned by the U.S. The FS should implement a program immediately to buy all mineral rights on National Forests to stop oil and gas and hard rock mining from devastating the “People’s Forests.” (Environmental/Preservation Organization, Bellaire, TX - #13951.93500)

To protect roadless areas we must:

All current mining operations in roadless areas should be discontinued and claims eliminated through public purchase at fair market value. (Individual, Bend, OR- #12893.93500)

**Public Concern: The Forest Service should protect specific roadless areas from mining activity.**

**THE SAND CREEK AREA**

Please protect the Sand Creek Area from mining. (Individual, Sheridan, WY - #10616.90300)

**Public Concern: The Forest Service should address whether track-mounted core drills will be allowed to travel cross-country in inventoried roadless areas.**

Would track-mounted core drills be allowed to travel cross-country in IRAs? (Individual, Pocatello, ID - #2959.93500)

**Public Concern: The Forest Service should adequately address oil and gas operations in the draft proposal.**

Oil and gas operations are not adequately addressed in the draft proposal. (Individual, Escalante, UT - #1510.93540)

Both the President and the Vice-President have been vocal supporters of increased production and utilization of clean burning natural gas as a more environmentally acceptable alternative to other fuels which produce more air pollution and acid rain. However, the draft EIS does not disclose the environmental benefits which will be lost by locking up vast reserves of natural gas (See DEIS at 3-196) by prohibiting access to those reserves. The final EIS should contain a discussion of the impacts of the proposed rule on the Administration's goals for promoting the use of clean natural gas. (Individual, Denver, CO - #29016.93540)

**Public Concern: An exception for leasable mineral development should be allowed in the final rule.**

The roadless concept is a good idea with exceptions: Since oil is necessary for national security, we should allow for oil exploration and inventory on these lands. (Individual, Cody, WY - #1813.93540)

The development of leasable minerals is a Forest Service decision. Once the proposed rule is in place, the Forest Service could not implement a decision contrary to Section 294.12. If the Forest Service is unwilling to include leasable minerals in the exceptions, Churchill County is opposed to any retroactive prohibition to development activities unless adequate mitigation measures are negotiated with affected parties and included in the Record of Decision as committed mitigation. (County Elected Officials, Fallon, NV - #17290.93510)

I recommend that the Forest Service address the status of contractual rights of access to mineral resources in the text of the Proposed Rule itself. Specifically, § 294.12 (b) should be revised to make clear that the prohibition on road construction and reconstruction in inventoried roadless areas does not apply where a road is reasonably necessary pursuant to oil and gas leases granted, previously or in the future, by the U.S. government. At minimum, the Forest Service should revise § 294.12 (b) to clarify that the prohibition on road construction and reconstruction does not apply where a road is reasonably necessary pursuant to existing oil and gas leases. (Individual, No Address - #52188.50000)

This section [294.12 (b)(3)] needs to be clarified, particularly with respect to mining claims. The analysis of the proposed rule indicates that road construction and reconstruction would be permitted for valid existing rights...under the General Mining Law of 1872. It is unclear whether roads would be permitted for claims filed after the proposed rule. The rule should be changed to clearly reflect the Forest Service's intent with respect to locatable minerals. The development of leasable minerals should also be included under this section as an exception. (County Elected Officials, Fallon, NV - #17290.53600)

For leasable minerals, the DEIS, page 3-145 states that, "Construction and reconstruction of roads considered reasonable and necessary for energy or mineral development on existing leases would be allowed as necessary to fulfill the terms of the lease." There is one very large problem with the statement, "on existing leases" doesn't allow for access TO the lease. If the rule is adopted it must state that access to, from, on and under the

lease is allowable to extract and move the resource to a processing point. (Individual, Lava Hot Springs, ID - #18244.93510)

It is our fear that where you are heading with your proposal is down the path of no new development under the guise of environmental righteousness, rather than giving access to valuable potential resources that can be produced in an environmentally sound manner. You are not only denying permits on federal land you are initiating policy to prevent access to forest land specifically by preventing road construction.

In conclusion without sound policies that support domestic production of oil and gas, our industry will never meet its potential and the county will be the worse because of it. We request the opportunity to work together with you beyond this public hearing aspect, in order to help develop a stable oil and natural gas development framework on federal forest lands. (Mining/Oil Company or Organization, Lansing, MI - #17666.93510)

#### **NORTH DAKOTA GRASSLANDS**

The Roadless Initiative will adversely affect oil production activity in the North Dakota Grasslands by restricting future oil production. In addition to drilling rigs, pipelines and other utility corridors will not be allowed if road construction is necessary for installation. (Mining/Oil Company or Organization, Mandan, ND - #13610.93540)

This “one-size fits all” regulation was written without taking into consideration the economic interests of ranchers, the oil industry and the State of North Dakota. The Roadless Initiative, if implemented, will have a devastating impact on the future of oil activity in the North Dakota Grasslands. **THE DECREASE IN THE SUPPLY OF CRUDE PLACES THE FUTURE OF THE MANDAN REFINERY AT RISK.** (Mining/Oil Company or Organization, Mandan, ND - #13610.93730)

#### **TARGHEE NATIONAL FOREST**

The proposal for roadless areas to be closed off is wrong. Let’s stop this proposal. God gave us this land for our use. Roadless areas should be utilized for recreation, timber harvest and replanting. Think science. Private business has been harmed by similar action. Targhee oil drilling should be allowed. Current forest area is greater now than 50 years ago. Balance needs to be maintained in lands of many uses. I read that environmentalists are against private property rights and other God given rights. (Individual, Idaho Falls, ID - #18243.10200)

#### **Public Concern: The Forest Service should consider allowing oil and gas development on a carefully controlled basis.**

Oil and gas development should be considered on a carefully controlled basis given the very minor footprint which it has been proven it can be controlled to. (Individual, East Alton, IL - #6649.10110)

#### **Public Concern: The Forest Service should limit the amount of methane wells allotted on a certain amount of acreage.**

Methane should have been looked into before so many wells were drilled.

Water is precious lets not disturb any more of it.

A limit of Methane wells should be allotted on a certain amount of acreage.

And the water from the wells should stay on the property of the well owners. Not flow down onto your neighbor’s property. (Individual, No Address - #15537.93540)

**Public Concern: Oil and gas development should not be allowed in the national forests.**

The policy should permanently and immediately halt all roadbuilding, all timber sales, and all other activities--such as off-road vehicle use, grazing, mining, and oil and gas development--that would degrade roadless areas. (Individual, Eugene, OR - #634.10100)

**Public Concern: A shortcoming of the Preferred Alternative is that it does not preclude oil and gas leasing, but does restrict road access for any new leases in roadless areas.**

While I am generally quite happy that such a proposal is moving forward--I do want to point out some shortcomings, especially with the preferred alternative. They are as follows: It does not preclude oil and gas leasing, but does restrict road access for any new leases in roadless areas. (Individual, Salt Lake City, UT - #10770.93540)

### 6.3.8 Alternative Resources and Energy Sources

Many people believe the Forest Service should promote the usage of alternative sources of energy such as wind and solar powered energy. Others feel alternative materials as substitutes for traditional wood products should be encouraged. "I would urge the Forest Service to use recycled paper for all of their reports--and look into the possibility of using hemp paper where appropriate," states one individual. Another individual encourages the Forest Service to print the Final EIS on 100% post-consumer recycled paper. Additionally, respondents emphasize the importance of using alternative building materials, such as, pumice, steel, brick, and wood laminate/foam mixes. Many individuals favor a pro industrial hemp policy.

Conversely, some respondents believe there will be adverse environmental impacts from the increased use of wood fiber alternatives. They fear that increased demand for cotton or hemp would cause more erosion, and more fertilizer, pesticide, and herbicide usage. One individual states, "Wood used for building materials could be replaced by steel, which would result in more steel mines. Yeah right!!! Plastic could also be used but that would result in the production of more chemicals. More toxic gasses would be released when these homes burned in forest fires too." Another individual counsels the Forest Service "to keep clearly in mind that forests are a super-resilient, totally renewable solar-grown natural resource and that wood is the most environmentally friendly building product known to man."

**Public Concern: The Forest Service should promote alternate sources of energy.**

You must keep our forests roadless, protect them from off-road vehicles, wasteful harvesting, and promote solar energy and wildlife and plant conservation. (Individual, New Hartford, NY - #2947.10110)

The gas oil, and electric companies are destroying our forests as fast as the rest of the companies...Instead of using our fossil fuels, the United States has to go to solar power and wind power. (Individual, Greenville, WI - #646.93540)

**Public Concern: The Forest Service should promote alternative materials as substitutes for traditional wood products.**

I would urge the Forest Service to use recycled paper for all of their reports--and look into the possibility of using hemp paper where appropriate. Stop using trees for paper. (Individual, Klamath Falls, OR - #1266.93341)

A 1% reduction in the wood products that we use is a small sacrifice to pay to protect the remnants of our last roadless areas. It could be accomplished by simply printing the final EIS on 100% post-consumer recycled paper. (Environmental/Preservation Organization, Roseburg, OR - #52494.93341)

I believe that we can do better in terms of wood usage by better management of commercial nurseries, as well as better and more comprehensive recycling measures. These may increase our costs of paper and wood but I feel that our forest wilderness is priceless. (Individual, Mill Valley, CA - #2164.93340)

We need to encourage more recycling and save our trees. We waste too much paper as napkins, paper towels and tissues. Cloth can be used and then washed. (Individual, Pocono Lake, PA - #3873.93341)

We must stop this madness! There are other resources we could be using if the government weren't suppressing it. (Individual, Port Huron, MI - #3062.93341)

Logging does not have to continue. There are too many resources available to use for paper and other products that come from trees. There is industrial hemp, henna, soy beans, and etc. etc. All of these plants grow quickly, but at the same time, we consume way too much and we need to cut back on our awful consumption and start to fundamentally change our consciousness to make the world work for all of us, not just for a few. It is up to all of us, but at this point, you, to make this fundamental change at the national level by ending all logging in all national forests and end logging throughout the world as well. This has existed for too long and it cannot continue on for any longer. It is time that we change our ways for the future of this planet, earth. (Individual, Knoxville, TN - #5560.93340)

**ALTERNATIVE BUILDING MATERIALS**

Please save the forests. Instead of timber, we can use pumice-crete to build housing. It is more eco-friendly. (Individual, Oak Park, IL - #3778.93341)

Enough is enough. Building is now using a great deal of steel in framing, so the need for wood is not in such demand. (Individual, San Francisco, CA - #25577.93341)

There is no reason that more brick can't be used in construction or that combinations of wood laminate and foam could not become a more common building material. (Individual, Ogden, UT - #445.93341)

**Public Concern: The Forest Service should adopt a pro industrial hemp policy.**

The Forest Service could help lessen the demand for wood by adopting a pro industrial hemp policy. (Individual, No Address - #405.23000)

It is my understanding that using hemp (which is not a drug but a textile, paper, clothing and fuel source), that grows in 100 days as much source fiber as a 50 to 500 year old tree. Also it takes no pesticides to grow hemp and some is very oxygenating as there have been shown links to ozone repair from abundance of oxygen.



Hemp is also completely mold, mildew and termite resistant, unlike wood. There are many uses for this crop and it can save forests. Please work to implement the use of hemp as a serious replacement for logging. (Individual, No Address - #1793.93341)

Why isn't hemp, which is easy to grow and does not require bleaching, used instead of ancient trees? It could save so much of our treasured forests, why not promote that and save what is left? (Individual, Boca Raton, FL - #3396.93340)

### **Public Concern: The Forest Service should consider the environmental impacts of increased use of alternatives to wood fiber.**

Cotton or hemp could be used for paper. The increased demand for these products would result in more acreage being tilled and exposed to erosion. More fertilizer, pesticides and herbicides would be required to produce these crops and we all know what that can do to our water resources. There would be an increased need for fossil fuels to power the equipment (global warming, acid rain). With the increased use of computers and the internet resulting in a high demand for hydro-electric power (more dams) or fossil fuels (global warming, acid rain). Wood used for building materials could be replaced by steel, which would result in more steel mines. Yeah right!!! Plastic could also be used but that would result in the production of more chemicals. More toxic gasses would be released when these homes burned in forest fires too. (Individual, No Address - #197.72400)

For the sake of countless rural families and communities in your country, I urge you to keep clearly in mind that forests are a super-resilient, totally renewable solar-grown natural resource and that wood is the most environmentally friendly building product known to man. (Individual, BC, Canada - #7647.93300)

## **6.3.9 Utility and Water Delivery System Permits and Infrastructure**

Public officials request the Forest Service develop a cumulative effects section to describe the effects of the proposed rule on public utility infrastructure. Other respondents are more specific, requesting a decision be issued by the Forest Service to reroute Collier Hollow Road #2780 so that utility installation can proceed.

Many respondents claim that the proposed rule should not interfere with the building, maintenance, or operation of water holding and delivery systems and electrical facilities. The Forest Service should allow access for the maintenance of water and utility infrastructure to protect public health and safety. One state elected official advises dam safety can affect “the safety of millions of people across the country who could be living, and working in the path of a potential dam failure.” Others request access to electrical facilities. They point out that “a loss of electricity can shut down necessary heating, cooling, food refrigeration, lights, and other functions, posing health and safety risks. Furthermore, if a utility cannot access its facilities, for example to remove a downed tree from a live electric wire, this can pose a fire or other danger to the local environment and even to adjacent property.” Additionally, several respondents point out that the Forest Service should allow access to stream gauges, climate stations, and snow survey data sites (SNOTEL).

Conversely, several writers believe the Forest Service should prohibit new human developments and water projects. Some citizens feel dams and any other “harmful activities” should be prohibited.

**Public Concern: The Forest Service must develop a cumulative effects section to describe the effects on public utility infrastructure.**

Page 3-141--There is no cumulative effects section for Real Estate Management. The reader is left with no sense of how special use holders, both with and without current "valid existing rights" will be affected over time by the "Proposed Action." The questions that must be addressed are: How will new applications and proposals for electronic sites, municipal water reservoirs, irrigation diversions, etc. be handled under the prohibitions? How will existing permits be handled? What effect will these have on local communities that rely on these uses for administration and providing services to the public?

Relief: The Forest Service must develop a Cumulative Effects section for this and address the questions presented. (County Elected Official, Worland, WY - #16185.90300)

**Public Concern: The Forest Service should issue a decision to reroute Collier Hollow Road #2780 so that utility installation can proceed.**

Would like USDA to finish their decision of Collier Hollow RD #2780 after four years delay. This project is holding up utilities from being installed. (Individual, Cola, FL - #1372.71130)

**Public Concern: The roadless area rule should not interfere with the building, maintenance, or operation of water holding and delivery systems.**

We need ACCESS TO WATER. Water developers must not be impacted by new regulations. We, whether private or public, must continue to have access to maintain, improve, operate, and develop water resources. Roads give us this access. (Individual, West Point, UT - #4008.90333)

An across-the-board ban on new or reconstructed roads in areas that are currently roadless in these basins could severely impact Denver Water's ability to implement an environmentally sound, comprehensive long-range plan to meet the future water demands of the population here. We are currently working with the U.S. Forest Service in Colorado to get the roadless areas on GIS so that the extent of these possible impacts can be determined. (Utility Group or Organization, Denver, CO - #43413.90333)

It is better to permit required maintenance activities to occur as needed, rather than to have to hurriedly build a road to deal with "an imminent threat of flood, fire, or other catastrophic event..." as anticipated in 294.12-b-1. (State Elected Official, Salt Lake City, UT - #43918.90333)

Roadless issues that have been raised are as follows:

\*Access to monitor, maintain and repair storage and conveyance facilities. NOTE: The projects held by the Board of Water Resources is a very small part of the total storage and/or conveyance facilities in the roadless area. The local water entities need to identify their own facilities and the "road" they presently use in these roadless areas to access their projects.

...\*Opportunity for future water development should be allowed. NOTE: Growth will continue and water development may be needed in many areas of the state. There will be cases where the most reasonable source of this needed supply is in these roadless areas. This opportunity should not be ruled out. (State Elected Official, Salt Lake City, UT - #43918.90333)

It appears that the Forest Service has also not completed a study of the water rights in the proposed roadless areas and the impact of closing roads on these water rights. Private Irrigation Companies and Individuals have previously been damaged by establishing improper wilderness boundary lines which include irrigation and culinary water sources inside the Mt. Nebo Wilderness areas. When considering closing roads, the Forest Service must be more cautious to allow motorized access for maintenance of such systems which is afforded by roads. Therefore, Juab County requests copies of maps, studies and other documentation detailing and

describing what studies or analysis has been performed on existing water rights, water systems and the related proposed road closures. (County Commissioner, No Address - #47983.90300)

There are still undeveloped springs that are needed by our local communities for culinary water that we need access to. We also need the ability to maintain and repair existing collection points and systems. (County Agency, Manti, UT - #43734.90332)

There are a number of water rights that have been issued that allow direct diversion, trans-basin diversion or storage within National Forest lands in Wyoming. If the facilities fall within a roadless area, the State Engineer's office staff and owner must still be allowed access to the facility for regulation, operation and maintenance. (State Elected Official, Cheyenne, WY - #2816.90333)

#### **ALLOW ACCESS FOR MAINTENANCE TO PROTECT PUBLIC HEALTH AND SAFETY**

The following is a quote from the May/June issue of the Association of State Dam Safety Officials newsletter. "There is an alarming lack of public support and education about the need for proper maintenance and repair. Dam safety is not a glamorous issue, unless a dam fails. But, it is one that affects the safety of millions of people across the country who could be living, and working in the path of a potential dam failure. If dams fail, people can die and property can be destroyed." If [the] proposed rule is not modified to allow this access, the Forest Service should be prepared to accept the financial liability from any resulting structural failures. Further, if the Forest Service allows these structures to deteriorate to the point where they become useless, the Service should compensate owners for the administrative taking of the water rights. (State Elected Official, Salt Lake City, UT - #43918.90333)

#### **Public Concern: The proposed rule should not interfere with the building, maintenance, or operation of electrical facilities.**

PROPOSED SECTION 294.14--SCOPE AND APPLICABILITY--IMPACT ON EXISTING SPECIAL USE AUTHORIZATIONS This section states that road construction or reconstruction associated with ongoing implementation of long-term special use authorizations would not be prohibited. However, the proposed wording in this section specifies existing ski areas as the example of such authorizations. SCE [Southern California Edison] wishes to clarify that other special uses are also subject to this authorization, and requests the inclusion of utility distribution and transmission facilities in the description of long-term special use authorizations. While sections 294.14 and 294.12(b)(3) and the preamble discussion provide some comfort that existing permitted uses and affiliated roads would remain authorized, the text and preamble are not as clear as they might be on these points, and so raise concerns. (Utility Group or Organization, Rosemead, CA - #29792.64353)

In the interest of avoiding any ambiguity, the USFS should explicitly refer to "hydroelectric generation facilities and surrounding project lands, energy transmission and delivery facilities, and other utility facilities, rights-of-way, and corridors" as types of current and future authorizations that remain intact under its road regulations. In addition, the USFS should recognize that permits or other authorizations may not completely reflect each road or access-way needed to construct, operate, repair, and maintain such facilities. If a road is needed to get to an authorized facility, then USFS rules need to accommodate such a road, even if it would be a new road in an unroaded area or if it is an existing road that has not yet been recognized as a "classified road." (Utility Group or Organization, No Address - #43417.90320)

The Proposed Rule on roadless area conservation may adversely effect AEP's statutory obligation to provide reliable electric service throughout its service territory, by precluding construction of new power lines and hampering AEP's ability to inspect and maintain existing power lines and communication facilities within certain national forest lands. The Proposed Rule would establish a federal regulatory prohibition on road construction and reconstruction in designated "unroaded portions of inventoried roadless areas." With limited exceptions, Forest Supervisors would have no authority to permit road construction or reconstruction in these

areas, even if such authorization would be consistent with applicable statutory criteria. In this manner, the Proposed Rule impermissibly limits the authority of the Forest Supervisors and other local decision makers, who are bound to make land use decisions based on applicable law. (Utility Group or Organization, No Address - #43981.90332)

Notwithstanding this statutory mandate, a number of national forests, particularly those east of the Mississippi River, to date have failed to identify appropriate corridors in forest plans. AEP believes it is in the interest of agencies with jurisdiction over federal lands to identify utility and transportation corridors in long-range strategic planning documents, including forest plans. Long-term planning is environmentally preferable because it encourages co-location of linear special uses, such as those for electric transmission lines, natural gas pipelines, and transportation projects, and minimizes the proliferation of separate rights-of-way. It is infeasible, however, to locate a linear special use without access roads being available to support construction, maintenance, and repair of the facilities installed within the right-of-way. Consequently, the nationwide prohibition in the Proposed Rule would effectively preclude the subsequent designation of utility corridors throughout potentially vast areas of currently unroaded forest lands, without consideration of all the statutory criteria in FLPMA. In many densely populated areas in the east, these unroaded areas may be the areas that best satisfy all the FLPMA statutory criteria for utility corridor designation.

...The Secretary of Agriculture, with respect to lands within the National Forest System...is authorized to grant, issue, or renew rights-of-way over, upon, under, or through such lands for...systems for generation, transmission, and distribution of electric energy...[and]...such other necessary transportation or other systems or facilities WHICH ARE IN THE PUBLIC INTEREST and which require rights-of-way over, upon, under, or through such lands. (Utility Group or Organization, No Address - #43981.90332)

The DEIS also fails to consider impacts to maintenance and repair of existing facilities in roadless areas. AEP performs vegetative maintenance on rights-of-way every 3 to 5 years, or as needed, to cut brush and danger trees. Likewise, structural and conductor maintenance is based on the results of aerial or climbing inspection. While helicopters can be used for some conductor (wire) maintenance procedures, their use is limited by terrain, right-of-way vegetation and width. Therefore most transmission line maintenance must be performed by a line crew accessing the site and climbing the tower. For the minimal amount of helicopter maintenance that can be performed, it can only be accomplished during ideal weather conditions in order to have proper stability and visibility to safely guide the aircraft. The reality is that when the transmission lines typically go out of service, it is generally during bad weather. In such instances, AEP must not be restricted to helicopter maintenance in roadless areas because timely service restoration time would be precluded with associated public health and safety implications.

...Finally, it is important to note that unstable slopes (landslides) and/or foundation problems cannot be remedied by means of a helicopter. A landslide that occurs after a line is constructed must be corrected by road access. (Utility Group or Organization, No Address - #43981.90332)

**BY INCLUDING UTILITY MAINTENANCE IN THE EXCEPTION FOR PUBLIC HEALTH AND SAFETY**

Section 294.12(b)(1) of the proposed rule would allow a road in an unroaded area if the responsible official determines that: "A road is needed to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property." The exception is too narrowly drawn. It should be expanded also to cover roads used for the operation, repair, and routine maintenance of electric and other utility infrastructure, because such roads are equally necessary for the protection of public health and safety. Furthermore, the issue before the responsible official should be the specific routing of the road and conditions to avoid or reduce its environmental effects, not whether such access roads will be permitted.

If an EEI member or other utility is unable to access existing electricity generation or delivery facilities for operation, repair, and maintenance, and as a result those facilities go out of service, the customers who rely on the electricity can be put in jeopardy. A loss of electricity can shut down necessary heating, cooling, food refrigeration, lights, and other functions, posing health and safety risks. Furthermore, if a utility cannot access its facilities, for example, to remove a downed tree from a live electric wire, this can pose a fire or other danger to the local environment and even to adjacent property. Therefore, EEI requests that the USFS expand the "public health and safety" exemption to accommodate roads needed for access to utility facilities, whether or

not such roads have already been built or recognized as “classified roads.” (Utility group or Organization, No Address - #43417.90000)

**Public Concern: The Forest Service should allow access to stream gauges, climate stations, and snow survey data sites (SNOTEL).**

Roadless issues that have been raised are as follows:

\*Access to stream gauges, climate stations and snow survey data sites is very critical.

...Stream gauges are funded 50 percent by the Division of Water Resources, the Division of Water Rights, or other Utah water entities. Almost all of this data, however, is collected by federal agencies. The data is critical to both state and federal agencies to administer the Bear River and Colorado River Compacts, plan for the proper storage and release from reservoirs for maximum dam safety and for the ongoing planning to manage and develop, when necessary, additional water resources. The SNOTEL and Snow Data Measuring sites are critical for Utah’s Cloud Seeding Program. (State Elected Official, Salt Lake City, UT - #43918.90333)

**Public Concern: The Forest Service should prohibit new human developments and water projects.**

...If roadless area characteristics associated with Wildlands Values (DEIS 3-161), many of which are recognized and valued by the American Public, are to be preserved, the following management guidelines must be adopted:

...New human developments and water projects prohibited. (Environmental/Preservation Organization, Albuquerque, NM - #43737.90240)

This new policy should provide permanent protection for ALL roadless areas from road construction and reconstruction, all logging, mining, grazing, oil and gas development, dams, off-road vehicle use and other harmful activities. (Environmental/Preservation Organization Albany, OR, - #6506.10100)

### 6.3.10 Ski Area Permits

Many people raise concerns about ski area expansion, and many comment on the effects of the proposed rule on specific current and proposed ski areas operated on National Forest System lands. Respondents ask the Forest Service to clarify the effects of the final rule on existing and future ski area operations. Several business/business associations ask that ski resort boundaries operated under a current master development plan be exempted from prohibitions in the final rule. Others suggest the Forest Service exempt ski areas with approved records of decision from the proposed rule.

One individual is concerned that that the proposed rule will effectively modify current Inyo National Forest special use permits in favor of the Mammoth Mountain Ski Area. Many others express either support or opposition to the Pelican Butte Ski Area proposal. Some feel that the planning process for the proposed Pelican Butte Ski area should continue unimpeded. Contrary to the conclusion in the Draft EIS, the Pelican Butte Ski Area would provide more dispersed recreation opportunities than an undeveloped Sky Lakes B roadless area, supporters assert. Supporters of Pelican Butte request exemption from the final rule for a wide variety of reasons, citing support for an exemption from members of congress, local businesses and residents; an ongoing planning process initiated by the Winema National

Forest; and the economic and recreational opportunities the ski area may provide to the region. Opponents of the ski areas request that the final rule kill the project because of decreasing skier and snowboarder numbers, the bad precedent that an exemption would set, and unacceptable environmental impacts. Likewise, respondents express either support or opposition to the expansion of the White Pass Ski Area into Hogback Basin.

Other respondents state the Forest Service should not allow any ski area construction or expansions. Many feel that there are already ample opportunities for the snowriding public on National Forest System lands and that current skier and snowboarder demand is flat. “I urge you to not increase area of existing ski areas, and do not start any new ones on USFS land,” writes one citizen. Many feel the final rule should not create special exemptions of any kind for new ski area construction or expansion of current areas. One recommendation is for the final rule to prohibit proposed ski areas and ski area expansions that did not have a record of decisions signed by October 13, 1999.

Finally, some helicopter skiing operation permit-holders request that the Final EIS explicitly state that helicopter skiing is a suitable dispersed recreational activity in designated roadless areas.

Other concerns addressing ski areas are found in Chapter 4 and in Appendix B.

### **Public Concern: The Forest Service should clarify the effects of the final rule on future ski area operations.**

We need additional time to determine the impact of the Proposed Rule on future ski area operations. There are conflicting descriptions of the effect of the Proposed Rule on ski areas. The Forest Service states that ski area operations could expand into inventoried roadless areas so long as it did not require the construction or reconstruction of roads. DEIS at 3-131. Elsewhere the DEIS states that ski area operations could not expand into inventoried roadless areas unless it is approved before the Proposed Rule is finalized. ID. at 3-172. Moreover, it is unclear exactly what type of activities associated with the expansion of a ski area fall within the prohibition on the construction or reconstruction of roads. (Business, Vail, CO - #13956.31300)

Comment: Page 3-12--The portion of this section that discusses expansion of ski areas, resorts, and other recreational developments only addresses those that are currently under permit or have an existing decision for expansion. It does not discuss what the decision is for newly proposed ski areas, resorts, or other recreational developments.

Relief: The Forest Service must disclose the disposition of new special use proposals as part of the “Proposed Action.” (Town or Municipality/Municipal Association, Cheyenne, WY - #15902.90330)

Resorts that obtain approval should be able to make improvements outside of permitted boundaries if no road construction is needed or if roads already exist in roaded portions of IRA’s. The proposed rule should be modified to clearly state that the policy pertains only to road construction/reconstruction and that ski area expansion outside of permit boundaries into IRA’s could be authorized if there is no road construction needed. (Business/Business Association, Mammoth Lakes, CA - #44001.90330)

The Forest Service has stated that the prohibition in [section] 294.12(a) would not prohibit new ski area development in unroaded portions of inventoried roadless areas so long as it does not require the construction or reconstruction of roads. DEIS at 3-130 to 3-131. As discussed above, this is consistent with the understanding of the Vail Resorts because potential expansion of ski operations at our existing ski areas would not involve road construction or reconstruction and therefore would not be subject to the prohibitions of the Proposed Rule.

However, there is some ambiguity because the DEIS elsewhere states that “expansion beyond existing boundaries, and new ski developments are not likely to be allowed under the prohibitions unless a decision to approve them is made prior to rule implementation.” DEIS at 3-172. This latter language should be stricken because it is contrary to the Forest Service’s statements that the proposed [section] 294.12(a) will not prohibit the construction, clearing of timber for, and use of ski runs, ski trails, and ski ways in present or future special use permit areas that does not involve the construction or reconstruction of roads. (Business/Business Association, Vail, CO - #29747.90331)

A comment that is put forth in the DEIS is that “activities and constructed features of ski area development and management are primarily consistent with Rural and Urban ROS classes.” The document goes on to discuss the “sharp contrast,” the “inconsistency with management of IRAs,” and the controversy associated with further expansion, thus “FS lands will no longer be a reservoir for future ski areas.” Most ski areas have been in place for 40 or more years and the vast majority of them operate on National Forest lands. The areas existed before the Wilderness Act, before the RARE II process, before the requirement for Forest Plans, and yet it is ironic that it is the ski area that no longer fits in its allocated setting.

In many parts of the west, it has been the FS that has created many of the ski area related communities as a result of the initial permit authorization and then subsequent land exchanges. It is unacceptable for the FS to be instrumental in the development of planning and establishment of the industry, and now to all of a sudden change management strategies so significantly. Creating higher densities at existing developed sites will be disastrous from a planning and safety perspective. The Forest Plans identified these concerns and that planning outcome needs to be incorporated into the final version of this proposal. (Business/Business Association, Mammoth Lakes, CA - #44001.90331)

### **Public Concern: Ski resort boundaries operated under a current master development plan should be exempted from prohibitions in the final rule.**

Developed recreation sites play a critical role in the multiple use strategy of the forests. Each year millions of visitors ski and snowboard at resorts on national forest land. It is our belief that many of these visitors would not take advantage of these opportunities if it were not for the convenience afforded by the resorts. Ski resort operators know that their livelihood depends on protecting and enhancing the environment permitted them through the Special Use Permit process. All resorts on federal land work closely with their local Forest Service staff in order to treat the land with respect for not only our generation but the generations to come as well. BECAUSE OF THIS, WE REQUEST LANGUAGE BE INCLUDED IN THE FINAL DRAFT OF THE ROADLESS DOCUMENT WHICH WOULD STIPULATE THAT ‘ALL NATIONAL FOREST LAND THAT IS CURRENTLY OPERATED UNDER A SPECIAL USE PERMIT OR A MASTER DEVELOPMENT PLAN BE EXEMPTED FROM ROADLESS CONSIDERATION.’ (Business, Lake Tahoe, CA - #2113.90331)

FIRST, the Forest Service could add a provision to [section] 294.12 that states:

The prohibition in paragraph (a) of this section does not apply within existing or future special use permit boundaries of existing ski areas. This language is intended to exempt authorized existing and future special use permit boundaries of existing ski areas from the prohibition on the construction or reconstruction of roads in [section] 294.12(a) of the Proposed Rule. (Business/Business Association, Vail, CO - #29747.90331)

### **Public Concern: The Forest Service should exempt ski areas with approved records of decision from the proposed rule.**

I am writing in SUPPORT of the Draft Roadless Initiative; specifically relief for ski areas with approved Records of Decision. Our love of the outdoors and our ability to enjoy an improved ski area at White Pass will be effected by the regulatory relief sought for all 800 acres of Hogback Basin. This is a small potential ski development area found not to have outstanding wilderness attributes, but it does deserve to be opened up for use and enjoyment by families such as ours. (Individual, No Address - #16911.90331)

**Public Concern: The Forest Service should address the fact that the proposed rule will effectively modify current Inyo National Forest special use permits in favor of the Mammoth Mountain Ski Area.**

Current Special User Permits (SUP) in effect for MMSA [Mammoth Mountain Ski Area] within the INF [Inyo National Forest] include Mammoth Mountain Ski Area, June Mountain Ski Area, Tamarack Resort and Cross-Country Skiing Center, and Mammoth Snowmobile Adventures. As with the INF Forest Plan... the impact of the Decision will have the effect of modifying or amending all of the SUPs in favor of MMSA. (Individual, Mammoth Lakes, #13994.90331)

**Public Concern: The Forest Service should allow the proposed Pelican Butte Ski area to continue to be studied.**

From what I am hearing in the media and reading in the news, the proposed Pelican Butte ski area is dead on arrival, a result of the proposed 43 million acre roadless plan. If this is true, it is an absolute outrage. At this stage we are not debating whether the project should be built but rather will the study be allowed to continue. Pelican Butte has been left out of all other proposed lockups, so why now? Jeld-Wen has already invested millions of dollars and tens of thousands of man hours in good faith that the proposal would be decided on its merit instead of a technicality. This project has had local support for over 30 years and the comment period last year enjoyed 70% "in favor of" nationwide. Jeld-Wen has said from the beginning they would do everything possible to make this project environmentally friendly. If road building is the only problem from letting the study continue, it is my understanding more old roads will be closed than new ones built. Public access to our forests is already being shut down at an alarming rate. All that is being asked is that the proposed ski area be allowed to continue to be studied since it is already in progress. The public is being told that recreation will replace logging on our national forests. The fact that the USFS is asking for public comment on the 43 million acres roadless plan leads one to believe the plan can still be fine tuned and altered. In this case, the adjustment will amount to 0.000001 percent of the 43 million acres. In light of the history and facts surrounding the Pelican Butte proposal, it is hard to believe that those in the USFS making the decisions have become so morally and ethically bankrupt as to allow the study to be trashed due to a technicality. (Individual, Klamath Falls, OR - #3540.64351)

Members of Congress have specifically called for an exemption for the Pelican Butte project. Senators Gordon Smith of Oregon and Frank Murkoski of Alaska have written to Secretary Glickman requesting an exemption...as has Representative Greg Walden of Oregon...Local civic leaders and elected officials have been outspoken in support of an exemption for Pelican Butte, as reflected in an article from the Klamath Falls Herald and News...Numerous officials in southern and central Oregon also have joined together in a letter to Secretary Glickman, urging that the site-specific review process for Pelican Butte be allowed to proceed to a Record of Decision. (Business, Klamath Falls, OR - #16103.64353)

The idea of having a ski area in the area of Klamath Falls, Oregon has been an expectation of the citizens of this area for a long period of time, over 30 years. The serious work on this effort has been ongoing for over three years, with a final decision on approval now expected at the beginning of next year. The current, and most recent, Pelican Butte proposal originated with a prospectus issued by the Forest Service in 1995, which solicited potential developers for a ski area on Pelican Butte. Pelican Butte Corporation, a wholly owned subsidiary of The JELD-WEN Corporation, responded and was awarded the opportunity to write an Environmental Impact Statement to study the potential for development of a facility on the winter recreation site identified in the Winema National Forest Plan. With the Northwest Forest Plan in place, any proposals for development in the Winema National Forest have had to undergo the rigors and scrutiny of the most thorough environmental studies. For the better part of four years now and at an expenditure of some \$3.75 million the PBC has followed all of the process required in an EIS to meet the requirements of the Northwest Forest Plan and have gone through perhaps the most extensive EIS process for a ski facility in the nation's history. (Individual, Washington, DC - #10020.64353)



It (Pelican Butte Ski) has always been a part of the regional economic development industrial diversification plan of a devastated timber dependent community. It needs resolution. (Tribal, Chiloquin, OR - #10116.93700)

As Chairman of the Klamath Tribes, an organization within Klamath County that has a major concern with establishing and maintaining a diversified and viable economic base within the Klamath Basin, I have been asked to comment upon the impact of the President's Roadless Plan (64 Federal Register 56306, October 19, 1999), particularly as it may impact the Pelican Butte Ski project under consideration in the Winema National Forest....Without being able at this time, due in large part to the unavailability of the final EIS and other economic data, to address whether the Tribes will ultimately support or not support the project based upon its environmental, Tribal cultural and economic impacts, we strongly feel that, given the potential impacts to the entire community, this project should be provided a "grandfather" clause exemption to complete its EIS process and presentation to the Basin community for their consideration. (Tribal, Chiloquin, OR - #10116.64353)

**Public Concern: Contrary to the conclusion in the Draft EIS, the Pelican Butte Ski Area would provide more dispersed recreation opportunities than an undeveloped Sky Lakes B roadless area.**

The agency necessarily must conduct local evaluations for each roadless area and national forest. To demonstrate the errant agency assessment contained in the DEIS, we provide the following example from the Sky Lakes B Roadless Area in the Winema National Forest, Oregon, where the proposed Pelican Butte Ski Area (EIS completed) would be prohibited by DEIS. Because of insufficient time available during this abrupt public comment period, and because adequate data is not available from the Forest Service for all roadless areas, we are only able to provide this small demonstration of the wholesale error in the agency's superficial nationwide assessment. If there were more time to complete additional assessments, we would no doubt find that the DEIS failed to adequately evaluate the consequences of the proposed prohibition on most other roadless areas across the nation. SKY LAKES B ROADLESS AREA, WINEMA NATIONAL FOREST, OREGON. Evaluation Criteria (Selected from Table S-4. Summary of Combined Effects of the Proposed Action): DISPERSED RECREATION DEIS says "...dispersed recreation would be maintained to meet increasing demands," although dispersed recreation using roads--in greatest demand from national forests--would be effectively prohibited outright. Recreation use of this roadless area has not increased significantly, nor is it projected to do so without the ski area proposal. Winema Forest Plan/Pelican Butte EIS would provide thousands of additional dispersed recreation user days associated with this proposed regional recreation destination (all additional recreation user days forgone by DEIS). (Timber Company or Association, Eugene, OR - #15879.7000)

**Public Concern: The Forest Service should consider whether to exempt the Pelican Butte Ski Area proposal from the final rule.**

**EXEMPT PELICAN BUTTE**

The Pelican Butte ski area can be a low impact project with permanent economic and social benefits for the entire region. (Individual, Klamath Falls, OR - #11414.90331)

We would sure like to be able to take our children to the local Pelican Butte ski area in future years. (Individual, Klamath Falls, OR - #11414.92300)

As a local business owner, I look forward to the favorable financial impact of Pelican Butte, but I must also express my support as a resident of the Klamath Basin. The climate is one of the things that first drew me to this area. It's one of the rare areas where we enjoy the four equal seasons to their fullest. I look forward to each season and the recreations that accompany them. Fishing in the spring; water sports on the Klamath Lake in the summer; hiking through the forests in the fall; and in winter, when the snow falls...shoveling!?! But, once I get out of my driveway, I would really enjoy a local winter recreation area where I could go with family and friends. Pelican Ski Park would help strengthen our community economically, assist in keeping our families

from moving away, and provide non-disruptive family entertainment. It may even reduce our juvenile crime rate by providing athletic development and recreational sports. I have always believed that the best way to build a successful community is by building it up from within and Pelican Butte ski/winter recreation area is a step in the right direction. (Individual, Klamath Falls, OR - #10829.64353)

Being Oregon property owners and tax payers we want to express our concern and go on record as being AGAINST the President's designation of Pelican Butte into a roadless area. Even if the Pelican Butte Ski Resort was never to become a reality we feel the public should be able to enjoy the Pelican Butte Area. I am a local CPA in the Klamath Basin and have been in favor of the proposed Pelican Butte ski/winter recreation area for sometime now. In recent years, with the reduction of logging, I have seen the local economy struggle, and have watched many businesses close their doors. It has been a challenge for our community to find new ways to use our local resources to build our lagging economy. Pelican Butte has been cited for many years as a possible winter recreation area. Extensive research and planning has been done to make it a low impact project, but with significant economic and social benefits to our area. I have seen the plans for the ski area and have been very impressed with the efforts to preserve the wild and natural beauty that represents the forests of Southern Oregon. I also believe that the proposed plan actually reduces the existing roads in the Pelican Butte area. (Individual, Klamath Falls, OR - #13673.64353)

#### **DO NOT EXEMPT PELICAN BUTTE**

I have been part of the GIS support team for the Pelican Butte project [on the Winema National Forest]. In spite of the fact that this roadless policy would axe the proposed ski development, I am heartened by the roadless designation. It is so much easier to build roads than to reverse the process and return developed lands back into wilderness. Please endorse this policy as soon as possible! (Individual, Corvallis, OR - #4653.90331)

I think we should leave Pelican Butte just the way it is. Beautiful. Then future generations can enjoy it as much as we have. (Individual, Klamath Falls, OR - #11625.92300)

The ski resort is not needed in this area. As of right now this mountain can be used by everyone including skiers. But if it is built it will only be a ski area, and along with a large wildlife population in this area are a lot of residents that oppose this resort. The wildlife, especially elk, will flourish in an area like Pelican Butte that has very limited roads. I am a skier but do not see a need for a ski resort when there are many within 1 to 2 hours from Klamath Falls. (Individual, Klamath Falls, OR - #6547.64353)

Despite a booming economy, the ski industry suffered its second straight decline this year and experts say even the popularity of snowboarding has dropped. The three major regions all showed drops. The Pacific West was down 4.3 percent, the Northeast 0.6 percent, and Colorado suffered a similar drop during the 1998-99 season, and has lost about 1.1 million skier days in two years [quoted in Oregon Newspaper]. Another excellent reason not to cater to developers at Pelican Butte! (Individual, No address - #9436.64353)

Please do not even consider special interest exemptions such as proposed by Jeld-Wen Inc. and possibly the Winema NF staff over the proposed Pelican Butte Ski Area. This proposed ski area is already an environmental disaster waiting to happen, with impacts in roadless areas, impacts to T&E species (area is adjacent to bald eagle winter habitat, is in spotted owl habitat etc.), to air quality and visibility in the adjacent Crater Lake National Park, impacts to the Upper Klamath Lake water quality, which is already an impaired body of water that does not meet standards and is home to endangered species. Some of the land within the proposed Pelican Butte Ski Area has already been set aside as mitigation to offset impacts from other forest activities. Now the Winema NF wants to mitigate the impacts to land that was already a mitigation for impacts to other lands. This has got to stop, especially for a ski area that is not needed. (Individual, Bend, OR - #9905.64353)

I am also totally opposed to an exemption for Pelican Butte for development by Jeld-Wen as a private ski area. It would be a travesty to grant an exemption for this pristine area, which is the largest remaining roadless area in the Winema National Forest, for the benefit of a few skiers and money-grubbing people. Having lived in Klamath Falls for some 28 years now, I have seen the devious attempt by a very small group of people who seek to develop Pelican Butte into a ski development. It would be truly tragic and unprecedented for the Forest

Service to even consider an exemption from the roadless area policy for Pelican Butte. (Individual, Klamath Falls, OR - #14726.64353)

**Public Concern: The Forest Service should consider whether to exempt Hogback Basin to allow the expansion of the White Pass Ski Area.**

**EXEMPT HOGBACK BASIN**

I am writing in favor of the plans to expand White Pass into 800 acres of Hogback Basin. I am both a downhill skier and a backcountry skier, and I do not believe that the expansion of White Pass will have a significant impact on environmental qualities of the area. It will provide significant improvement in the safety and quality of the outdoor experience to those members of the public who use the National Forest at White Pass Ski Area for downhill skiing. (Individual, Burbank, WA - #15596.91000)

The purpose of this letter is to voice my support for the draft Roadless Initiative, SPECIFICALLY, the regulatory relief for ski areas with approved Records of Decision. I support complete regulatory relief for all 800 acres of Hogback Basin due to its site-specific removal from Wilderness by the 1984 Washington Wilderness Bill. Please allow the White Pass ski area to expand into the requested 800 acres now under consideration. (Individual, Olympia, WA - #18221.64353)

**DO NOT EXEMPT HOGBACK BASIN**

White Pass Ski Area (WPSA) in the Washington Cascades is attempting to obtain regulatory relief via the Draft Roadless Initiative, so they can expand into an existing wilderness area. I OBJECT to the expansion of WPSA for the following reasons: The Hogback area, where WPSA wants to expand into, is in an existing wilderness area and [is] already one of the best and most accessible areas for backcountry skiing in the Cascades. Developing this area for alpine skiers will displace backcountry skiers into more dangerous (i.e. avalanche-prone) terrain. I enjoy alpine skiing and back country skiing. THE HOGBACK IS MUCH MORE VALUABLE FOR BACKCOUNTRY SKIING THAN IT IS [FOR] ALPINE SKIING. (Individual, Richland, OR - #18217.64353)

**Public Concern: The final rule should not create any special exemptions of any kind for new ski area construction or expansion of current areas.**

I support the proposed prohibition on road building, including those in proposed ski area developments. Numerous proposals to expand or build downhill ski areas are threatening roadless areas, including Pelican Butte and Mount Ashland in Oregon, Copper and Beaver Creek in Colorado, and Sherwin and Mammoth/June in California. Ski area developments degrade water quality, disturb sensitive sub-alpine plant communities, sever important wildlife migration corridors, and destroy natural quiet and solitude. In addition, ski areas are increasingly being built or expanded primarily to attract real estate investments, rather than to meet recreational demand. The final policy must not create any special exemptions of any kind for new ski area construction or expansion. (Individual, Davis, CA - #9458.90331)

According to the USFS, 55% of inventoried roadless areas provide water to downstream facilities that treat public drinking water. We note that the development and expansion of new ski areas, an activity that would be permissible under the preferred alternative (p. 3-18), is a major contributor to aquatic ecosystem degradation, particularly from increased sedimentation. THEREFORE, WE REQUEST THAT NO NEW SKI AREAS BE DEVELOPED OR EXPANDED INTO EXISTING ROADLESS AREAS AND THAT THE FEIS BE MODIFIED TO STRENGTHEN ROADLESS AREAS PROTECTIONS ACCORDINGLY. Some examples of potential impacts of ski developments on watershed values include the Mt. Ashland ski expansion, which threatens the McDonald Peak roadless area (a key area for protecting the drinking water supply for the city of Ashland, Oregon), and the Pelican Butte proposed ski development on the Winema National Forest in Oregon, which threatens aquatic ecosystem values tied to the Klamath Lake refuge. Both of these developments

threaten terrestrial and aquatic ecosystems and are inconsistent with Chief Dombeck's emphasis on watershed protection. (Environmental/Preservation Organization, Ashland, OR - #13522.64353)

As a skier, life long, I urge you to not increase area of existing ski areas, & do not start any new ones on USFS land. There is plenty of land available in existing ski areas for the hundreds of skiers. (Individual, Boulder, CO - #13644.90331)

This moratorium needs to include not only areas designated as "roadless" areas but should also include all new road building on public lands, inventoried or not including Special Use Permit Areas such as ski area developments. (Environmental/Preservation Organization, Seattle, WA - #958.64350)

Downhill skiing is also "flat" as an industry, and has been so for the last two decades. SEE National Ski Areas Association website: [HTTP://WWW.NSAA.ORG/MEMBERUPDATE/ESTSKIERSVISITS.HTM](http://WWW.NSAA.ORG/MEMBERUPDATE/ESTSKIERSVISITS.HTM). Ski areas are increasingly being built or expanded primarily to attract real estate investments, rather than to meet recreational demand...Rather than further expanding or developing into roadless areas, the ski industry should focus its resources on retrofitting and modernizing existing ski areas, expanding use with their permitted capacities during mid-week and shoulder seasons, and educating visitors about the wealth and tremendous diversity of other recreational opportunities available to them in mountain environments in both summer and winter seasons. Development currently occurring in Mammoth Lakes and June Lake is a case in point. The real estate sales of Intrawest, a partner in the Mammoth-June Ski Areas, have been booming without any additional ski area development. (Environmental/Preservation Organization, Lee Vining, CA - #15878.91300)

Ski area expansion in Colorado has become a real estate game. We should not sacrifice wildlife habitat and corridors so rich people can have slopeside condos and mansions. The working class people are being run out of the area. There are not enough people to fill existing jobs. The economy may suffer more from overbuilding and loss of pristine forest than from slowing rampant growth. People need places to escape, not move from one city to the next. (Individual, Silverthorne, CO - #13088.90100)

**Public Concern: The Forest Service should assure that prohibitions in the final rule cover proposed ski areas that did not have a record of decision signed by October 13, 1999.**

We are pleased that the proposed prohibition on road building includes a prohibition on new ski area developments in roadless areas. Numerous proposals to expand or build downhill ski areas are threatening roadless areas, including Pelican Butte and Mount Ashland in Oregon, Copper and Beaver Creek in Colorado, and Sherwin and Mammoth/June in California. Ski area developments degrade water quality, disturb sensitive sub alpine plan communities, sever important wildlife migration corridors, and destroy natural quiet and solitude. It's not just the roads that are bad. Ski areas almost invariably involve the establishment and maintenance of permanent clearcuts, often along draws and riparian areas. All pending ski area EISs without signed ROD prior to October 13, 1999 should be stopped in light of this roadless DEIS. Don't let private for-profit interest override the overwhelming public interest in protection of roadless areas. (Environmental/Preservation Organization, Eugene, OR - #55101.64353)

**Public Concern: The Final EIS should explicitly state that helicopter skiing is a suitable dispersed recreational activity in designated roadless areas.**

Nowhere in the plan is helicopter skiing listed as one of the anticipated dispersed recreation activities on roadless areas. There are numerous permitted helicopter ski operations on Forest Service lands in the western states and Alaska. Specific mention should be made of this use of roadless lands, since this is the type of dispersed recreational activity anticipated as suitable for these lands. (Business, Girdwood, AK - #52944.91700)

From discussions with the office of the Regional Forester it is our understanding that helicopter skiing is an approved activity within roadless areas. Helicopters are the least physically intrusive methods for providing commercial and recreational activities within forest lands, since roads are unnecessary. It is our belief that roads and new road construction attracts more invasive forms of commercial and recreational activities and therefore we would like to support Forest Service efforts to inventory and protect roadless areas in the Wasatch-Cache and Uinta National Forests. (Business, Snowbird, UT - #17600.91720)

**Public Concern: The final rule should not alter snowcat skiing special use permits without due process.**

My fears are legitimate that this Roadless Rule, if approved, is the first step in denying access to our winter sports special use permit without due process, or consideration for the thousands of recreationists who use our winter sports services. (Business/Business Association, Diamond Lake, OR - #8499.90331)

## 6.4 Wildlife-Dependent Activities

Many outdoors enthusiasts express concern for the impacts of the proposed rule on hunting and fishing opportunities on national forests generally and in roadless areas in particular. Many hunters feel that lack of roads will reduce the ease and success of their hunting activities, while a similar number believe the opposite is true. Many fear that the proposed rule will result in restrictions on hunting, and therefore believe the Forest Service should consider the effects of crowding on hunters if access to and acreage of public land is restricted. "Closing more public land will increase hunting accidents and more and more people are crowded into less and less land. Public safety demands that public lands continue to be open to everyone," one respondent writes.

Many question the adequacy and accuracy of the effects analysis in the Draft EIS, and request a more in depth analysis by the agency. Some request the Forest Service provide a quantified analysis of the effects of the proposed rule on hunting and fishing. One respondent suggests the Forest Service clarify how this proposal will affect access for hunting and dog training purposes on lands acquired in the future. County elected officials ask that the second paragraph on page 3-176 be deleted. They state, "This paragraph is immaterial to the discussion on hunting and fishing. What do cavity nesting birds and mammals, T&E species, and carnivorous species have to do with hunting and fishing?"

Some individuals write that hunting and fishing should be prohibited in roadless areas. Others recommend the Forest Service address "road hunting" and its impacts on wildlife and the environment. One respondent writes, "I don't believe that there is a need for them [road hunters] to be able to drive up next to a herd, shoot their deer or elk, drive out to the carcass, throw it in a truck, and drive home."

Several citizens advocate road building and access to aid hunting activities. Others feel the Forest Service should prohibit road building and stewardship logging in roadless areas in order to provide an abundance of wildlife to hunters and sightseers. "My family is a hunting family, and we firmly believe that the increase of roads in our national forests hurts the hunting community by increasing the amount of poaching that occurs, as well as leading to

the game animals leaving the area because of increased traffic,” writes one individual. Some specifically request adoption of Alternative 4 on the grounds that it will benefit hunting. Others question this assumption, however, and request that the Forest Service provide documentation as to whether research supports the claim that better quality hunting and fishing is found in roadless areas. One recreational organization requests that walk-in turkey hunting areas be excluded from roadless area consideration. Finally, state wildlife agencies assert that the proposed rule should allow them to perform their responsibilities. Assurances should be made by the Forest Service that “state wildlife agencies’ ability to manage fish and wildlife populations will not be restricted by this proposal,” states one such agency.

### **Public Concern: The Forest Service should address the impacts of the proposed rule on hunting.**

#### **THE PROPOSED RULE WILL NEGATIVELY AFFECT HUNTING**

On a big share of the Targhee NF you can no longer legally, drive off the designated route road to retrieve a big game animal, and the spur roads are tank trapped so effectively that you can not drag a big game animal out with a horse. (Individual, Ashton, ID - #8682.91400)

Proactive management that would be prohibited or severely restricted under the alternatives other than (No Action) can have very positive affects on hunting and fishing depending on the species involved. Elk for example need open areas dispersed with dense cover. They thrive in the seral stages of vegetation that follow fire or logging. Alternatives should focus on the best way to manage these lands and their resources not how to prohibit uses by the American people (Individual, Spokane, WA - #18168.83500)

#### **THE PROPOSED RULE WILL POSITIVELY AFFECT HUNTING**

I like to hunt on foot, and roadless areas have the best hunting. Please implement this initiative. (Individual, Great Falls, MT - #6428.91400)

My family is a hunting family, and we firmly believe that the increase of roads in our national forests hurts the hunting community by increasing the amount of poaching that occurs, as well as leading to the game animals leaving the area because of increased traffic. (Individual, Spanish Fork, UT - #799.83500)

Our public lands are riddled with roads and trails that provide human access to the point that wild game is being patterned to migrate to private lands during the hunting season. (Individual, Billings, MT - #940.83500)

### **Public Concern: The Forest Service should consider the impacts of crowding hunters when access to public land is restricted.**

Closing more public land will increase hunting accidents and more and more people are crowded into less and less land. Public Safety demands that public lands continue to be open to everyone. (Individual, Bigfork, MT - #10834.91500)

Also, in our particular area in the state of northern Wisconsin the bear hunters have been forced to come up en masse to hunt there because other areas have been more restrictive. (Individual, Herbstraw, WI - #22357.91400)

**Public Concern: The Forest Service should provide a quantitative analysis of the effects of the proposed rule on hunting and fishing use.**

To present a meaningful discussion of effects on hunting and fishing, some quantifiable predictions of increases or decreases in hunting and fishing recreation user days must be provided. Current use figures are presented in the Affected Environment section (page 3-173). To simply conclude that the “Action Alternatives” are going to somehow benefit hunting and fishing is far from a true disclosure of effects. States are charged with regulations associated with hunting and fishing and this should have been considered in a Cumulative Effects section, which is missing. The conclusion drawn (Page 3-176, third paragraph) that the “No Action” alternative would result in declines in game populations, decreases in encounter rates for hunters, and then to a reduction in hunting quality is simply mind boggling. Considering the fact that big game populations are at near or record highs over much of the West, a reasonable person would seriously question this conclusion. Where is the data or research to support such a broad sweeping conclusion?

Relief: The Forest Service must address these assumptions in an objective manner. Conclusions and assumptions such as these can result in modifications of hunter use and further economic impacts to communities. Harvest figures from National Forest System Lands for both hunting and fishing are lacking. These figures are published annually by State Fish and Wildlife Departments and would be very easy to compile and extremely helpful to the reader. (County Elected Officials, Worland, WY - #16185.91400)

**Public Concern: Clarify how this proposal will affect hunting access to lands acquired in the future.**

Please tell me specifically how this would impact hunting in the Cleveland National Forest in California, including hunting birds with dogs, or training for dogs? Specifically what would be the impact of access for areas that are acquired in the future, for access for hunting and dog training. (Individual, No Address - #1541.91400)

**Public Concern: The Forest Service should delete the non-game species discussion on page 3-176 from the hunting and fishing section of the Final EIS.**

Page 3-176, second paragraph--This paragraph is immaterial to the discussion on hunting and fishing. What do cavity nesting birds and mammals, T&E species, and carnivorous species have to do with hunting and fishing? Relief: The Forest Service must delete this discussion as it is not germane to the topic. Furthermore, it may lead individuals and groups to an inaccurate conclusion that these are huntable species. (County Elected Officials, Worland, WY - #16185.91400)

**Public Concern: Hunting and fishing should be prohibited in roadless areas.**

I would like to see stronger controls of these areas: 1. Ban motorized off road vehicles. 2. Eliminate grazing on federal lands. 3. Hunting and fishing should be prohibited. 4. Eliminate all logging practices. The above should apply to ALL federal lands and park areas. (Individual, No Address - #221.64150)

Ban all hunting and fishing in the wilderness areas. There should be some places where the animals can be left completely alone. (Individual, Flagstaff, AZ - #16524.91400)

### **Public Concern: The Forest Service should address “road hunting” and its impacts on wildlife and the environment.**

One aspect of the pros and cons which I feel has received little attention is the flagrant and illegal use of back country roads in our National Forests by “road hunters.” These people drive the many small forest roads, often abandoned logging access roads, with loaded guns. In addition to driving the roads, they often use the roads as access for driving off-road through all sorts of terrain—a starting cause of much erosion. I am 80 years old and have often, while hiking, met up with these “sportsmen.” They also frequently break down road gates erected by government agencies or private companies to help control erosion or stop harassment of animals. (Individual, Missoula, MT - #8910.91610)

I don’t hunt, but I do respect my friends and neighbors who do—I think this activity means a lot to them. However, I don’t believe that there is a need for them to be able to drive up next to a herd, shoot their deer or elk, drive out to the carcass, throw it in a truck, and drive home. The person who sold to me the used truck I own now, said he did just that with his truck—driving in on dirt roads, driving over meadows or into the woods to his game, and driving back to the dirt roads. That seems to take the sport out of hunting. (Individual, Laramie, WY - #12973.91400)

### **Public Concern: The Forest Service should allow road building and access to aid hunting activities.**

I am an avid deer hunter, and one of my necessities is a four-wheeler. I believe that roads should be built for four-wheeler use, as long as the hunters tread lightly on the terrain. Most hunters are very responsible drivers and they are very careful not to damage the land with the four-wheelers. Please continue to allow roads to be built on the reserve areas. (Individual, Rochelle, GA - #6994.91712)

I’ve seen what the closing of roads has done to prohibit the average hunter’s chances of success in the Medicine Lake area. Many of these roads were supposed to be for special (creative hunts) hunts, however I see very few hunters on foot using these set asides. (Individual, Redding, CA - #11631.91400)

### **Public Concern: The Forest Service should prohibit road building and stewardship logging in roadless areas in order to provide an abundance of wildlife to hunters and sightseers.**

For hunters to enjoy a good (long) season, there must be an abundance of wildlife. The same is true for people like myself who simply enjoy seeing wildlife during backcountry outings. This abundance can only occur when animals have a secure refuge away from the heavier hunting pressure and activity in the roaded areas. Roadless areas serve as incubators for wildlife. Animals breed and raise young in these roadless areas that later filter out into nearby roaded areas where they can be viewed or hunted. With more private land being closed to hunting, it is important that wildlife herds on public land be kept large and thriving. The way to do this is to protect these core areas of habitat by prohibiting road building and limiting timber harvest to that required for good stewardship. (Individual, Great Falls, MT - #6815.83500)

A recent survey by the Theodore Roosevelt Conservation Alliance found that 86 percent of anglers and 83 percent of hunters supported efforts to keep remaining roadless areas in National Forests free of roads. Fish and Wildlife personnel in the natural resource field have long recognized one of the best ways to maintain a quality hunting and fishing area was to have areas closed to motorized use. Something will be missing from our heritage if we continue the destruction of our last wild areas. As Aldo Leopold said, “There are some who can live without wild things and some who cannot.” Save our roadless areas. (Individual, Brainerd, MN - #18882.80000)



#### SELECT ALTERNATIVE 4

Alternative 4 is also of the greatest benefit to hunting and fishing opportunities by protecting habitat for some game species, particularly those that are sensitive to human disturbance or those requiring large home ranges. (Environmental/Preservation Organization, Seattle, WA - #10788.91400)

#### **Public Concern: The Forest Service should address whether research supports the claim that better quality hunting and fishing is found in roadless areas.**

The Forest Service should address the claimed potential benefits for the proposed rule by answering the following questions:

Does research support the claim that better quality hunting and fishing is found in roadless areas? (Individual, Kingsport, TN - #8500.91400)

#### **Public Concern: The final rule should not interfere with current dispersed recreation outputs or the ability to continue controlled burns within walk-in turkey hunting areas.**

Three to four thousand acre walk-in turkey hunting areas are intensively managed on Ozark and Ouachita National Forests through utilizing controlled burns. This walk-in program has been successful and should continue. Although portions of some turkey walk-in areas have acreage size and character to qualify as roadless, we recommend the Final Rule not interfere with current dispersed recreation outputs or the ability to continue controlled burns within walk-in turkey areas. (Recreational Organization, Dardandelle, AR - #19474.91400)

#### **Public Concern: The proposed rule should allow for state wildlife agencies to perform their responsibilities.**

The proposed rule on roadless areas will have a major impact on the management of wildlife in Arizona by greatly increasing the difficulty of accessing many areas of the state. Such an impact will affect the ability of the Game and Fish Department to perform its responsibilities as well as the ability of sportsmen and other recreationalists to engage in their pursuits. (Federal Elected Official, Washington, DC - #19117.71300)

Coordination with the state wildlife agencies to determine which roads are “essential” for access and management. Identification of wildlife management as a critical activity to be maintained within USFS roadless areas and considered during evaluations to determine whether certain activities or characteristics should be protected within these areas. Assurances that the state wildlife agencies’ ability to manage fish and wildlife populations will not be restricted by this proposal (i.e., nothing in the Rule will diminish the state’s jurisdiction and ability to conduct necessary wildlife management activities within USFS roadless areas). (State Agency, Phoenix, AZ - #18663.83500)

Hunting and fishing, p. 1-173 to 3-177. Page 3-173 states that fishing demand will increase over time while success rates will drop. At the same time stocks drop, implementation of this proposal in any form other than Alternative 1 will limit the ability of forest managers to improve habitat and fisheries people from engaging in viable stream-stocking efforts. (Individual, Whitefish, MT - #30417.90000)

## 6.5 Non-Timber Forest Products

Many people are concerned with the collection of non-timber forest products, e.g., mushrooms, firewood, seeds, etc. Many feel the Forest Service should address the effects of the proposed rule on access to non-timber forest products and on rural communities dependent on those products. Respondents state, “The Forest Service must evaluate and disclose the effects the ‘Proposed Action’ will have on rural communities who depend on these miscellaneous forest products for income (sales), domestic use (heating) and business use (fences).” Some, however, feel that harvesting of non-timber forest products should not be allowed in roadless areas. Others feel access should be allowed for firewood cutting and gathering. One individual in particular feels the Forest Service should not limit firewood cutting to within 300 feet of Forest Service roads. Municipalities and private companies request that the Forest Service clarify whether the proposed rule would prohibit traveling into public lands for gathering wild seed. Additionally, say some, the Forest Service should consider natural areas as a source of medicines and of genetic diversity for improved agricultural crops.

### **Public Concern: The Forest Service should address the effects of the proposed rule on access to non-timber forest products and on rural communities dependent on these products.**

It is difficult to discern effects when there is no discussion on the amount of demand for these non-timber forest products. The fact that demand exists is not enough information to conduct an assessment of effects.

Relief: The Forest Service must analyze and disclose the demand for these products, contributions to local economies, and effects of the prohibition alternatives.

COMMENT: General--Traditionally, ranchers and other rural residents have depended on the timber harvest program to access post and pole firewood material for personal and commercial use. They are normally purchased for a small fee that includes a permit. Over time, most of the accessible areas have been utilized. The proposed prohibitions will impact rural residents directly by curtailing the opportunity for future purchase of permits for firewood and post and poles in roadless areas. This proposed rule if implemented would result in increased operating costs accessing non-timber forest products (Page A-21). Roads are essential for the harvest of non-timber forest products.

RELIEF: The Forest Service must evaluate and disclose the effects the “Proposed Action” will have on rural communities who depend on these miscellaneous forest products for income (sales), domestic use (heating) and business use (fences). (County Elected Officials, Cheyenne, WY - #15902.93400)

### **Public Concern: The Forest Service should not allow the collection of non-timber forest products in roadless areas.**

No collection of plants, trees, flowers, mushrooms, berries in roadless areas. (Individual, Whitefish, MT - #8913.93400)

### **Public Concern: The Forest Service should allow access for fire wood cutting and gathering.**

Wood cutters need roads to get their fire wood. (Individual, Cascade, ID - #19617.93200)

We also used those forest roads to get the firewood we needed to keep us warm during a good part of the year. Why deprive the very people who pay for the upkeep of these forests out of the forests. (Individual, No Address - #25194.90000)

**DO NOT LIMIT FIREWOOD CUTTING TO WITHIN 300 FEET OF FOREST SERVICE ROADS**

I disagree with the proposals locally to limit firewood cutting to within 300 feet of Forest Service roads. Especially after you have closed perfectly good roads, and declared the area as “roadless” because the roads are closed. (Individual, Imbler, OR - #5783.93400)

**Public Concern: The Forest Service should clarify if municipalities and private companies would be required to stop traveling into public lands for gathering of wild seed.**

In Oregon, city, county, state and federal agencies currently travel into public lands to hand collect wild and native grass seed, wildflower seed and forbe seed from wild stands of vegetation on public lands. Some privately owned seed collecting companies also collect such seeds on public lands. If our Federal Government wants to do the most it can to protect the ecology of the National Forests--does that mean all the municipalities as well as the private companies must stop traveling into public lands and taking these massive, irreplaceable quantities of wild seed? (Business/Business Association, Portland, OR - #6774.93400)

**Public Concern: The Forest Service should protect roadless areas as a source of medicines and of genetic diversity for improved agricultural crops.**

Natural areas can also be a source of medicines and of raw material used as the genetic base for improved agricultural crops. (Individual, Dickinson, ND - #16095.90000)

As an R.N., I personally know how important these wilderness areas are, especially the rain forests--as areas known to produce plant life that has been proven to be our only connection to cures for major diseases, including cancer. Don't wipe them out! (Individual, Jackson, MI - #3115.93400)

I think the benefits these forests will provide in terms of future pharmaceutical discoveries and other unknown items because we do not have the technology that will exist tomorrow is not to be underestimated. I think we need to preserve these forests for the richness unknown to us now, but that can be realized later is critical. If we destroy this habitat for a quick gain, any potential long term benefits will be lost forever. (Individual, Bear Creek, PA - #12121.93400)

## 6.6 Cultural and Heritage Resources

Many respondents feel the Forest Service should address access to cultural and historical sites. Several state agencies argue that access should be maintained to avoid adverse effects to these sites. “We are concerned that the proposal to prohibit road construction will increase the potential for the neglect of a property which causes its deterioration,” writes one agency. Therefore, “We . . . recommend that for those historic properties that are identified, existing access be maintained to avoid adversely affecting the historic properties.” Other individuals and tribal representatives, however, argue that access should be limited to prevent discovery and/or damage to these sites. Indeed, many people feel the proposed rule should protect roadless areas given that the proximity of a road is the best predictor as to whether an

archeological site will be vandalized. Others state that keeping the existing road definition will aid in cultural site protection. One individual feels European cultural artifacts should be valued as much as Native American cultural artifacts and protected by the same laws.

As required by CEQ (Council on Environmental Quality) Regulations, note some respondents, the Forest Service should conduct a heritage resources cumulative effects analysis for all alternatives. Some feel the Forest Service should disclose the effects of the final rule on federal agencies' ability to fulfill their legal requirement to inventory all lands for cultural properties. The Forest Service should comply with the National Historic Preservation Act by identifying cultural/historical properties and analyzing what impacts the proposed rule may have on them, maintains a state agency from Wyoming. Sufficient funding should be provided to accomplish these goals, this agency asserts.

In addition, the Final EIS should provide a detailed analysis of the paleontological resources that are present in areas proposed for closure, submits a state agency. Other government officials request road access for the excavation and preservation of paleontological resources. A state elected official from Utah comments, "The DRAFT EIS, in a number of the geological discussions, claims that a lack of additional roads prevents destruction through vandalism. This is true, but it also stifles efforts to locate, understand, remove, and preserve fossils which may otherwise decay and be lost forever if simply left to rot on the forest floor or in the near surface." A county elected official likewise remarks, "When many fossils are quarried and cut from rock, the resulting blocks can weigh over 1,000 pounds, as is the case with the proposed Hadrosaur excavation in the Grand Staircase-Escalante National Monument. The unavailability of vehicles to transport these masses of rock equates to an inability to excavate the remains, leaving behind a valuable piece of history and important specimen for studies."

### **Public Concern: The Forest Service should address access to cultural and historical sites.**

#### **MAINTAIN ACCESS TO AVOID ADVERSE EFFECTS**

Pursuant to the National Historic Preservation Act (16 U.S.C. [Section] 470 et seq. and 36 C.F.R. Part 800) the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology ("DHPA") has considered the draft EIS and proposed rule for the Hoosier National Forest in Indiana, for the USDAFS. Based upon the documentation available at DHPA, there are historic buildings, structures, districts, objects, or archaeological resources which may be eligible for inclusion in the National Register within the probable area of potential effects. There are several properties identified in the PERRY COUNTY INTERIM REPORT, INDIANA HISTORIC SITES AND STRUCTURES INVENTORY which are within or in close proximity to the area denoted as an "Inventoried Roadless Area identified in forest plans or other completed assessments adopted by the agency allocated to a prescription that allows road construction or reconstruction" as stated in the Draft E.I.S. We recognize that the Draft E.I.S. mentions that existing legislation requires Federal agencies to carry out certain responsibilities in order to preserve historic properties. However, we are concerned that the proposed rule may hamper the USDAFS's ability to protect historic buildings and structures. In particular, we are concerned that the proposal to prohibit road construction will increase the potential for the neglect of a property which causes its deterioration. We recommend that the USDAFS make an effort to identify and evaluate buildings and structures currently in the Indiana IRA, so that it can take into account the effects, if any, on those historic properties. We also recommend that for those historic properties that are identified, existing access be maintained to avoid adversely affecting the historic properties. Enclosed is a copy

of the PERRY COUNTY INTERIM REPORT for your reference. We believe that the existing Indiana IRA may be within LEOPOLD AND UNION TOWNSHIPS, although the precise boundaries are unclear based upon the maps provided in the Draft E.I.S. (State Agency, Indianapolis, IN - #13528.90230)

The preferred prohibition alternative, Alternative 2, would generally serve to protect cultural resources. However, as pointed out in the DEIS, implementation of this alternative may result in a loss of access to historic properties. This loss of access could result in deterioration of these properties. In accordance with the National Historic Preservation Act (NHPA) regulations, 36 CFR Part 800.5(a) (2) (vi), the inability to access these properties for proper maintenance could result in an adverse effect to significant cultural resources. As also stated in the DEIS, public interpretation of these resources could be hindered. Access to these resources, particularly for the disabled public, could become problematic. (State Agency, Cheyenne, WY - #15887.90230)

#### **LIMIT ACCESS TO PREVENT DISCOVERY AND/OR DAMAGE**

What do tribes see as the potential benefits of preventing any new road construction in roadless areas? THEY SEE LIMITED ACCESS AS A BENEFIT IN PREVENTING DISCOVERY AND/OR DAMAGE TO CULTURAL SITES. (Tribal, Brigham City, UT - #5659.90230)

I've been involved in studying New Mexico history for over 20 years. And the more that you study New Mexico history, you realize that our roadless areas are repositories for much of our state's history. Victorio's Camp in the Black Range, homesteader cabins around El Malpais, Gallinas culture sites up in the Santa Fe National Forest; I could just go on and on and on. Roads threaten sites such as these. I recently was up in the Rio Puerco area in a very heavily roaded area, and as I was walking down one dirt road, I saw, on the road, fragments of pottery that had been broken by a vehicle whose driver I'm sure wasn't aware at all that they were even there. But when you study New Mexico history and you learn to value it, you realize that roadless areas themselves are historic artifacts. These were the areas that shaped our history, they were the setting for our history, and they can still be the setting for our history in positive ways. But when roads are built into these areas, not only are individual sites often destroyed, but the historical quality of the area itself is impaired. They're fragile, they're irreparably broken, and they become just like those pottery shards along the Rio Puerco. (Individual, No Address - #14500.90230)

#### **Public Concern: Given that the proximity of a road is the best predictor of whether an archeological site will be vandalized, the final rule should protect roadless areas.**

As a professional archaeologist and concerned citizen I am writing to comment on the roadless areas NOI. The presence of a road in proximity to an archaeological site or other non-renewable cultural/heritage resource is the best predictor that a site or cultural resource will have been vandalized or illegally collected, depriving future generations of their public heritage. Our cultural resources are rapidly disappearing and increasingly are being damaged through such collection and illegal digging. The public should have access to some areas in a controlled, planned, and regulated fashion, but other areas should be retained in a roadless state to preserve the integrity of our cultural heritage on public lands. (University/Professional Society, Logan, UT - #979.90230)

#### **BY KEEPING EXISTING ROAD DEFINITION**

An additional impact of legitimizing old trails as roads will be the increased ease of motorized access to archeological sites. The Abajos are probably richer in archeological remains than any other district in the Forest Service and deserve better protection. Already people are in prison for illegally raiding sites on Forest Land in the Abajos. The DEIS, if finalized, will make the situation worse. What we are asking is this: keep the old definition of roads and trails. It is easier to understand and is site specific, being based on actual conditions, not a management model. The new definition is confusing and cerebral, with very real negative consequences in the rural west. (Environmental/Preservation Organization, Moab, UT - #57166.90320)

**Public Concern: European cultural artifacts should be valued as much as Native American cultural artifacts.**

Many of these roads are historic trails created during the Comstock Era and represent our cultural heritage. Ironically, if these trails were a Native American cultural artifact rather than a European cultural artifact, they would be protected by federal law. (Individual, No Address - #2236.90230)

**Public Concern: As required by Council on Environmental Quality Regulations, the Forest Service should conduct a heritage resources cumulative effects analysis for all alternatives.**

Heritage Resources

Comment: Entire Section--There is no cumulative effects analysis for this section.

Relief: The Forest Service must conduct a cumulative effects analysis for all alternatives as required by CEQ Regulations. (County Elected Officials, Worland, WY - #16185.90230)

**Public Concern: The Forest Service should disclose the effects of the final rule on federal agencies' ability to fulfill their requirement to inventory all lands for cultural properties.**

Heritage Resources

Comment: Entire Section--It has been well documented that a majority of culturally significant sites on National Forest lands have been discovered due to activities associated with road construction, reconstruction, and timber harvest. In response to Executive Order 11593, charging federal agencies to inventory all lands for cultural properties, the effects of the prohibition alternatives must be disclosed.

Relief: The Forest Service must disclose the effects of the prohibition alternatives on Executive Order 11593. (County Elected Officials, Worland, WY - # 16185.90230)

**Public Concern: The Forest Service should comply with the National Historic Preservation Act by identifying cultural/historical properties and analyzing what impacts the proposed rule may have on them.**

The DEIS further states that under the no action alternative, Alternative A, that additional sites may be located and evaluated as part of project related activities. We agree. However, we wish to remind the USFS that it has further responsibilities to locate and evaluate cultural resources under Section 110 of the National Historic Preservation Act. (State Agency, Cheyenne, WY - #15886.93600)

To be in compliance with Section 106 of the NHPA, the USFS must, prior to implementation of any undertaking under the roadless initiative, identify historic properties which may be potentially affected, assess effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties. (State Agency, Cheyenne, WY - #15887.90230)

**BY PROVIDING SUFFICIENT FUNDING TO FIELD ARCHAEOLOGISTS**

We encourage the USFS to provide sufficient funding to its field archaeologists to comply with Section 100 of the NHPA so that the location, recordation, evaluation, preservation, and interpretation of these resources is not dependant upon project driven funding. (State Agency, Cheyenne, WY - #15886.93600)

**Public Concern: The Final EIS should provide a detailed analysis of the paleontological resources that are present in areas proposed for closure.**

[Provide] a detailed analysis of the paleontological resources that are present in the areas proposed for closure. (State Agency, Laramie, WY - #15888.93530)

**Public Concern: The Forest Service should allow road access for the excavation and preservation of paleontological resources.**

The proposed rule may have a detrimental affect on the preservation of vertebrate fossils. The DEIS, in a number of the geological discussions, claims that a lack of additional roads prevents destruction through vandalism. This is true, but is also stifles efforts to locate, understand, remove, and preserve fossils which may otherwise decay and be lost forever if simply left to rot on the forest floor or in the near surface. (State Elected Official, Salt Lake City, UT - #43918.93530)

Limiting access to these public lands will make the discovery and excavation of new paleontological resources nearly impossible. When many fossils are quarried and cut from rock, the resulting blocks can weigh over 1,000 pounds, as is the case with the proposed Hadrosaur excavation in the Grand Staircase-Escalante National Monument. The unavailability of vehicles to transport these masses of rock equates to an inability to excavate the remains, leaving behind a valuable piece of history and important specimen for studies. As is the case with most of the activities that take place on Forest Service lands, the use of helicopters would not be practical. (County Elected Official, Panguitch, UT - #44073.93530)

## 6.7 Recreation and Travel Management

None of the action alternatives presented in the Draft EIS for the proposed rule directly restrict recreational activities in roadless areas. However, a great number of responses submitted to the Forest Service on the proposed rule address recreational use issues, especially motorized access. Many people do not separate their ability to access national forests for recreational activities from road and trail infrastructure management, so related concerns may be found in Section 6.2. Recreational issues and concerns are divided into the following sections: 6.7.1 General Management; 6.7.2 Access to Existing Roads and Trails; 6.7.3 Motorized Recreation; 6.7.4 Non-motorized Activities; 6.7.5 Recreation Capacity, User Conflicts, and Adequacy of Effects Analysis; and 6.7.6 Public Education, Monitoring, and Enforcement.

### 6.7.1 General Management

Many people are concerned the proposed rule will restrict access for recreational activities and OHV driving. One individual states, “I am concerned that the Clinton/Gore roadless directive could close an additional 60 million acres of our forest lands to campers, hunters, fishermen, off-highway vehicle enthusiasts, snowmobilers, rockhounds, mountain bikers, sightseers, and four-wheel-drive operators.” Many citizens are vehemently opposed to the proposed rule because they fear it will restrict access for the elderly, very young, and/or handicapped. “I am very involved with veterans who have been medically retired from service, are elderly, handicapped, or have young children. New environmental restrictions

would make these people unable to enjoy remote places without road access,” states one individual.

Others feel, on the contrary, that restricting a particular mode of travel is not the same as restricting personal access. One individual requests that the Forest Service clearly state that access on National Forest System lands means the legal right for a person to simply be present on public land and has nothing to do with permitted activities or mode of transportation. In addition, many feel that claims of discrimination and elitism are unfounded. Some point out the plethora of existing roads and trails that will be completely unaffected by the proposed rule, noting that opportunities for motorized access abound on federal lands. Many citizens believe the Forest Service should refute the contention that non-motorized activities in roadless areas are limited to the wealthy, elite, able-bodied and physically fit. One individual explains, “When my condition prevented this [backpacking], it never occurred to me that the public owed me a motorized way to get back there. Instead, I relished the mountains I could get to by automobile on existing roads. And I enjoyed knowing there were protected wildlands, even if I couldn’t get to them. Now I can day hike again, and find that easy walks reduce my back pain. I can only make it a few miles in, but every time I find the damage done to the soils by off-road vehicles I fear that they’re destroying this disabled person’s opportunities to recreate.” One environmental organization adds that recreational activities, “contrary to what has been said, . . . are not activities that only the rich, elite, or extremely physically fit can do--they are possible for anyone with the inclination to do them.” “I have two pins in my knees--if I can walk in, so can the rest!” remarks one individual.

Some members of the public feel they should be allowed to travel on roads that provide access to existing camping and/or recreational areas. One individual recommends the Forest Service should consider a rotation system for open and closed roads. They request the Forest Service “rotate public use of these roads to give opportunities to do maintenance, improvements, and logging.” Another citizen suggests limiting the use of motorized vehicles and necessary access to either authorized agency personnel or handicapped persons on designated routes. To alleviate concerns about access for the disabled, some suggest that the Forest Service should develop special permits for these individuals. “Have the handicapped people that want to get out into the woods apply for a federal or state permit for truly handicapped people. It wouldn’t be any more hard to police than a hunting permit or driver’s license,” submits one individual. Others suggest that motorized access to roadless areas only be allowed for senior citizens. One individual suggests that in some roadless areas the Forest Service provide senior citizen paths, wheel chair access, and short loops for sightseeing. Another individual calls for the Forest Service to make special efforts to provide wilderness opportunities for the physically challenged. Others assert that the final rule should allow development of new campgrounds in roadless areas, with one individual specifically requesting primitive backcountry campsite construction. Similarly, some individuals request improved trailheads and parking areas “for those willing to go into the woods by foot.” In contrast, some members of the public support alternative forms of transportation.

In order to protect roadless wildland values, one environmental group recommends the Forest Service prohibit low over-flights of aircraft except in cases of emergency. The state of



Idaho, however, requests that the final rule explicitly guarantee aviation access to existing public use airports within inventoried roadless areas. This right has been specifically guaranteed for airstrips in several Idaho wilderness areas, they note, and feel that it should be extended to those in roadless areas.

**Public Concern: The Forest Service should consider that the proposed rule will restrict access for recreation.**

Without access to the motorized trails in these areas, and the ability to reconstruct and maintain them when necessary, OHV enthusiasts will lose a valuable opportunity for responsible recreation on public land. (Individual, Clinton, UT - #104.10212)

Please don't lock us out of our public land--help us protect access for all recreationists, including motorized vehicle enthusiasts. (Individual, Clinton, UT - #104.10212)

I am concerned that the Clinton/Gore roadless directive could close an additional 60 million acres of our forest lands to campers, hunters, fishermen, off-highway vehicle enthusiasts, snowmobilers, rockhounds, mountain bikers, sightseers, and four-wheel-drive operators. (Individual, Westminster, CO - #115.10212)

If these lands are closed, my family will lose the opportunity to continue what we do to spend time having fun with each other. This is everyone's land, it belongs to all of us, no one group should be shut out, it is not fair. (Individual, Manchester, MI - #1223.10212)

We oppose the alternatives selected in the DEIS because it decreases public access to the forest for recreational activities--biking, berry picking, snowmobiling, motor recreational activities into limited areas. (Local Community/Civic Organization, Spokane, WA - #6118.10210)

**Public Concern: The Forest Service should consider that the proposed rule will restrict access for the elderly, very young, and/or handicapped.**

I have an injury that prevents me from walking long distances, I have no land to keep a horse, so ATV's are my only option to see the land. (Individual, London, KY - #152.10213)

One maintained road providing access through an area with parking locations scattered along it, would distribute the hikers throughout the area and provide access for handicapped people to at least be able to visually enjoy the area. I would hope that you would seriously reevaluate your access policy to all wilderness areas and at a minimum exclude all taxpayers equally. (Individual, No Address - #160.10213)

I am strongly opposed to your proposal to close roads in national forests. As a paraplegic, my only access to wilderness areas is by 4wd truck. Your proposal discriminates against disabled and elderly people. (Individual, Gloucester, VA - #345.10213)

Why are you people hell bent on bringing this country to the stone ages? We have more and more older people that want to see our forests by ROADS. We also need more campgrounds and recreation areas. (Individual, No Address - #409.10213)

This proposed plan is discriminatory inasmuch as it eliminates persons with disabilities from enjoying the outdoor experience and caters only to a select few, opening the door for possible class-action lawsuits. (Individual, Big Sur, CA - #1045.10213)

Too much forest land is not available to folks too young or old to hike, but would still like to see the backcountry. If we can't use it, why have it!!!! (Individual, AZ - #1253.10213)

I would agree that protection is needed to maintain our lands, but I don't agree with environmental groups' efforts to place these areas off limits to everyone but the most conditioned athletes who can hike miles into the wilderness. I am very involved with veterans who have been medically retired from service, are elderly, handicapped, or have young children. New environmental restrictions would make these people unable to enjoy remote places without road access. (Individual, Eugene, OR - #3257.10213)

**Public Concern: The Forest Service should clearly state that access to National Forest System lands means the legal right for a person to simply be present on public land and has nothing to do with permitted activities or mode of transportation.**

In addition, the ORV users raised the straw man of access for handicapped people. Universal access for all works well in civilized, developed parts of the nation, where provisions for physical access cost relatively little and make sense. However, in the large areas of Forest Service land, especially those managed for natural values, insisting upon universal physical access leads quickly to absurdity. We would have to build roads on both sides of every stream, along every ridgeline, and to the top of every summit. Not only that, but the roads must necessarily all be useable by any street licensed vehicle. Very few handicapped and elderly drive 4WD vehicles. In addition, we must upgrade all existing 4WD roads for use by street licensed vehicles. All those roads would totally eradicate the natural values for which the land was being managed. Add to that the cost of such an endeavor and the absurdity becomes overwhelming. Obviously the initial premise--universal physical access to all public lands--is not valid.

Access on Forest Service lands means the legal right for a person to go to and be present on a piece of public land. It has nothing to do with what activities the person may engage in while on that piece of land or the mode of transportation used by the person to get there. These are entirely separate issues that have nothing to do with access. (Individual, Lakewood, CO - #12965.91610)

**Public Concern: There are more than enough roads to meet the needs of the elderly and handicapped and allow them to experience public wildlands.**

As for the elderly and the handicapped, it is important that we provide roads on Forest Service lands that allow them to experience as best they can the beauty and joy of these lands. This does not necessitate construction of roads to every nook and cranny. With more than 386,000 miles of roads in the Forest road system, plus all the miles of county, state, and federal highways that cross Forest Service lands, there are more than enough roads already existent to meet the needs of the elderly and handicapped. (Individual, Lakewood, CO - #12965.91700)

**Public Concern: The Forest Service should refute the contention that non-motorized activities in roadless areas are limited to the wealthy, elite, and physically fit.**

Another issue...is access to the backcountry for the disabled. I am disabled with severe back problems. I used to backpack to find the quiet and beauty I love in the mountains. When my condition prevented this, it never occurred to me that the public owed me a motorized way to get back there. Instead, I relished the mountains I could get to by automobile on existing roads. And I enjoyed knowing there were protected wildlands, even if I couldn't get to them. Now I can day hike again, and find that easy walks reduce my back pain. I can only make it a few miles in, but every time I find the damage done to the soils by off-road vehicles I fear that they're destroying this disabled person's opportunities to recreate. (Individual, Butte, MT - #53008.91610)

Even with protection, these forests will still be open to a staggering number of activities, including but not limited to: hiking, camping, backpacking, horseback riding, fishing, hunting, canoeing, rafting, kayaking, rock climbing, mountain climbing, mountain biking, cross-country skiing, snowshoeing, birdwatching, running, walking, swimming in lakes, looking at stars, breathing deep fresh air, taking pictures, meeting Nature on its own terms, listening to the birds sing, enjoying the silence, looking at the mountains, vistas, flowers, trees, and marveling at life in the forest. Contrary to what has been said, these are not activities that only the rich, elite, or extremely physically fit can do--they are possible for anyone with the inclination to do them.

(Environmental/Preservation Organization, No Address - #1826.91700)

I would...like to see any form of mechanized travel banned in, on or above areas designated as wilderness (cars, dirt bikes, helicopters, etc.). I have hiked and climbed for over 30 years and [this is] the major problem and danger to any wilderness boundaries and national park boundaries. I have two pins in my knees--if I can walk in, so can the rest! (Individual, Shelton, WA - #388.64150)

And who will use these areas? We all will!!! Roadless areas will help maintain a livable environment for all. Many of us will enter on horseback, both private and with packer, while others will choose canoe or kayak. A great many others will choose to use these areas on foot, as I have since the 1940's. (Individual, Cambria, CA - #11348.91000)

**Public Concern: The public should be allowed to travel on roads that provide access to existing camping and/or recreational areas.**

As a person who has enjoyed driving and hiking in National Forests for many years I have a firm belief that this privilege should be continued on roads that meet the following criteria:

The road provides access to existing camping and/or recreational areas. (Individual, Sun Lakes, AZ - #10732.91000)

These forests are ours to use and the more roads, campgrounds and areas we can get to the more we can enjoy it. (Individual, La Grande, OR - #11292.91700)

**Public Concern: The Forest Service should consider a rotation system for open and closed roads.**

I recommend you open more maintained roads to the public, since it was Federal Funds that built them, and do regular maintenance and improvements on all other F.S. roads. You could rotate public use of these roads to give opportunities to do maintenance, improvements, and logging. (Individual, Noxon, MT - #3405.71300)

**Public Concern: The Forest Service should limit the use of motorized vehicles to necessary access by either authorized agency personnel or handicapped persons on designated routes.**

Please limit the use of motorized vehicles to necessary access by (1) authorized agency personnel and their appointed sub-contractors, performing necessary maintenance and emergency intervention, and (2) handicapped persons on designated trails. (Individual, Cupertino, CA - #286.61300)

All existing roads in the Forest Service system should be gated wherever possible with the ability to circumnavigate these gates by handicapped and senior citizens only. (Cornelia, GA - #9392.84610)

**Public Concern: The Forest Service should develop special permits for disabled individuals.**

I have a suggestion that might work or at least for you to consider, have the handicapped people that want to get out into the woods apply for a federal or state permit to truly handicapped people. It wouldn't be any more hard to police than a hunting permit or driver's license. (Individual, St. Louis, MO - #13237.10213)

**Public Concern: The Forest Service should allow motorized access to only those over 65 years of age.**

As you must be aware, the average age of the population is increasing, and so is the need for roads where senior citizens can see and appreciate this natural tax supported environment. Limit the roads, but do not eliminate them. Allow only those over 65 use of the roads, and make those able to walk do so. These are the ones that want this issue passed anyhow. (Individual, Ryderwood, WA - #6398.10213)

**Public Concern: In some roadless areas the Forest Service should provide senior citizen paths, wheelchair access, and short loops for sightseeing.**

The idea that a roadless area is closed to the public is simply not true. The Forest Service will have to make an effort to counter the idea that these areas are closed, when in fact we should be encouraging their use and appreciation. Some areas should be promoted and expanded to provide senior citizen paths, wheel chair access, and short loops where the less able are still given an opportunity to visit the wild diversity of natural areas across the country. (Individual, Boise, ID - #1661.61300)

**Public Concern: The Forest Service should make special efforts to provide wilderness opportunities for the physically challenged.**

Special efforts should be made to also provide wilderness opportunities for the physically challenged. (Individual, Central Point, OR - #13102.93642)

**Public Concern: The final rule should allow development of new campgrounds in roadless areas.**

Also...campgrounds in the edge of the roadless area should BE permitted. Campgrounds should be permitted to be constructed in the interior of the area without roads being built to them. (Individual, Carson, WA - #13433.91700)

**DEVELOP REMOTE INTERIOR CAMPING SITES**

Remote interior camping sites-similar to those proposed in Denali State Park South side-should be considered and would require some timber removal. (Individual, Anchorage, AK - #17438.91740)

**Public Concern: The Forest Service should consider installing additional trailhead or parking areas.**

...the Chugach N.F. is closest to Alaska's major population center of Anchorage. Some minimal trailhead or just plain parking areas should be available for those willing to go into the woods by foot. The foot trail into Ptarmigan Lake is a good example but a real trail out to the Paradise Lake cabins is a better alternative than any type of "road" to either place. (Individual, Anchorage, AK - #17438.91740)

**Public Concern: The Forest Service should consider introducing public transportation.**

I would like to see highly regulated and limited use of vehicle traffic in existing forests and introduction of other forms of transportation such as trains that reduce pollution and accommodate large numbers of visitors at once, trams and busses... (Individual, Boise, ID - #15967.91610)

**Public Concern: The Forest Service should prohibit low over-flights of aircraft except in case of emergency.**

...If roadless area characteristics associated with Wildlands Values (DEIS 3-161), many of which are recognized and valued by the American Public, are to be preserved, the following management guidelines must be adopted:

...Low over-flights of all aircraft prohibited except in case of emergency. (Environmental/Preservation Organization, Albuquerque, NM - #43737.90240)

**Public Concern: The final rule should explicitly guarantee aviation access to existing public use airports within designated roadless areas.**

Our primary concern is the preservation of public use airports and associated aviation activity within the inventoried roadless areas in the State of Idaho. The DEIS and meeting presentations did not specifically address airports or aviation activities within roadless areas....We have attempted to determine the impact of the two preferred alternatives on the existing public use airports located on Forest Service lands in Idaho. The Forest Service airports located in the Selway Bitterroot Wilderness area are allowed to remain open under the provisions of the 1964 wilderness legislation. Airports in the Frank Church River of No Return Wilderness are specifically protected under the provisions of this particular wilderness legislation. Airports located outside of wilderness areas are located adjacent to existing maintained roads and should not be impacted by the proposed preferred alternatives. The Graham USFS Airport is in an area that has been recommended for wilderness classification by previous Forest Service planning documents that would require Congressional action for wilderness designation. In Addition, the DEIS states that "existing access to inventoried roadless areas for recreation opportunities would not change because of this proposal." (State Agency, Boise, ID - #18629.71100)

## 6.7.2 Access to Existing Roads and Trails

Many citizens feel they have a right to access existing roads or trails and that the Forest Service should not deny the public access. An individual from Alaska claims Forest Service roads are necessary for routine activities and medical emergencies until a better highway system can be developed in Alaska. Another citizen states, "Some of the old roads that my father and grandfather used and helped build over a hundred years ago have been closed. I

see no harm in keeping them open.” Many motorized recreational users request that the Forest Service retain roads for logging in an unmaintained state and open to off-road vehicle use. The Forest Service should not improve all of the remaining roads because many off-road enthusiasts prefer technically challenging roads, they point out. Respondents also request that all unmaintained roads be left open, and argue that these roads not become classified or upgraded for travel in stock vehicles. In addition, many people feel if a road is of historical or scenic significance, the Forest Service should not take away recreational access.

Often members of the public request information about impacts of the proposed rule on the status of specific roads or trails they are closely associated with. Some fans of competitive events on public lands assert that the final rule should include provisions to keep trail and road access open for trail dependent competitions, such as bicycling, equestrian events, and Enduro motorcycle challenges.

Some feel the Forest Service should reverse its road closure and restriction policy by opening gated roads. Roads that have been blocked off by the Forest Service should be reopened in case of fire, states one individual. Others feel special preference should not be given to people with leases or special use permits because everyone should have equal access. Additionally, one individual writes, if a road has already been improved to the status of an “all weather” road, access should be granted to the public. Finally, many non-motorized users request that some of the trails in roadless areas be restricted from motorized use.

### **Public Concern: The Forest Service should keep existing roads and trails open to public access.**

I have lived in areas of Alaska that relied upon USFS roads to get to a medical clinic in the case of a serious medical emergency. I have known people who would have died if it wasn't for those roads. They are far more economical to build than the highways that we have in the lower forty-eight, but they do serve a bigger purpose than just accessing timber. There simply is not the money to build proper highways in Alaska to provide a good highway system like everyone else has in this country, but USFS roads can be an economical alternative. I am sure that logging roads were an important part of fulfilling the transportation requirements of the West as it became more and more populated. USFS roads are equally important to many of us in southeast Alaska until something better is here. We deserve the same opportunity to develop that most of our other States had. (Individual, Ketchikan, AK - #199.71300)

Some of the old roads that my father and grandfather used and helped build over a hundred years ago have been closed. I see no harm in keeping them open. My jeep is my only way of seeing these places that we all love, also wish a little maintenance would be done to keep them passable. Please don't close any more. (Individual, Manti, UT - #818.71300)

As an active off-road motorcyclist, I oppose the proposed closing of trails and roads in our national forests. The forests are for all taxpayers to enjoy and use. I wish to continue that right. (Individual, Carlsbad, CA - #947.71300)

While I can support the concept of roadless area conservation, I do not support closure of existing roads except when two roads start and stop in the same general area, one could be closed, the other left open. After reading the Roadless Area conservation booklet thoroughly it appears that there is enough room in the definitions for local managers to close existing roads. The way I read this an unroaded area is an area without a classified road. So therefore most of the roads I travel on are unclassified. According to procedural alternative “B” local

managers after evaluation could close an unclassified road in order to protect the area's roadless area characteristics. I don't support the closing of any existing road. (Individual, Las Vegas, NV - #1261.71300)

There are many of these roads that have been in use for 20 to 50 years or more, but because they are not "classified" as roads, they are being closed. This is WRONG, and it will backfire on you in the long run. (Individual, Springdale, AR - #2273.71300)

I like having access to 4X4 roads. I agree that we have enough of them in Nevada and don't need to build any more. I still think they should be open to motor vehicles. (Individual, Carson City, NV - #787.91710)

Page 3-171 and Page 172--The effects analysis must recognize that the inventoried and uninventoried roadless areas currently provide some level of motorized recreation on "unclassified roads." This use must be evaluated in order to adequately disclose effects. Any decision to restrict use on these roads must be based on a complete and thorough inventory of all existing roads and use levels. Without this determination it is impossible to accurately evaluate the impacts of the alternatives.

RELIEF: The Forest Service must conduct an inventory of these uses on a local basis and disclose the effects the "Proposed Action" will have on local motorized recreation and communities. (County Elected Officials, Basin, WY - #43980.90010)

By placing restrictions on the public and not allowing them to use the ground we all pay taxes on then you create tension within the public and this creates vandalism and many radical groups who are bent on causing trouble. (Individual, No Address - #7082.41500)

Unclassified roads that require no maintenance currently exist on many National Forests. They have provided cost effective access to forest users over the past 100 years, some being the only vehicle access to high quality hunting, fishing and other dispersed recreational opportunities. These unclassified roads should continue to be made available to recreational users. (Recreational Organization, Dardanelle, AR - #19474.91710)

### **Public Concern: The Forest Service should retain roads for logging in an unmaintained state and open to off-road vehicle use.**

ALL roads built by the Forest Service and paid for by public funds for tractor trailer log trucks should remain ungraded and open to OHV. Maintained or not. (Individual, Golden Valley, MN - #8261.10210)

The proposed rule notes that remaining roads will be improved. Some roads should NOT be improved. The joy of recreating in the National Forest is the availability of technical, difficult to traverse dirt roads/trails. The National Forest does not need to offer paved experiences like National Parks. (Recreational Organization, No Address - #9089.71300)

### **Public Concern: The Forest Service should not close unmaintained roads. Unmaintained roads should not become classified or upgraded for travel in stock vehicles.**

The plan seems to focus too much on "classified roads" while ignoring the existence of unclassified roads. Here in Southern Arizona, there are many unmaintained (a better description than unclassified, even though they aren't classified) roads within and outside the national forests. These unmaintained roads provide an extremely valuable resource for off-highway recreation such as 4-wheel-drive travel, motorcycle and mountain bike travel. For the most part, these roads were created 50-120 years ago when there was considerable dispersed mining in the area. As a four-wheel-drive enthusiast, these unmaintained roads and trails have provided me with a fantastic opportunity to enjoy the scenery, flora and fauna of southern Arizona. My worries are that by not being classified, these roads will be closed entirely, or if they were classified they might then be

maintained for travel in stock vehicles and thereby ruin the challenge of 4WD recreation. (Individual, Tucson, AZ - #13317.91710)

**Public Concern: If a road is of historical or scenic significance, the Forest Service should not take away recreational access.**

As a person who has enjoyed driving and hiking in National Forests for many years I have a firm belief that this privilege should be continued on roads that meet the following criteria:  
The road is of historical or scenic significance. (Individual, Sun Lakes, AZ - #10732.90200)

**Public Concern: The Forest Service should address the impacts of the proposed rule on the status of specific roads or trails.**

I am concerned about how the Roadless proposal will impact Los Padres National Forest. And because it is not a state highway, what will happen to Lockwood Valley road? Because of the geography of Los Padres, particularly the eastern and northern accesses to the Dick Mith and San Raphael wilderness areas, deterioration of existing access roads will severely inhibit wilderness access. In particular, what will happen to the Tinta Canyon, Santa Barbara Canyon, and Sierra Madre access roads? It is a long, exposed, dusty hike from Highway 33 to the Tinta Trailhead--and even worse for Santa Barbara/Mulduce Trailheads! (Individual, No Address - #7662.91000)

I would hate to see existing USFS trails (such as the Lost Lake Trail from the McKinnney Rubicon) be forever closed and not maintained. Since this was a preexisting OHV trail designed specifically for the USFS and recreational use, it should still be maintained under the Roadless initiative, only if the Roadless Initiative is truly going to maintain preexisting trails within the USFS and areas of "reconstruction". (Individual, Dover, MN - #7663.91712)

We also protest the Forest Service not maintaining main canyon roads such as the Manti Canyon Road, which is only being maintained, to the camp ground. (Individual, Manti, UT - #11371.71300)

**Public Concern: The proposed rule should include provisions to keep trail and road access open for trail dependent competitions.**

**NON-MOTORIZED**

This proposal sounds pretty good on the surface, but where are the provisions which would keep trails and road access to these areas for the recreational bicyclist and the equestrian? Or the access for trails dependant competitions such as competitive trail? (Individual, No Address - #6996.91750)

There are a lot of horsemen and horsewomen out there who love to ride in the parklands. I am against any proposal which would limit:

- a) groups riding together
- b) people riding in pairs
- c) competitions such as competitive trail or Endurance from using the lands. (Individual, No Address - #6996.91730)

**MOTORIZED**

We also ride in organized events held on Forest lands. These events are called "endures," and they are closely monitored by the US Forest Rangers. Enduros have been held on US Forest lands for over 50 years. These



events will not be allowed under this “Roadless Initiative.” With a long history of excellent land use, I hope you would support the continued use of these lands for the responsible recreation of myself and many like me. The multiple motorcycle clubs across the US have worked closely with the US Forest Service system for many years to assure the safe use of these areas by motorcycle and ATV riders. (Individual, Baton Rouge, LA - #13513.91712)

**Public Concern: The Forest Service should reverse its road closure and restriction policy by opening gated roads.**

The Forest Service must reverse its road closure policy and restrictions and open gated roads to public access. I have heard many complaints year after year about roads being closed and gated each year for no other purpose than to stop hunters from hunting in these areas. The environmentalists want nothing but complete closure of all human activities on all lands including private owned lands. They will go to any link to get this done, mostly illegally. (Individual, Hamilton, MT - #7260.71300)

I am writing to say that I am against any road closures in our National Forests. All roads that have been closed in the last ten years, should be reopened. (Individual, Ironwood, MI - #2903.71300)

**Public Concern: The Forest Service should open blocked roads on National Forest System land in case of fire.**

The roads that are blocked off should be opened up on Forest Service land in case of fire. (Individual, Beaver, WA - #8116.84200)

**Public Concern: The general public should be allowed access to the same public lands as people with leases or special use permits.**

Often a rancher leases public lands and because the only road into the public land crosses the rancher’s private property, the rancher can block public access by closing the road. This essentially creates private land out of public land. The rancher can access the public property himself but the public cannot. Either new roads should be cut into these areas, or leases should be changed to force the lessee to provide the same access to the public that the lessee enjoys. It should be simple. If the lessee has foot access, the public should have foot access. If the lessee has vehicular access, the public should have vehicular access. (Individual, Tucson, AZ - #2187.90310)

It is our contention that there is, indeed, conflicting interests that must be reconciled in regard to the hundreds of thousands of acres of national forests that are unavailable to the American public because the Forest Service has seen fit to issue commercial outfitting permits to parties who deny access to portions of the national forest. The result, of course, is that these parties are rewarded for their actions that deny public access. They are, in fact, encouraged by agency policy to continue blocking the public from using the national forests. We believe the Forest Service should issue outfitting permits only for portions of national forest land that are accessible to the public. (Recreational Organization, Billings, MT - #830.91300)

**Public Concern: The Forest Service should not allow guides to take four wheelers or horses on logging roads closed to the general public.**

Guide licenses should not be allowed to take four wheelers on logging roads. Guides should not be able to use horses. They should walk like everyone else. (Individual, Salida, CO - #8417.64150)

**Public Concern: If a road has already been improved to the status of an “all weather” road, access should be granted to the public.**

As a person who has enjoyed driving and hiking in National Forests for many years I have a firm belief that this privilege should be continued on roads that meet the following criteria: The road has already been improved to the status of an “all weather” road. (Individual, Sun Lakes, AZ - #10732.71300)

**Public Concern: National forest roadless areas should have hiking trails which are not open to vehicle use.**

National forest roadless areas should have hiking trails which are not open to vehicle use. Motor vehicles pose a major threat to all wildlife. (Individual, Santa Cruz, CA - #9864.91610)

### 6.7.3 Motorized Recreation

Motorized recreation encompasses comments about the use of motorized vehicles, off-highway vehicles, snowmobiles, and watercraft on National Forest System lands. This section is further subdivided into the following: 6.7.3.1 Motorized/Off-Highway Vehicle Recreation on Forest Lands; 6.7.3.2 Motorized/Off-Highway Vehicle Recreation in Roadless Areas; 6.7.3.3 Limitations on Motorized/Off-Highway Vehicle Recreation; and 6.7.3.4 Maintenance of Motorized/Off-Highway Vehicle Recreation Trails and Areas.

Public comments reported in 6.7.3.1 address concerns over motorized/OHV recreation on forest lands. People often do not distinguish between restrictions on National Forest System lands in general and perceived restrictions of this roadless area initiative. Many constituents feel the Forest Service should allow continued motorized recreation in national forest lands. Some suggest we need to compromise on this issue. “Add some more roadless areas while at the same time guaranteeing that existing areas remain open to multiple use, such as ATVs,” suggests one individual. Others, however, contend that motorized recreation leaves no long-term environmental damage and that as tax paying citizens they have a right to motorized use on National Forest System lands.

Some citizens advise the Forest Service to consider the impacts of vehicle use and the conduct of the users on the National Forest System resources. They contend that vehicle users are often responsible for “vandalism of facilities” and wandering “in search of secluded places for dope use or deals.” Such concerns prompt some members of the public to recommend that the Forest Service designate roaded areas that can be sacrificed for destruction by off-road vehicle uses. Similarly, others believe the Forest Service designate such areas but rotate them when signs of environmental damage occur.

A few respondents suggest that the Forest Service implement a series of linked trails for off-highway vehicle access. Some argue, however, that motorized recreational use should be restricted. Others say the Forest Service should eliminate off-road travel all together. These members of the public claim that OHVs “spew out air pollution, pollute the ground,” and “destroy the ecosystem by fragmenting the land.” They say that by banning OHVs we are taking “a step that might help our national forests recover.” These respondents proclaim that

OHVs degrade the value of experiences on national forest lands. “The sound of a two-stroke engine whining through the woods is not what I want to hear when I go hiking or bird-watching in national forests,” professes one person, a concern echoed by many non-motorized users.

Proponents of snowmobiling aver that the Forest Service should allow snowmobiling on national forests. Some constituents are particular concerned with being forced to adhere to “snowmobile trails.” They contest that “once you have five to twelve feet of snow, there is no such thing as a trail.” Furthermore, if snowmobiles are constrained to groomed trails, the Forest Service “will kill snowmobiling in the West.” Others request specifically designated and developed winter motorized trails for snowmobilers to minimize illegal entry and reduce safety hazards. One individual would like the status of off-road motorized travel in the Wayne National Forest to be clarified.

Comments reported in 6.7.3.2 address motorized/OHV recreation in roadless areas. Many people express strong emotions about this topic. A great number of respondents believe such recreation should be allowed. One individual states “ALL ACTIVITIES INCLUDING MOTORIZED RECREATION, INCLUDING 4 WHEEL DRIVE (JEEP TYPE) VEHICLES MUST BE ALLOWED TO CONTINUE ON ALL ROADS AND TRAILS IN THE AREAS DESIGNATED ROADLESS.” Others feel the Forest Service should honor traditional OHV use by allowing them to continue recreating in certain areas. On the other hand, several environmental groups feel OHVs should be prohibited, suggesting that a mere “visual survey” will “reveal the destruction they have caused.” Many people feel OHVs should be immediately banned on National Forest System lands. “Dirt bikes and other off-road vehicles should be barred from roadless areas NOW, not addressed later,” writes one individual.

Several respondents also support banning watercraft and powerboats in roadless areas. They feel watercraft and powerboats should be restricted to certain areas outside of roadless areas. Likewise, many people argue the Forest Service should ban snowmobiles from roadless areas. Conversely, others want assurances made that snowmobile recreational activities will not be impacted.

Comments reported in 6.7.3.3 address limitations on motorized/OHV recreation. Many respondents are concerned over the Forest Service’s failure to restrict off-highway vehicles use in the proposed rule. Some ask the Forest Service to justify its reasoning for not including such restrictions. Many others, however, ask the Forest Service to include such restrictions in the rule or to initiate a separate rulemaking to address this issue. Respondents agree it is time to establish clear and permanent guidelines for OHV use.

Many other respondents, however, believe off-highway vehicle use should be evaluated on a case-by-case basis. Three methods of reducing motorized vehicle conflicts are mentioned, including spatial separation, limitations on the numbers of users, and seasonal limitations. One motorized user, for example, proposes that the Forest Service divide national forests in half with one side open to off-road vehicle use and the other closed to off-road vehicles. Some members of the public suggest limiting the number of motor vehicles with a permit

system. Another suggests that the Forest Service should limit the hours during which off-road vehicles may operate during hunting season to limit user conflicts and damage by OHVs.

The public is also concerned with pollution and noise created by motorized vehicle recreation. Several respondents advocate that the Forest Service require the use of lower-emission off-road vehicles. To that end, some individuals request that the Forest Service set reachable goals and mandates for pollution and noise and gradually institute these policies. The Forest Service should place more restrictions on personal watercraft, such as jet skis, some believe, and many specifically support a ban on two-stroke engines. In contrast, a few individuals do not want to see any more restrictions on two-stroke watercraft engines.

Most individuals who comment on the topic of designated routes prefer restricting motorized vehicles to designated routes, however opinions differ as to whether they should be confined to trails or roads. In addition, opinions differ about whether to implement a “closed unless signed open” policy on National Forest System lands. Some respondents support it, while others are opposed.

Comments reported in 6.7.3.4 address the maintenance of motorized/OHV recreational trails and areas. Many groups request the Forest Service to recognize and encourage more volunteer work by the OHV community in road and trail maintenance programs. “I am extremely disappointed by the refusal of the Forest Service to recognize the countless hours of volunteer time I, and others like me, have spent to maintain OHV sites in our area. Continued failure to recognize the many contributions of the OHV community will only serve to punish those who are actively working toward a solution to a symbiotic relationship between recreation and conservation,” writes one individual. Some people believe the Forest Service should require that OHV groups adopt and maintain trails to standard to prevent closure.

On the other hand, several individuals feel the Forest Service should not maintain roads because recreational users enjoy the challenges they provide. One individual states, “We like the existing roads (trails, byways, passages, and whatever else you may call them) the way they are, in their poorly maintained state.”

### 6.7.3.1 Motorized/Off-Highway Vehicle Recreation on Forest Lands

#### **Public Concern: The Forest Service should allow continued motorized recreation in national forest lands.**

What we could use is more multiple use trails for ATVs, snowmobiles, horses, biking and hiking. We could also designate backwoods recreation areas. (Individual, Sheridan, WY - #3512.91700)

As an avid outdoorsman, as well as an environmentalist, I fully support the responsible usage of OHV and motorized recreational activities on these lands, given proper guidelines and planning. As a taxpayer I strongly believe that portions of these areas in each locale should be made and remain available for OHV recreational purposes. (Individual, Chandler, AZ - #476.91710)

Do the right thing. Create more opportunities for outdoor recreation on federal lands, including motorized recreation. (Individual, No Address - #1554.91710)

Sure I like to hike even backpack. But there are a lot of people who do not or cannot. What about them are they only going to be able to see these lands from the outside? I think if you do not let people enjoy the land by snowmobiling, motorcycling or just off-roading on roads they will not see it. So in the long run people will not appreciate the forest because they can never go there unless they walk in. (Individual, No Address - #3957.10210)

We need to compromise by adding some more roadless area while at the same time guaranteeing that existing areas remain open to multiple use, such as ATVs and horses etc. (Individual, No Address - #8.91700)

#### IT CAUSES NO LONG TERM DAMAGE

I believe the off road community does minimal impact to the land. I have seen trails disappear in a matter of several years which have been abandoned due to a fallen tree or such, showing there really is no long term damage. (Individual, No Address - #6292.80000)

I support existing use of trails in the forests in Colorado. I enjoy a trailbike/rockhounding use and do not want new steel gates keeping me from areas I've previously enjoyed, all by using existing jeep roads. I stay on the trails. My bike is street legal with spark arrester, just as the manufacturer delivered. I feel if these machines are properly used, the damage to [the] environment is not a problem on roads that are many years old. (Individual, Wichita, KS - #7605.10212)

This letter is in regards to the possible land closing to OHVs. I have been riding off road vehicles for about 25 years now. I have not been able to ride places like Colorado or Utah or any place that might be considered to be closed by this law. I don't really understand what is trying to be accomplished by this. They say that this land is getting destroyed by OHV's, which I find hard to believe. There is just not enough of us to destroy this much land. I feel that this is being done, because it can be. This might be because we are a small group, and that getting this passed might look good on some politician's resume. If, the government was genuinely trying to accomplish something, like saving our environment, wouldn't their (I mean our) money, and the earth be better off having them do something that actually made an impact. There are many ways to make a great impact other than eliminate something that probably adds up to an ant hill. What I mean by this is I can't believe that every new mall, highway, housing development, every factory pouring out smoke, every jet airliner leaving a gas tail behind it and the list goes on, isn't being nailed to the cross like OHV riding is. (Individual, No Address - #13267.91712)

#### **Public Concern: The Forest Service should consider the impacts of vehicle use and the conduct of the users on the National Forest System resources.**

For more than 28 years I have watched the increasing vehicular use of the National Forest lands close to my home. Easily 70% of this use is just mindless wandering; often in search of secluded places for dope use or deals. Vandalism of facilities, sign and anything else that comes easily to hand is never ending. These are NOT the quiet kind of forest lands that I used to hunt and hike with my father sixty years ago.

In those days we did not need, even if we could have afforded, ATV's, 4-wheel drives or snow-mobiles. I do not remember seeing beer bellies on the back-woods people of my youth. They walked or rode horseback. (This included the rangers of that time.) We did not go hunting or fishing in order to be drunk or disorderly. I do remember campers in the 1930's getting together and singing around their campfires. Now it's Boom Boxes, Beer and Blast. As to the modern "outdoorsmen": they constantly confirm the statement, 'No one ever went broke underestimating the bad taste of the American public.' (Individual, Jackson, WY - #7126.90200)

**Public Concern: The Forest Service should designate roaded areas that can be sacrificed for destruction by off-road vehicle uses.**

Designate sites within the National Forests, excluding inventoried roadless areas, for sacrifice to ORV users. These should be designated destroyable properties. (Individual, Houston, TX - #8305.91712)

**SET ON ROTATING BASIS FOR OFF-ROAD MOTORIZED RECREATION**

I don't think all ATVs should be banned...but maybe work a way out where you can designate areas to ride for a while and then when the damage starts getting bad change it to a different area and let the old growth back. Just set up signs, or let the public know by maps at one of your offices where riding is allowed and not allowed. (Individual, Brookport, IL - #3182.91612)

**Public Concern: The Forest Service should implement a series of linked trails for off-highway vehicle access.**

While I enjoy being able to hike, cross-country ski and mountain bike in areas where motorized vehicles are not present, I think it is very important that there are a series of linked trails that are open for off highway vehicle access. (Individual, Sonoma, CA - #7000.91700)

**Public Concern: The proposed rule should restrict motorized recreational use.**

We wish to restrict off-road vehicle use to control damage to roadless areas. (Individual, Bishop, CA - #2717.83000)

Self interest groups, such as snowmobilers, four-wheelers, etc. show little concern for anything other than their own activities. (Individual, No Address - #6950.41000)

**Public Concern: The Forest Service should eliminate off-road travel.**

Although I love motorcycle riding, I also love the beauty that only nature can provide. I have seen the damage that responsible and irresponsible riders of dirt bikes and the like have done to natural areas. Besides digging up the soil, causing erosion problems, these vehicles destroy plant life, and disturb animal life. The sound of a two-stroke engine whining through the woods is NOT what I want to hear when I go hiking or bird-watching in a National Forest. These vehicles also spew out air pollution and pollute the ground and water when there is an oil, grease, or gasoline leak. (Individual, No address - #1222.91000)

As you know, there is a powerful industry behind this—the manufacturers of the new equipment and the oil industry. The “Wise Use Movement”, especially the Blue Ribbon Coalition, influence so-called ‘sports’ people to “take back your land.” Our national forest and BLM lands belong to all the people and no one group should be allowed to invade and cause damage to them. (Individual, No Address - #6058.41700)

Roads help to destroy the ecosystems by fragmenting the land and making it available for logging, mining, all-terrain vehicles, off-road vehicles, etc., which end up with the loss of watersheds and riparian areas just to name two delicately balanced systems. (Individual, Albuquerque NM - #7519.83000)

Banning off-road vehicles would be an additional step that might help our National Forests recover. I frequently see rare and beautiful wild plants destroyed by vehicles in our forests. I personally witness areas of erosion that destroy hillsides. (Individual, Idaho Falls, ID - #7170.83000)

When I think of how the wildlife and watersheds are corrupted and contaminated by these vehicles it makes me sick. Let's protect the habitat, maintain wildlife diversity and restore declining stocks of threatened fish such as our salmon. (Individual, Bellingham, WA - #8331.83000)

**Public Concern: Snowmobile use should be allowed in the national forests.**

We request that you manage the forest with consideration to the snowmobiler. We request that you enhance our opportunities, not reduce them. (Recreational Organization, La Pine, OR - #6739.9173)

**OFF-TRAIL TRAVEL**

As to snowmobiles, once you have 5 to 12 feet of snow, there is no such thing as a trail, except where grooming equipment has covered major road areas and marked them as trails. We live in the West where there is deep powder. We ride groomed trails ONLY to get to the good snow. There are some snowmobiles built just for trail riding. We ride sleds built for deep powder. If snowmobiles are banned from all areas except groomed trails, you will kill snowmobiling in the West. Is that your intent? (Individual, Hyrum, UT - #2927.91713)

**Public Concern: The Forest Service should develop continuous trail systems for snowmobilers to minimize illegal entry and reduce safety hazards.**

If we are not allowed to go through national forests in winter via snowmobile, it will force snowmobilers to either enter illegally or go around via plowed roads. One of our main goals in having a continuous trail system is to keep snowmobilers in the areas designated for their use. If we can't do that, we will have a lot more safety issues. We don't want snowmobilers running down a plowed road with automobile traffic. People will be hurt and killed. That's a proven fact. (Individual, No Address - #9912.91200)

**Public Concern: The Forest Service should clarify whether the Wayne National Forest is slated to be closed to off-road motorized access.**

Please inform me of the status of the Wayne National forest and off-road motorcycle access. I understand there is a move afoot to close this area to riding? (Individual, No Address - #15421.10212)

### 6.7.3.2 Motorized/Off-Highway Vehicle Recreation in Roadless Areas

**Public Concern: The Forest Service should allow motorized off-highway vehicle recreation in roadless areas.**

I am concerned that our President's Roadless Initiative will result in the permanent banning of many forms of vehicular off-highway use. (Individual, No Address - #563.91700)

Language providing explicit support for preservation of ALL recreational values should be included in the proposed rule as well as values, INCLUDING OHV recreational values. (Individual, Moses Lake, WA - #7991.91000)

The 'easy' and uncreative option of simply closing the forests to OHV use is counter to multi-use, is draconian in its impact to small communities and small businesses that depend on the OHV industry, exposes the USFS to litigation, and is unnecessary! (Individual, Littleton, CO - #134.91712)

We are very clean and respectful of nature. We take great pride in our ability to commute with wildlife and see the beautiful sites when we stop. We would be devastated to learn that we could no longer enjoy our time outside of the city. We do not cut down trees (could you see us with a chainsaw hooked to our backs riding down a trail), we do not go off the trails unless absolutely necessary (e.g. a fallen tree blocking the path). We are careful not to cause any kind of disturbance to the beauty we see around us. It is a time for my family to come together and enjoy life and nature and the beauty it has to offer. We (and I believe I speak for all riders) do not appreciate the Sierra Club lumping us in with destroyers of nature, such as loggers, miners, freeway builders and deforesting companies. Those who do not ride do not understand the deep respect we have for our surroundings when we are on the trails, the love we have for nature, and the appreciation we have for the experiences we take back with us. (Individual, No Address - #1176.91712)

If this...dictation to the American public is adopted, I want it written in ALL ACTIVITIES INCLUDING MOTORIZED RECREATION, INCLUDING 4 WHEEL DRIVE (JEEP TYPE) VEHICLES MUST BE ALLOWED TO CONTINUE ON ALL ROADS AND TRAILS IN THE AREAS DESIGNATED ROADLESS. (Individual, Vonore, TN - #5713.91700)

Does this initiative close down the designated OHV riding areas I've been riding in almost my entire life in Troy Meadows (Sequoia Nat. Forest) and the forest trails of Los Padres Nat. Forest coming out of the Hungry Valley SVRA area? I find it absolutely repulsive what's being done. These are virtually the only areas left open to ride in other than the desert (which is also under attack in the West Mojave Plan). (Individual, No Address - #1756.91712)

In many areas that people off-road, it has been going on for 80 years. Leave these areas open. Do not close them down. Simply designate other areas to never be able to off-road in ever. Nobody wants to off-road in Yosemite, for example. (Individual, No Address - #2513.91712)

This whole thing is bogus, especially in the area of restricting/forbidding recreational vehicles. It smacks of bureaucracy, and should have much more study by an impartial, objective committee. Recreational vehicles can be modified. With little cost, to adhere to emission standards if need be. (Individual, Auburn, WA - #6770.91710)

### **Public Concern: The final EIS should prohibit off-highway-vehicles in roadless areas.**

It is also stated in the DEIS that there is insufficient data on the impacts of ORV use on roadless forest areas on which to base a National prohibition. A science based study is not needed to determine this impact. A visual survey of the areas that have been used year after year by these vehicles will reveal the destruction they have caused to the trees, other vegetation, waters and the habitats of some wildlife. (Environmental/Preservation Organization, Pensacola, FL - #15067.91612)

### **Public Concern: The final rule should immediately ban motorized off-road vehicles from roadless areas.**

Dirt bikes and other off-road vehicles should be barred from roadless areas NOW, not addressed later. (Individual, Cedar Mountain, NC - #485.10110)

I've recently learned about the Roadless Area Draft Environmental Impact Statement for the protection of the last remaining unspoiled lands in our nation. However, I feel that this statement is flawed in the following ways: Postpones all decisions regarding off-road vehicle use. (Individual, San Rafael, CA - #872.64252)

During the last few years, the local forest, the Medicine Bow, has been transformed primarily into a tree farm and a race track for high speed snowmobiles and turf-destroying ATVs. I would like to see an oval track set up



for these machines in a sacrificial area outside the forest, and ban these machines from the forest. (Individual, Laramie, WY - #3604.91610)

As a small business owner and longtime resident of the High Sierra, I am writing to express my support for the strongest possible restrictions on off-road vehicles on our public lands. By off-road vehicles, I refer to snowmobiles, ATVs and dirt bikes, whose sole recreational purpose is for motor speed sports on these public lands; and do not mean to restrict access to public lands (other than to wilderness) on existing recreational easements by vehicle for hikers, packers, horsemen, fishermen, skiers, campers, photographers, bird watchers, bicyclists and other persons. (Individual, Markleeville, CA - #236.10100)

The primary threat to public wild lands in the 21st Century is Motorized Wreckreation. Because the preferred alternative fails to address this issue, it is itself spineless, gutless and worthless. . . (Environmental/Preservation Organization, Bend, OR - #8301.91610)

The roads already crisscross this great nation. And, there is ample opportunity to exploit motorized vehicle recreation. All-terrain-vehicles should be limited to currently existing, private land. (Individual, Belding, MI - #2886.64150)

Please...There is no such thing as an ATV path. It's just a small (for now) road.  
Ban all motorized vehicles from Roadless and Wilderness areas! (Individual, Whitefish, MT - #6435.91610)

I think there are a lot of obligations more pressing than for the government to provide [ORV users] with the number of trails they would prefer on public lands. One of the speakers actually owned a private ORV park--it would seem to me that would be the best way to provide more space for ORV's as it was mentioned at our meeting that ORV use drives off other uses--their areas of recreation become, in fact, exclusive. (Individual, Greenville, SC - #12160.91000)

#### **BAN WATERCRAFT AND POWERBOATS**

The use of mechanized off-road vehicles should be restricted to properly designated areas outside the roadless area reserves. This should include the use of personal watercraft and powerboats. (Individual, Albuquerque, NM - #10780.91600)

I currently live in Southern California. While I love the water, and boating, I do not enjoy the noise or pollution of off road vehicles, or jet skis, or snowmobiles. These must be managed and quarantined to specific areas to ensure lasting beauty and wildlife for all. (Individual, No Address - #6652.91600)

#### **Public Concern: The Forest Service should ban snowmobiles from roadless areas.**

Roadless areas should be free of road building, logging, mining and the incursion of off-road motorized vehicles, including snowmobiles. (Individual, Mill Valley, CA - #972.64150)

#### **Public Concern: The proposed rule should clearly define how snowmobiling and snowmobile trails will be effected.**

Last week I participated in a snowmobile administrators meeting in New Hampshire. Also in attendance were many Forest Service people from Washington, DC as well as Federal Highway and Fish and Wildlife people. We were assured that the roadless initiative would not affect snowmobiling and that a snowmobile trail is not a road. (Individual, La Pine, OR - #6739.42000)

Last November I attended a luncheon in Washington DC where the speakers were Jim Lyons, Assistant Secretary of Agriculture and Chief Mike Dombeck of the Forest Service. Chief Dombeck talked about

snowmobiling in the Midwest where he grew up and again stated that he did not see the roadless issue as affecting snowmobiling, and he didn't see any cause for concern. Again we would like assurance from the Deschutes that this is so. (Individual, La Pine, OR - #6739.42000)

### 6.7.3.3 Limitations on Motorized/Off-Highway Vehicle Recreation

#### **Public Concern: The Forest Service should justify its reasoning for failing to restrict off-highway vehicle use in the proposed rule.**

We are concerned about the failure to exclude roadless areas from off-road vehicles. ORV riders already have access to more than 380,000 miles of National Forest routes and yet little information is provided as to the impacts of these vehicles on roadless areas. The Forest Service dismisses concerns about ORV impacts to roadless areas stating that "...decisions of this nature are better made through local planning and collaboration processes." (DEIS p. 3-121) ORV impacts are a national problem that must be addressed at a national level. (Environmental/Preservation Organization, Plymouth, MN - #51067.91610)

After reading about your service Draft released on May 9<sup>th</sup>, I feel somewhat less threatened by the roadless initiative begun (in my opinion unlawfully) by the Clinton Administration. By not banning motorized travel entirely, it appears that perhaps someone is beginning to give some thought to the mandate of Congress. At the same time, I have to wonder whether this is not just a political move to stave off some of the criticism directed at you because of the initiative. (Individual, Bracey, VA - #2185.41100)

#### **Public Concern: The Forest Service should incorporate nationwide restrictions on off-highway vehicle use into the proposed rule or should initiate a separate rulemaking process to regulate such use.**

The Forest Service should either incorporate nationwide restrictions on OHV use within the proposed roadless area conservation rule, or expeditiously initiate a separate rulemaking proceeding to regulate the use of OHV's. (Individual, Santa Monica, CA - #16735.64150)

In my opinion, you have insufficiently addressed the problem of ATV's in roadless areas. Having just come back this afternoon from a jaunt where several young people on ATV's were leaving a terrible dust cloud and a great disturbance of the soil, I am reminded that unrestrained use of off-road vehicles seems to be looming as the next big issue regarding forest lands. You might want to get ahead of the curve by deciding that this particular use, with its large potential for disturbing the wildlife, the landscape, and the human peace and quiet, might appropriately be a subject for consideration in this proposed rule. (Individual, Camp Sherman, OR - #6122.91612)

I would hope that before the final draft is accepted, it will be revised to address the growing problem of ORV use on our public lands. (Individual, Preston, ID - #7648.91612)

The proposed rule is flawed in asserting no clear direction on the rapidly-escalating proliferation of off-road vehicle (ORV) traffic--often unplanned--into wild and roadless natural landscapes. Off-road vehicle traffic is THE activity with the "greatest likelihood of degrading desirable characteristics of inventoried roadless areas" throughout Montana and the Rocky Mountain West. Eight of the nine listed roadless characteristics are adversely affected by unplanned off-road vehicle traffic in large inventoried roadless areas. The speed of landscape transformation from remote, roadless and pristine is too rapid to wait another 8-10 years for completion of forest planning in Montana forests. (Individual, West Glacier, MT - #52497)

We [the Izaak Walton League of America] feel that the agency should establish national guidelines to assist local Forest Service officials make sound management decisions regarding when and where use of OHV should be permitted. We are not persuaded that unroaded portions of inventoried roadless areas are generally an

appropriate location for such an activity, particularly given the enumerated roadless area characteristics that the proposed rule is designed to protect. Accordingly, we urge the Forest Service to either incorporate nationwide restriction on OHV use within the proposed roadless area conservation rule, or alternatively to expeditiously initiate a separate rulemaking proceeding to regulate the use of OHVs within unroaded and roadless areas of the National Forest System. (Preservation/Organization, Saint Paul, MN - #15272.71230)

**Public Concern: The Forest Service should establish clear and permanent guidelines for the use of off-highway vehicles on public lands.**

The outcry that motorized access will be severely restricted is unfounded. Off-road users have more than enough roads on which to recreate, and have been encroaching on true wilderness areas on a regular basis. Unfortunately due to new technology, both on and off the snow, off-road vehicles now have the capacity to go farther, steeper, etc. than before and the users tend not to respect the boundaries that are in place for good reasons. Look at the high incidence of avalanche related accidents with snowmobilers and this lack of respecting logical boundaries becomes very clear. Regardless of the result of this initiative, the USFS needs to establish clear and permanent guidelines for the use of off-road vehicles on public lands. (Environmental/Preservation Organization, Seattle, WA - #958.91610)

I am writing in favor of a serious plan to restrict additional roads and to manage the roads we have. I am a long time visitor of Inyo and other Forests. I have found wide spread "abuse" of existing areas by those with SUV's. The idea of opening up more areas to them especially without proper supervision and management will be catastrophic.

On San Joaquin Ridge there are inspirational views of Mtns. Banner, Ritter and the Minarets. Not to mention the Eastern border of Yosemite. There is already a road along this ridge. Until recently that road was traveled occasionally by the 4WD vehicles. It is mostly used by hikers. In recent years mountain bikes have been added with the Mammoth Bike Park. But in the last two years with an increasing push by the visitor industry in Mammoth, there have been more SUV's.

This ridge is made of mostly fragile volcanic pebbles. The climate is extreme and exposed. The flowers that manage to grow have taken years to develop with these special high altitude conditions.

The road has no provisions for turning, parking or restrictions. As a Result I have witnessed the tire tracks of many vehicles all over the area, NOT ON THE ROADS. I have seen the drivers go up the ridge, past us hikers, never get out of their vehicles, never even open the window, turn around in a "virgin" space and go back down. What they leave is a tire "ditch" that will not be leveled for years. Not to mention the ruination of the plants, these folks never even saw.

To fix this situation all the FS has to do is to stop the vehicles below the final hill and allow them to park in a non-fragile area. For the most part they would already have seen the views from other protected areas. There is no room for a "parking lot" or turn areas on the top of the ridge.

Right now it is difficult enough to monitor what happens in the Forests. Now that the "public" has this great access, thanks to the SUV craze, tough management restrictions must be put in effect now before more destruction occurs. (Individual, Oakland, CA - #5154.91612)

**Public Concern: The management of off-road vehicles should be evaluated on a case-by-case basis.**

Off-road vehicle use may be appropriate in some cases but must be carefully evaluated on a case-by-case basis. (Individual, Edmonds, WA - #5643.91610)

I...ask that you consider removing all language regulating OHV use except in those specific instances where OHV use is shown to be a problem, and when so found to provide language allowing for temporary closures instead of outright exclusion. (Individual, Seattle, WA - #351.61300)

**Public Concern: The Forest Service should divide national forests in half with one side open to motorized vehicle use and the other closed to motorized vehicles.**

If we have to come to a compromise with the environmentalists then split the forest in half with a boundary line on a map that states motorized vehicles in this half ok and this half banned. (Individual, No Address, - #18978.63000)

**Public Concern: The Forest Service should consider a permit system to limit numbers of motor vehicles.**

Some alternatives: limit access based on acceptable impact; only so many vehicles for a given period of time. Reservations may be required for the most popular perhaps. Yes, my usage too would be limited but at least I am afforded the opportunity to enjoy it, which I would not if there were no roads at all. (Individual, No Address - #2318.60000)

I am concerned about this proposal, future proposals to come, and the current bans on some recreational activities in national forests. Let me start with saying that while I am a snowmobiler it was clear that there were problems in some of the National Forests and that something had to be done. My question is why just an outright ban? Why not the more reasonable alternative which is to limit the number per day, per week, to take care of the problem. At some level the nature of the problem becomes not only livable but viable. Then the people who wish to access these parks would simply have to apply for a permit based on some type of lottery system, similar to what many states do for hunting licenses, the technology is already available, it's not like you would have to invent the wheel! I know that many of these parks limit how many vehicles (i.e. cars) can enter or be in the parks at one time, why not the same for other types of recreational activities? (Individual, Boulder, CO - #2995.61300)

**Public Concern: The Forest Service should limit the hours during which off-road vehicles may operate during hunting season.**

I would also like to see some sort of rule passed that would limit the hours these off-road vehicles can be operated during the hunting seasons. Something on the lines of limiting their use to the hour before sunrise and the hour after sunset would go a long way toward the curtailing of the abuse these things do. With these limits, people could still use them to access their hunting areas, but the rest of us could have peace and quiet during the day. (Individual, Peetz, CO - #12932.64150)

**Public Concern: The Forest Service should require the use of lower-emission off-highway vehicles.**

The high emissions rate spewed by [off-road vehicles] must be addressed, why do we allow a vehicle with 30 times the emissions of a standard car to pollute our public lands? The technology is there to produce quieter, cleaner burning engines and the government should set requirements to ensure that the vehicles that do travel on designated off-road trails create as little impact as possible. (Environmental/Preservation Organization, Seattle, WA - #958.91610)

I would rather see use required to use quieter and/or cleaner motorcycles like 4-strokes or have tighter emissions requirements rather than an absolute reduction in access. I don't want to be limited to small OHV parks. I want to responsibly enjoy the outdoors. (Individual, Newark, CA - #7292.91700)

As an alternative to shutting motorcyclists out of these areas, I would propose something similar to what the state of California has done in the last few years, and that is restrict the access of two-stroke motorcycles to recreation in that state. They cause the vast majority of the noise and air-pollution as far as motorcycles go, and targeting only those vehicles would still allow for the enjoyment of this recreation of choice by others. (Individual, Thibodaux, LA - #6329.91712)

I agree with the environmentalists that 2 stroke engines are inherently much more polluting than modern cars. Just how much more polluting seems to be still in dispute. Also unproven is just how much this pollution degrades the environment in the affected areas. Also, there are technological ways to bring very large reductions in this pollution. These methods deserve to be investigated before the machines are completely banned. (Individual, Auburn, WA - #17820.91500)

**BY SETTING REACHABLE GOALS AND MANDATES FOR POLLUTION AND NOISE**

If you feel it is your job to protect the forests, why have you neglected it for so many years? You have gone from no management to reckless management. If you had been doing your job all these many years, you would have set reachable goals and mandates for pollution and noise, etc., manufacturers would have responded like the auto industry and, over many years, would have improved the OHV....The forests definitely need to be better managed. The problems developed over decades. Do not try to solve the problems in big gulps; you could choke to death on such a big bite. Careful, planned, progressive management, working with OHV industry and the taxpayers will eventually resolve the problems. (Individual, Hyrum, UT - #2927.71230)

Snowmobiles do not carve up the land as do ATVs. Of course, snowmobilers must be careful not to damage trees which are above the snow level. Our new 2000 year sleds are quieter than ever. We believe the manufactures can make them even quieter. It is not unreasonable to even ban after-market exhaust systems which increase noise. Noise reduction can and should be a goal--not the closing of forests to snowmobiles. As to pollution, snowmobiles are all 2-stroke engines. The manufactures can easily make 4 stroke engines for trails, but they would never have enough power to work in deep powder. Yet, there are synthetic oils and other devices which can reduce pollution. When automobiles polluted, they were not banned. Instead, the manufacturers were given mandates and deadlines to gradually improve the emissions. (Individual, Hyrum, UT - #2927.83000)

**Public Concern: The Forest Service should place more restrictions on personal watercraft, such as jet skis.**

I would also like to see more limitations put on personal watercraft (jet skis) for the sake of quietness and to avoid detrimental effects on lake ecology. Anything that can be done to enforce laws prohibiting motorized recreational vehicle usage would be greatly appreciated. (Recreational Organization, Minneapolis, MN - #10151.91650)

**Public Concern: The Forest Service should not limit use of 2-stroke watercraft engines.**

I have recently had my fishing boat banned from the lake (2-Stroke Ban on Lake Tahoe) Please do not take any more outdoor recreation away, there is not much left for me to enjoy. (Individual, No Address - #7064.91750)

**Public Concern: The Forest Service should restrict motorized vehicles to designated routes.**

Rampant off-road vehicle (ORV) abuses in designated roadless areas must be stopped. Many "ghost" roads are used by ORVs with resultant damage to soil resources, wildlife, and unnecessary loud noise. Damage to soil is

especially serious where use occurs when the soil is wet. ORV use should be restricted to designated routes where damage is and can be controlled. (Individual, Driggs, ID - #6846.91612)

According to the Draft Environmental Impact Statement on Forest Service roadless area conservation issued on May 9, 2000, off-road vehicles will not be prohibited from using existing routes in our National Forest roadless areas. That is wrong! Consider this one example of one National Forest that I live near. the Chippewa which has 675,000 acres of forest land but has only 77 acres in 3 separate parcels that are roadless. Are you suggesting that the proliferation in recent years of off-highway vehicles can run roughshod on these abandoned forest roads?? That is an irresponsible avoidance of a very destructive activity. In many cases this activity is far worse than the original intent of the road for hauling logs! I'm not suggesting there should not be trails provided for off-highway vehicles. There should be designated and monitored trails where monies from these activities would be derived from. (Individual, Bemidji, MN - #8324.91612)

Some parts of the forest should be managed for motorized recreation--OHVs, snowmobiles, and downhill skiing--with recreation areas and trails paid for by users through the permit systems that are in place. This type of recreation should not be banned from any of the National Forests, but should be restricted to well-marked, designated areas. (Individual, Missoula, MT - #6992.91710)

**Public Concern: Off-road vehicles should be allowed only on designated and signed official trails.**

One of the most serious threats to the national forests comes from off-road-vehicles. The use of these vehicles, especially in the open woodlands of some national forests in particular, such as the Humboldt-Toiyabe, is creating trails at an alarming rate. In many cases such trails are as damaging to forest resources as are roads. Once established and used over years leading up to plan revisions, the probability exists for having such destructive trails cemented into transportation plans during the plan revision process. This is because inordinate pressure can be brought to bear by those who have become accustomed to using these trails. There needs to be national direction to allow off-road-vehicle use only on designated and signed trails with roadless areas in the interim leading to plan revision, even if it means immediate revision of a forest travel plan. (Individual, Bolder City, NV - #1039.64150)

**Public Concern: The Forest Service should restrict off-road vehicles to established roads only and ban them from trails.**

The ORV issue has to be addressed on Forest Service roads only, not trails....Montana State lands and BLM restrict ORVs to established roads, so should the Forest Service. (Individual, Whitefish, MT - #4917.91612)

**Public Concern: The Forest Service should adopt a "closed unless signed open" policy effective as soon as possible.**

We need to implement a national rule that closes national forest lands to off road vehicle use except where routes are signed open. This is not a suggestion for increased restrictions: rather it is intended to make it easier to keep OHV's where they are allowed. Making "closed unless signed open" a policy or guideline is not enough--it should be a rule, made effective as soon as possible. Without it the roadless area rule will only be partly effective in meeting its stated objectives. The forests will continue to have inadequate control over use of motor vehicles off designated routes. Roads will continue to develop in many areas, as ATV's get bigger and go farther into the backcountry. As their pioneered routes become established two-tracks they invite larger vehicles such as jeeps to try the route, then full sized trucks. We've seen this in many places in areas managed for non-motorized uses (including wilderness).

The Forest Service has tried to keep travel management signs in place, but many of the closure signs get torn down as soon as they are installed. In the meanwhile, trails are turning into roads and cross-country vehicle use is damaging to vegetation and soils and displacing traditional non-motorized use.

The solution, if we really want to keep the roadless areas roadless, is to put in place a national standard that says forests are closed to off road motor vehicles except where signed open or shown open on a travel map. This will reduce the destruction of signs (as well as the resulting waste of tax dollars needed to continually replace them). It will allow for the individual forests to continue to manage for motorized trail uses, but in a more effective way. I hope that this will be seriously considered. (Individual, Jackson, WY - #6870.91612)

Let us put up signs designating areas that are open for motorized use, so motorized users of the forest will understand where they can drive and that the rest of the forest is off-limits for driving. (Individual, Basin, MT - #3645.91100)

**Public Concern: The Forest Service should not develop or implement a nationwide policy of “Closed Unless Posted Open” for off-highway vehicles.**

It has been most disturbing for me to find out that you may be developing a nation-wide policy of “CLOSED UNLESS POSTED OPEN” for off-highway recreation on National Forest lands. I understand that this policy, if implemented, would affect not only motorized recreation access but mountain bikes and equestrians as well. My family and I enjoy backcountry recreation in our National Forests. We use primitive roads and trails and are adamantly opposed to a “CLOSED UNLESS POSTED OPEN” national policy. (Individual, Farson, WY - #15241.91700)

#### 6.7.3.4 Maintenance of Motorized/Off-Highway Vehicle Recreation Trails and Areas

**Public Concern: The Forest Service should recognize and encourage more volunteer work by the off-highway vehicle community in road and trail maintenance.**

I am extremely disappointed by the refusal of the Forest Service to recognize the countless hours of volunteer time I, and others like me, have spent to maintain OHV sites in our area. Continued failure to recognize the many contributions of the OHV community will only serve to punish those who are actively working toward a solution to a symbiotic relationship between recreation and conservation. (Individual, Canon City, CO - #1103.44020)

As for us ORV (motorized) enthusiasts, many of us voluntarily maintain our trails to protect against erosion and water pollution, and I think we’re successful. (Individual, Asheville, NC - #832.44020)

We are told that there is a backlog on road maintenance throughout the Forest Service. We have been trying to help by asking for use of fire lanes and roads in the forest to ride on with OHVs. In return we will give our time to clean and maintain roads two to three times a year. (Recreational Organization, Tell City, IN - #1031.44020)

The Montana Trail Vehicle Riders Association and other local OHV groups provide all maintenance of the erosion-avoiding trail system in the Little Belt and Highwood Mountains. Our machines were quiet and four stroke machines will soon predominate. We know to wash our machines regularly to avoid spreading noxious weeds, and we actively participate in weed eradication activities. (Individual, Great Falls, MT - #2810.44020)

**Public Concern: The Forest Service should require that off-highway vehicle groups adopt and maintain trails to standard to prevent closure.**

Make OHV and other recreational use a higher priority in the Roadless DEIS, with language that clearly states the goal of preserving traditional usage and access--simply no new roads (without compelling reasons, but allowing them under forest management justification), but clearly allowing and even encouraging (where justified by demand) carefully maintained trails. These OHV trails and four-wheel-drive trails could be required to be sponsored by private groups that use them, with clear measurable standards of maintenance that address water quality, erosion, and other impacts, while preserving recreational values. If no one cares enough to sponsor the road or trail, then close it after an appropriate probationary period. (Individual, Littleton, CO - #1219.61300)

**Public Concern: The Forest Service should not maintain roads because recreational users enjoy the challenges they provide.**

We do not need nor want any federal nor state sponsored road maintenance nor building of new roads. We like the existing roads (trails, byways, passages, and whatever else you may call them) the way they are, in their poorly maintained state. We leave them much the same as they were, save for a few rocks moved and some tire tracks. Tire tracks in sand of course disappear with the next wind. Each year it's interesting to see the effects of the rain, wind and weather on these roads. They are different every year. These roads date back over a hundred years, and in some cases, date back to before California became a state. These roads carry a reasonably small, but important amount of traffic. (Individual, Gardena, CA - #1755.71300)

There should be more roads and especially trails opened for recreational use. The roads and trails don't need to be maintained, they just need to be properly marked. (Individual No Address - #5673.91710)

#### 6.7.4 Non-motorized Activities

Many respondents feel mechanized recreation should be restricted or banned in national forests. These individuals believe that mechanized uses such as cycling harm the environment. "I've seen the vegetation and trails damaged before my eyes," notes one individual. One citizen, particularly concerned with old growth, advocates the prohibition of all mechanized use in old growth forests. On the other side, advocates for mechanized use claim that mechanized "activities such as mountain biking are quiet" and should be permitted, along with hiking and horseback riding. Still others suggest that a compromise is needed between these two sides. "Perhaps some areas should be off-limits to mountain bikes, but most trails should remain open to them," notes one individual.

Some voice the opinion that the Forest Service should consider protecting national forest lands from all but human powered recreation activity, without specifying any particular modes of travel. Others claim that roadless areas should be restricted to foot traffic only. These members note that many citizens "need exercise" and that "by providing easy access to our forest they might consider walking to view the scenery."

Some members of the public believe that equestrian use should be restricted in roadless areas. They point out that "continuous use by pack-trains of horses is no better than use by trail bikes" at reducing environmental damage to trails. "Horse trails should be found only in areas which have the ability to sustain this type of heavy traffic," proclaims one proponent.



On the other hand, numerous individuals insist equestrian use should be allowed in roadless areas. These respondents feel that equestrian access has steadily declined and worry that the proposed rule will further reduce access. Many affirm that equestrians are responsible citizens who “help develop trails,” “do not seek to damage the forest floor by exploring off of marked trails,” and “pack out what they pack in.”

One supporter of equestrian use maintains the Forest Service should provide adequate parking space for horse trailers at trailheads. This person believes that inventoried roadless areas once logged and now too steep for modern day logging equipments provide some of the “most scenic views” if accessible to horse trailers. A few dog sledding enthusiasts request that their sport be specifically allowed in roadless areas. Some, however, feel that any human entry of any sort is detrimental, and therefore roadless areas should be entirely restricted from human entry; or at least, significant restrictions should be placed on recreation in especially environmentally sensitive areas.

**Public Concern: Mechanized recreation should be restricted or banned in national forests.**

I’ve watched the cyclist going by on hiking trails and seen the vegetation and trails damaged before my eyes. (Individual, Longmont, CO - #2098.91620)

I believe that the absence of mechanical vehicles in the forests makes for a more rewarding experience for people who share the parts of the country that belong to us all. (Individual, No Address - #1287.91620)

Other mechanized use of old growth forest should be prohibited. (Individual, Cottage Grove, OR - #1909.91620)

**Public Concern: The Forest Service should allow mechanized activities in roadless areas.**

Trails should be open to mountain biking, (which is banned in Wilderness). Mountain biking is a quiet and relatively low impact form of recreation that should be a recreational activity that’s promoted in our roadless areas in the National Forests, along with hiking and horseback riding. (Individual, Selah, WA - #5773.91700)

I believe much or most of the roadless areas should remain accessible to mountain bikes. We need to find a compromise--perhaps some areas should be off-limits to mountain bikes, but most trails should remain open to them. (Individual, Auburn, CA - #1960.91750)

**Public Concern: The Forest Service should consider protecting national forest lands from all but human powered recreation activity.**

This letter is to express my strong desire that the 2,500 miles of Forest Service trail and more than 2 million acres of unprotected roadless areas in National Forests in Washington State be protected from all but human powered recreational activity. I support the same protection for all National Forest lands. (Individual, Seattle, WA - #9708.10100)

Our citizens and the human population need to start making sacrifices to keep our earth healthy and, should we deserve, continue as a species. If you value wilderness so much for your solitude, recreation, exercise, you

should be willing to expend energy getting there and not destroy it in the process. (Individual, Crested Butte, CO - #7564.90240)

**Public Concern: Roadless areas should be restricted to foot traffic only.**

I am writing to ask you all to work for a plan to keep what is left of our national forests roadless. That means also no bike trails or ORVs or anything except feet. (Individual, Nevada City, CA - #1015.10100)

Existing trails should be reserved for foot traffic in sensitive areas and exclude other forms of access, if in fact, access of any type should be allowed. (Individual, No Address - #482.91600)

**FOR PERSONAL HEALTH AND ENVIRONMENTAL BENEFITS**

Let's leave nature alone for once and make people get out of their cars and walk! And we all know America has gotten fat so the walking will do us all good. (Individual, No Address - #1762.91610)

Besides, Americans need exercise and by not providing easy access to our forests they might consider walking to view the scenery. (Individual, Columbia, IL - #6227.90200)

**Public Concern: Equestrian use should be restricted in roadless areas.**

I agree with the concept of preserving the resource, but if access is to be restricted...do it equitably, allow only human foot traffic. Don't try to tell me that horse traffic doesn't help erode trails. Continuous use by pack-trains of horses is no better than use by trail bikes. I'm not suggesting that they be given access, I just don't think that there is any good argument for allowing access to horses. (Individual, No Address - #160.91630)

Horse trails should be found only in areas which have the ability to sustain this type of heavy traffic (and having horses for eighteen years I know the damage they can do especially on moist soil). (Individual, No Address - #482.91630)

**Public Concern: Horses should be allowed in roadless areas.**

Finally, after years of working toward it, I became a horse owner. Now finding places to ride has become a very frustrating experience. I am very concerned about continued equestrian access to the areas in question. (Individual, San Diego, CA - #97.91730)

We think the revised forest plans should recognize that stock users desire a full range of locally available backcountry recreational experiences. Local land managers must have the means and responsibility to use roadless, non-wilderness lands to maintain and enhance these experiences. (Business/Business Association, Lander, WY - #4567.91730)

I would like to suggest that the "Rule" include mention of equestrian/stock use as one of the recreational activities taking place within roadless areas. (Individual, Peoa, UT - #6279.91730)

...I feel that you have overlooked a user group in your listing of recreational activities that would have access to "roadless" forestland. The horse, used as saddle horse or packhorse was not listed among the "hiking, camping, picnicking, hunting and fishing" activities in your recreational uses. I hope that this is just a huge oversight and will be included in your final policy. (Recreational Organization, Knoxville, TN - #6914.91730)

I live in Riceville, TN and would like to see horse trails developed in the Cherokee National Forest which is very close to me. Since Tennessee is one of the leading states in horse ownership, it seems reasonable to me that we would have a voice in the development of these areas and the multiple-use concept should definitely

include horseback riders. Finally, I heard no one mention horse trails last night and that concerns me deeply. I can promise you that the horse people will support financially and physically to help develop trails if given the opportunity. I am a member of the Blue Ridge Trail Rider Club which has approximately 85 members whose membership includes small children up to the oldest member who is age 74. We will become more active and verbal in the future along with others who want to see future development INCLUDE, NOT EXCLUDE HORSES. (Individual, Riceville, TN - #6949.91730)

While I certainly can appreciate that damage can occur through irresponsible use of trails, I would offer the suggestion that the groups to which I belong (Arkansas Trail Riders Association and the Arkansas Chapter of the Missouri Foxtrotter) both encourage members to 'pack out what they pack in' and most of my friends dismount and retrieve trash left by others at every opportunity. I assure you that we are responsible individuals, who supervise others closely, including minors, that accompany us on horseback rides. We also observe marked trails and do not seek to damage the forest floor by 'exploring' off of marked trails. We follow and communicate Forest Service guidelines regarding picket-lines for horses and other 'forest care' procedures. (Individual, Beebe, AR - #7561.91730)

After having recently learned of the intent to change policy for National Forest lands regarding a 'closed unless posted open status,' please allow me a few moments to express the concerns of responsible horsepeople who frequently utilize these trails. These trails provide a clean, family-oriented environment in which friends can share an outdoor experience. To reduce the availability of access to equestrian activities is counterproductive to fostering a healthy, drug-free environment that friends and family can enjoy together. (Individual, Beebe, AR - #7561.91730)

### **Public Concern: The Forest Service should provide adequate parking space for horse trailers at trailheads.**

The land that has been inventoried as "roadless" in the Cherokee, Pisgah, Daniel Boone, and Nantahala National Forests has been logged at least once at one time or other. Most of the land is generally too steep to harvest timber with modern mechanical equipment efficiently. Even logging the old-fashioned way with draft horses and mules would be costly. Some may even consider the land "trash" land--only good for recreational purposes. This land creates some scenic views for trail riders. However, we still need to have vehicular access to areas where we can park our horse trailers. (Recreational Organization, Knoxville, TN - #6914.71300)

If the roadless initiative makes it impossible to trailer a horse to a remote trailhead, I cannot be in favor of it. (Individual, No Address #6996.10212)

### **Public Concern: The Forest Service should permit sled dog training, sledding, and racing in roadless areas.**

I am against this Roadless Initiative because I am a sled dog owner and I am concerned that vague language within these wilderness proposals may end up limiting or eliminating my access to the National Forests and Parks for the purpose of training, sledding and racing with sled dogs. Dogsledding has historical significance as both a sport and also as transportation, prior to motorized vehicles in this country and around the world, and we feel that to preserve this sport, we need access to our forests and parks.

This past October, my husband and I moved to New Hampshire specifically because of the extensive trail access through the rail trail system, conservation land, logging roads, snowmobile trails and other private/corporately owned land such as that owned by the International Paper Company. (Individual, Sandown, NH - #13623.91750)

**Public Concern: The Forest Service should considering restricting all human entry to roadless areas.**

But I feel if it has to pass, it should eliminate ALL people and travel, which includes hikers, and horse-back riding. They can do just as much damage to terrain and disturb wildlife as anything else if not more, and what good would it be doing for the grizzlies if “some” forms of activity are still allowed? (Individual, Belgrade, MT - #7523.91600)

I realize that use of these lands will have a detrimental effect on them. I would suggest that, rather than excluding certain categories of access to the lands, you limit environmental impacts by routine closure of the lands to ALL. (Individual, Ann Arbor, MI - #9696.64150)

**Public Concern: The Forest Service should protect ecologically sensitive areas from all damaging recreational activities.**

Protect ecologic and sensitive nature areas (there are several of these in the Shawnee National Forest in southern Illinois) from horse trails, ORVs, and snowmobiles. These rare and special nature preserve areas should not be open to activities that cause excessive trail damage. (Individual, Naperville, IL - #204.64422)

Yes! ROADLESS & no excess horse & ATV trails. They are tearing up our natural areas in the Shawnee. (Individual, Columbia, IL - #6227.91600)

### 6.7.5 Recreation Capacity, User Conflicts, and Relative Effects of Activities

Clearly, many recreational users of public lands are concerned with the effects of the proposed rule on various recreational activities and modes of travel. The Final EIS should reanalyze the conclusion that the rule will have a detrimental effect on recreation, some feel. “The ‘detrimental’ impact on recreation of protecting roadless areas is at best speculative; it cannot accurately be described as ‘likely,’” asserts one organization. Another individual asserts the analysis on the Tongass is “full of holes,” and dispersed recreation “can’t possibly make use of all the acres” available. Many individual users, especially non-motorized, echo this sentiment, feeling that the rule will have little impact on their activities.

Motorized recreationists strongly dispute this contention, however (see section 6.7.3). One individual requests that the Forest Service support its claim that roadless designations will benefit recreation. In addition, quite a few individuals and public officials question the adequacy of the effects analysis for recreation. They request that the Forest Service undertake more studies and that the Final EIS present more specific data. Suggestions from the public include: a formal study to determine who is actually using the national forests; a graph illustrating the increasing demand for dispersed recreation against the decreasing supply of available land for recreation; presentation of the percentage of usage for each class in the Recreation Opportunity Spectrum; and disclosure of dispersed recreation data. One group suggests that the Interdisciplinary Team consider addressing the effects of the proposed rule on particular subcategories of the Recreation Opportunity Spectrum. Another suggests that recreational use of public lands should be considered separately from commercial uses.

Numerous citizens are concerned that the Forest Service has not fully taken into consideration demographic trends in the United States. They feel the agency should consider the population growth trends and implications for recreation demand levels. A great many users fear that the proposed rule will result in a large recreation land base for a very small segment of the population. Many users, especially motorized recreationists, fear that their recreational opportunities will be severely curtailed.

On the contrary, many non-motorized users of National Forest System lands insist that it is their opportunity for quiet recreation that is being severely limited by the uncontrolled proliferation of motorized toys across most public lands. According to these users, the Forest Service should rightly protect roadless areas for the benefit of dispersed non-motorized backcountry recreationists both because there is ample opportunity for motorized use elsewhere, and because it detracts from the backcountry experience sought by many. “The national forests and other federal public lands offer the best opportunities for dispersed recreation because they have the land base. However, dispersed backcountry recreation is one of the most endangered opportunities offered by the Forest Service, because of roading and the creeping intrusion of incompatible uses,” asserts one individual. Others note that motor vehicles dominate the rest of the country, and request that the Forest Service protect the last significant land areas that still offer a chance to escape them.

Quite the opposite, insist motorized users. “All visitors, not just those who travel by foot or horse, deserve a high-quality primitive, backcountry experience! Are not motorized and mechanized users entitled to solitude, as well? Perhaps roads in some of the existing Wilderness Study Areas should be re-opened to reduce motorized concentration and to enhance the quality of the majority of visitors’ own wilderness experiences,” says one motorized recreation enthusiast. The Forest Service should address the issue of crowding of motorized users in National Forest System lands, these users feel. Still others think this is an impossible task for the agency, because motorized access is inherently incompatible with the very qualities users want to experience.

Given the apparent increase in conflicts between different user groups, individuals of all persuasions request that the Forest Service develop solutions to address this vexing problem. Some feel that the Forest Service should facilitate and encourage the use of less utilized roadless resources to spread users out over greater areas. Others fear that displaced usage and reduction of available areas open to motorized use will cause damage to those roadless areas that remain open to certain uses, or to other forest system lands onto which use will be displaced.

Other recreational users question just how much environmental damage their activities cause, and often they compare the relative effects of various uses of forest resources to support their contention that their activities are relatively benign. For instance, some feel that foot traffic is more disturbing to wildlife than motorized traffic, while others believe motorized traffic causes greater stress to animals. Still others submit that natural phenomena cause more environmental damage than human recreational or commercial activities, so restricting human activities will not solve national environmental problems. Some individuals and recreational organizations, overwhelmed by a recent deluge of federal agency planning

efforts, request that the Final EIS include an analysis of the cumulative effects of these numerous concurrent national and regional planning processes on recreation, motorized recreation in particular. The Forest Service should develop additional alternatives to ensure recreation management is carried out in a manner consistent with all of these policies, one individual submits.

**Public Concern: The final EIS should re-analyze the conclusion that the rule will have a detrimental effect on recreation.**

The Roadless DEIS fails to identify any “major (recreation) developments that would require short segments of roads,” or to note whether those short road segments would need to traverse roadless areas. (The ban on new roads in roadless areas is not a ban on new roads altogether in developed portions for a National Forest.) Finally, there is no discussion of how, if roadless area protections did contain recreational development on National Forest land, the recreational demand might be met by development on the extensive non-federal land in Southeast Alaska. The “detrimental” impact on recreation of protecting roadless areas is at best speculative; it cannot accurately be described as “likely.” (Environmental/Preservation Organization, Washington, DC - #52235.91000)

**ALTERNATIVE T1**

As far as the Tongass is concerned, the analysis done in the EIS dealing with whether the Tongass should be excluded or not is full of holes. In the employment section, they say the T1 would have a decline in dispersed recreation. There is so much unroaded area now that the dispersed recreation that takes place can’t possibly make use of all the acres. (Individual, Ketchikan, AK - #23864.93100)

**Public Concern: The Forest Service should provide data to support the claim that roadless designations will benefit recreation.**

There is a disturbing and pervasive bias in the agency’s analysis in favor of the preferred alternative. Claims of recreational benefit are made for the massive roadless designation proposed but no data appear on the current recreational use of wilderness and current roadless areas--especially compared with roaded portions of the National Forests. Further a number of studies exist which show that most recreation, including dispersed recreation, takes place in proximity to roads. Yet, such data are curiously absent from the draft EIS. (Individual, Washington, DC - #18172.91700)

**Public Concern: The Forest Service should undertake a formal study to determine who is actually using the national forests.**

Before a new policy is thrown together and approved, a formal study should be done on who is actually using our national forests. A policy should be based on benefiting the taxpayers that are actually visiting the national forests! (Individual, Pinon Hills, CA - #1489.90010)

**Public Concern: The Forest Service should display a graph illustrating the increasing demand for dispersed recreation against the decreasing supply of available land for recreation.**

Page 3-122, Alternative 1, second paragraph--This paragraph states that the demand for dispersed recreation is increasing in an environment that is decreasing. This is a supply and demand question. The supply

(environment) is decreasing by only one half of one percent per year. On Page 3-117 it states that “A small segment (approximately 3 million acres) of the inventoried roadless areas have become developed with classified roads, recreation sites, and other constructed features causing a shift to the more developed end of the spectrum.” The reason can be attributed to the statement made on Page 3-9 that says “The demand for high quality recreation experiences on public lands will continue to rise across a broad range of activities. These activities include motorized use such as off-highway vehicles and snowmobiles, and non-motorized uses....” In addition, on Page S-37, it states that the “Demand for dispersed, developed, and road dependent recreation is increasing.” We know that the supply is declining slowly. At what rate is the demand increasing? These two factors need to be displayed in a graphical illustration to determine the trends of each.

Relief: The Forest Service must clarify this section in order to provide factual information and eliminate inconsistencies. Also, what is the impact of supply and demand on local communities who depend on a diversity of recreation activities? (County Elected Officials, Worland, WY - #16185.91000)

**Public Concern: The final rule should quantify the usage for each class in the Recreation Opportunity Spectrum.**

The Recreation Opportunity Spectrum’s settings, activities, and opportunities represent a continuum that is divided into six classes: primitive, semi-primitive non-motorized, roaded natural, rural, and urban. Lets see the percent of use in each category for each American Group. (Environmental/Preservation Organization, No Address - #43585.91000)

While you define “Recreation Opportunity Spectrum,” you fail to quantify recreation uses. It is my experience that by far the greatest numbers of recreation visits revolve around access by vehicle and take place within 1/4 mile of a road. (Individual, East Boothbay, ME - #8887.91000)

**Public Concern: The Forest Service should disclose dispersed recreation data.**

Page 3-120, third paragraph--This paragraph makes a statement that “Recreation use data has never been collected specifically for inventoried roadless and other unroaded areas.” The Forest Service has been collecting dispersed recreation data for decades--where are the references to the Recreation Information Management (RIM) report prepared annually? The conclusion can be drawn that without the ability to assess environmental consequences based on use, then this decision must be delegated to local agency officials and local governments who have the information.

Relief: The Forest Service must either find and disclose this information or delegate the decision to local officials who have the information. (County Elected Officials, Worland, WY - #16185.90010)

**Public Concern: The Interdisciplinary Team should consider addressing the effects of the proposed rule on subcategories of the Recreation Opportunity Spectrum.**

There are additional categories and subcategories under the ROS classification that may be appropriate for consideration during the review of roadless and unroaded areas. (Environmental/Preservation Organization, Asheville, NC - #43412.91200)

**Public Concern: Recreational use of public lands should be considered separately from commercial uses in the proposed rule.**

Recreational use of public lands, especially in areas dominated by such use, needs to be addressed separately from commercial uses. (Individual, Steamboat Springs, CO - #8704.91600)

**Public Concern: The Forest Service should consider the population growth trends and implications for recreation demand levels.**

WA. state population predictions are for doubling in the next 50 years. Hopefully government land use planners will give population predictions very serious consideration for needs not just for fifty years but for many years ahead. (Individual, Cashmere, WA - #13478.71220)

There are six billion people on the planet and our own country's population is expanding at an alarming rate. Open space is a rare thing in this day and age and even more rare is the kind of undeveloped land that can support wildlife. People need these areas as well in order to escape from the increasing pressure of urban existence. I want these lands to be given real protection, not just lip service. (Individual, Cody, WY - #7591.71220)

In the "Overview of proposals," the agency asserts: "The outlook is for recreational road use to grow by an additional 64% by the year 2045." What study was used to come up with that data? What gives the agency the idea that the increase in use over the same length of time won't be similar? (Wise Use or Land Rights Organization, Salt Lake City, UT - #16190.90010)

**Public Concern: The Forest Service should address whether the proposed rule will result in a large recreation land base for a very small segment of the population.**

Comment: General--Overall, the entire recreation section needs to be shored up by providing information and data on how many people used roaded areas, unroaded areas, and wilderness areas. Only then can the balance of supply and demand be determined. The assumption on Page 3-125, last paragraph, is that the balance of roaded and unroaded should be 49% and 51% respectively. This is very speculative and a conclusion that has no basis other than it supports the "Proposed Action." The question that must be answered is, "will this proportion create a large recreation land base for a very small segment of the population?" And should Beaverhead County have to provide a disproportionate amount of this land base? (County Elected Officials, Dillon, MT - #17297.91200)

The Forest Service should address the claimed potential benefits of the proposed rule by answering the following questions: Does the general public actually want more dispersed recreation versus developed recreation? (Individual, Kingsport, TN - #8500.91000)

With the increased pressure that the Forest Service is receiving from visitors it is obvious the Proposed Roadless Conservation Rule is anti-recreation. The majority of forest visitors (about 98%) depend on forest system roads for their recreation. Only 2% of visitors frequent the 37% Wilderness Areas! (Recreational Organization, No Address - #9089.91000)

**Public Concern: The Forest Service should protect roadless areas for the benefit of dispersed non-motorized backcountry recreationists.**

Roadless areas provide a much-needed intermediate setting between classified wilderness and roaded lands. The national forests and other federal public lands offer the best opportunities for dispersed recreation because they have the land base. However, dispersed backcountry recreation is one of the most endangered opportunities offered by the Forest Service, because of roading and the creeping intrusion of incompatible uses. (Individual, Jackson, WY - #6870.10100)

Ample acreage must be set aside for non-motorized recreation including backpacking, hiking, and bird watching. These should be considered as important multiple uses, for which we desperately need permanent protection of roadless areas. (Individual, Provo, UT - #8058.91610)



The Forest Service has many miles of roads throughout their lands, and it is getting harder and harder for backpackers and hikers to get away from motorized traffic and civilization. (Individual, Spokane, WA - #8347.71300)

So, for whom are you going to plan roadless area uses: the people with machines, or the people who walk? Isn't there already a plethora of roads--unmaintained and otherwise--and motorized trails near urban and rural population centers? (Individual, Albany, OR - #2532.91600)

I'm out backpacking and hiking/camping a lot in the Kaibab Forest of northern Arizona, and [in] many of areas of the Dixie National Forest and you can hear the ORV's from miles and miles away and unfortunately--where they go it seems to leave lots of evidence of their travels with them; beer and pop cans, misc. trash, targets for shooting practice. Not too mention just the constant roar of their motors running non-stop. (Individual, No Address - #1182.91500)

I am a recent Appalachian Trail thru-hiker and grew up within walking distance of the Hoosier National Forest; people who can haul 3 cases of beer on their ATV create disturbance for me, but also tend to overly impact their campsites, "burn" their cans, compact the soil, etc. Please help to prevent or slow the destruction of these lands. (Individual, Arcata, CA - #1236.91500)

Backpackers and Hikers are very caring of the environment, yet the areas that can be explored and enjoyed by "people without machines" is shrinking. (Individual, No Address - #1317.91500)

For much of its length, the Appalachian Trail is managed to provide a removed backcountry hiking experience. The presence of roads can compromise that experience in several ways. The visual impact of roads on the landscape is a major concern of ATC, as is the audible impact of vehicles using roads that are in close proximity to the Trail. An even greater concern is the access provided by nearby roads. This had led to illegal use of the trail by off-road vehicles, or resulting in heavy use and resource degradation at Trail shelters and other destinations (such as ponds). Enforcement is difficult, and the problem is exacerbated where roads cross or are in the vicinity of the Trail. Finally, roads can fragment wildlife habitat, serve as corridors for invasion of natural habitats by exotic species, and degrade water quality. These impacts can diminish the hiking experience that ATC and its management partners seek to provide. (Recreational Organization, Harper's Ferry, WV - #53414.71300)

### **Public Concern: The Forest Service should address the issue of crowding of motorized users on National Forest System lands.**

All visitors, not just those who travel by foot or horse, deserve a high-quality primitive, backcountry experience! Are not motorized and mechanized users entitled to solitude, as well? Perhaps roads in some of the existing Wilderness Study Areas should be re-opened to reduce motorized concentration and to enhance the quality of the majority of visitors' own wilderness experiences. (Individual, Edgewood, NM - #50250.91710)

An increased number of users have resulted in a decline in the 'outdoor' experience. Of course the population in the U.S. has increased throughout this time but no new National Forests have been added since that time. (Individual, Kenyon, MN - #1057.91500)

I would like to see more riding trails opened. If the bill passes, it would put a large number of riders in a very small area. This would have devastating effects on the environment. If there are no reconstruction efforts, the existing trails will deteriorate [to] the point that they are unusable. (Individual, London, KY - #152.91500)

The practice of closing an area this large (almost the entire state of Wyoming) is a bad idea because it will only concentrate these users in the remaining areas thus causing problems there. We are seeing this problem on our lakes where personal watercraft users are concentrated in one area, causing more accidents. (Individual, No Address - #1539.91500)

The mileage already devoted to off-highway vehicles is certainly adequate. If these roads are considered inadequate, the people who use them must recognize that the problem is the fact there are too many people in this country. To stabilize and reverse this number is what will cure overuse of our common land. (Individual, Forest, VA - #1716.91500)

**Public Concern: The Forest Service should address the fact that motorized access is inherently incompatible with the very qualities users want to experience.**

Everyone wants access to wilderness even though that access, at some point, renders wilderness exactly the opposite of what we want. Most of the clamor for additional road construction and other development comes from folks who want to enter wilderness on motorized conveyances which, simply stated, are not compatible with the concept of wilderness. (Individual, Freeport, IL - #5245.90240)

**Public Concern: The Forest Service should address the increasing conflicts between types of recreational users.**

Recently in the past couple of years I have been assaulted and provoked by cross country skiers! On several outings I have had ski poles swung or thrown as I slowed down to pass a skier, after these events I always stop and ask why? And maybe try to show them that not all snowmobilers are reckless. But they seem to always argue that I am riding in a closed area and should evacuate! Even after pulling out a trail map that details the closures they will not look at it. The skiers constantly park to block marked snow-mo crossings. (Individual, No Address - #7064.91500)

As someone who runs sled dogs in National Forests in the west, I am completely satisfied with the trails we have already. I just wish we could ban snowmobilers on some of them. (Individual, Coalville, UT - #5235.91500)

I was in Missouri State hiking before hunting season and a hunter on a 4 wheeler came up with his guns and really scared us. We were not sure he would react to us in a friendly manner. Happily he did, but it is still scary meeting up with someone with a gun on a 4 wheeler. (Individual, Ballwin, MO - #5365.91500)

My neighbor recently camped with his 2 young boys in the national forest. They were awake at night and disrupted in the day from off road vehicles racing around the forest. There was gun fire (including automatic) for more than an hour in the evening. I like to camp too, but not under those conditions !! (Individual, Boulder, CO - #5816.91500)

The original goal of a roadless area policy was to set aside a portion of forest lands to be used differently than current uses which include logging and motorized vehicles. I and my family have camped and participated in the Passport in Time programs of the Forest Service and enjoyed both. We have not enjoyed the times when it seemed we were in an ORV park. They have, in fact, been extremely distressing, causing us to move camp and divert our hikes to avoid the dirt and noise. By not excluding motorized vehicles there will be no place to go for the hikers and those who wish to speak in a normal tone of voice. Where can people go who do not have loud machines? There should be some place [for] those of us who want to enjoy the forest because it is a forest. We used to say that your freedom ended where mine began. Why should some citizens have the freedom to destroy my peace, anywhere, anytime? I believe we can share the forest only if some areas are set aside for non-motorized activities. My use of the forest is restricted by motorized vehicles. It seems fair that their use of the forest be restricted as well so that we can both enjoy the forests, just different parts of them. (Individual, Spokane, WA - #3527.91500)

I am a frequent user of National Forests as a backpacker, and would add that contrary to their spin, use by industry and especially by off-road enthusiasts is not, repeat NOT compatible with backpacking, rock climbing, birdwatching, or for the animals' and land formations' existence. (Individual, Arcata, CA - #1236.91500)

Low impact activities should be allowed, such as hiking, fishing, and hunting, but should be monitored for overall impact. ATVs should not be allowed. These are not compatible with any natural area that I know of. (Individual, Talking Rock, GA - #800.91600)

We don't need nor should we want more areas for 4-wheeling, snowmobiling and the rest of motorized sports. For years we have enjoyed going to Yellowstone to snowmobile and have respected the laws of the Park. I am all for not doing that any longer if it means preserving the beautiful parks ... (Individual, Anaconda, MT - #859.91610)

**Public Concern: The Forest Service should facilitate the use of less utilized roadless resources.**

Many of our roadless/wilderness areas are so popular that the resources are being damaged from overuse. One way to alleviate this problem is to facilitate the use of less utilized roadless resources. An example here in Idaho is the Sawtooth National Recreation Area, where some roadless sections receive heavy summertime use. To the east of the SNRA there are extensive roadless NF lands in the Lost River and Lemhi Mountains. However these less visited areas cannot support increased recreation use due to the dominance of livestock grazing and the poor condition of access roads (to trailheads). (Individual, Boise, ID - #380.64150)

Alternatives 2-4 will result in significantly increased recreational use of smaller and smaller areas which will result in degradation of both the recreational experience and of the environment in the areas accessed. This is briefly discussed in the DEIS but treated as of no consequence. There will be serious negative impacts which need to be recognized and mitigated. (Individual, Markleeville, CA - #13284.91500)

**Public Concern: The Forest Service should develop a plan to accommodate displaced off-highway vehicle users.**

The OHV recreation in both roadless and unroaded areas will be subjected to so many conditions that few opportunities will remain. There is no plan to accommodate the displaced users. (Individual, Thibodaux, LA - #13337.10212)

**Public Concern: The Draft EIS should include an evaluation of the impact of displaced usage on all National Forest System lands.**

I urgently stress that the impact to ALL land values and ALL forest lands, including recreational and economic values as well as environmental values, be considered in the DEIS, not just the preservation of a few areas. To not consider increased (displaced) usage in the remaining forest lands would be environmentally irresponsible. (Individual, Littleton, CO - #134.63000)

Require that the impact on the entire forest--and even adjacent forests--caused by displaced recreational usage be a mandatory consideration in designating roadless areas and management strategies. As OHV lands are closed, the displacement of users causes increased severity of impact on the remaining areas and this must be included in any EIS for closure. Land managers should not be allowed to circumvent this evaluation. (Individual, Littleton, CO - #1219.61300)

...by closing more of the back country roads and making everyone stay in just a few areas, more damage will be done to the environment by having everyone concentrated in just a few areas. This will have more of an impact than letting everyone spread out. (Individual, Las Cruces, NM - #2775.80000)

**Public Concern: Natural phenomena cause more environmental damage than human recreational or commercial activities, so restricting human activities will not solve these environmental problems.**

The eruption of Mt. St. Helens wiped out more trees than the logging industry has or ever will. (Individual, Ahwahnee, CA - #4012.83000)

The very nature of these natural areas is that natural phenomena have a higher probability of eliminating these so called benefits than any motorized or other road using recreation would. Millions of acres of federal land are impacted every year through completely natural phenomena (lightning strike fires, mudslides, floods, etc.) (Individual, No Address - #2808.81000)

**Public Concern: The Forest Service should address whether wildlife are more threatened by foot traffic or by motor vehicles.**

**FOOT TRAFFIC**

It has been our experience that wildlife such as deer, elk and moose, feel MORE threatened by people on foot than by someone driving by in a vehicle. (Individual, Clancy, MT - #11329.83500)

**MOTORIZED VEHICLES/OFF-HIGHWAY VEHICLES**

Have you ever been sitting in a mature wooded area, hoping your entry while it was still night, would allow you to see wildlife undisturbed and not detect your presence? THEN, less than an hour after sunrise, an OFF THE ROAD VEHICLE blasts down a trail making enough noise to be heard for miles, let alone just several hundred yards from where you are sitting?! All of your plans and efforts are lost. This has HAPPENED TO ME. It is frustrating, very frustrating. (Individual, Mt. Auburn, IL - #2189.91500)

Thirty years ago four-wheel drive vehicles (4x4's) were uncommon, snowmobiles and all terrain vehicles (ATVs) were rare to non-existent, and fewer miles of forest roads existed. Today, many more people use the National Forests for recreational purposes, 4x4s are abundant, snowmobiles and ATVs are common, and a dense network of Forest roads exists. Studies demonstrate the effects of increased motorized off road traffic on wildlife. For example, Dorrance et al (1975) found that home range size and daily movement of white tailed deer increased with increasing snowmobile activity in Minnesota. Yarmoloy (1988) found that mule deer experimentally harassed by ATVs produced fewer offspring the following year. Also, excessive motorized vehicle activity encouraged by extensive road systems degrades the quality of experience for many public lands user such as hunters, fishermen and non-consumptive wildlife users. (State Agency, Santa Fe, NM - #17300.91000)

**Public Concern: The Final EIS should include an analysis of the cumulative effects of numerous concurrent national and regional planning processes on recreation.**

I would like to see the study of the cumulative impacts of recreation for all of the following: Sierra Nevada Framework, Roadless Initiative, The new Forest Service Roads Policy, The Forest Service Policy and Standards revision, The Wilderness Study revision for the Ansel Adams, John Muir, Dinkey Lakes and Monarch Wildernesses, the 2 National Park Plan Revisions, the BLM OHV Plan. All of these things are going on at one

time and their cumulative impacts have not been addressed. This is unacceptable. (Individual, Mammoth Lake, CA - #25660.72200)

### MOTORIZED

Much is made in the DEIS that the proposed action will enhance the opportunity for dispersed recreation. That is true only if people are able to get to these areas in the first place, and the concurrent USFS Proposed Road Management Rule certainly raises doubt about that. This rule is intended to remove “unnecessary” roads from public forests and I have seen estimates placing this as high as 80% of all forest roads. Even if this is an exaggeration, the potential impact on access and recreation is staggering. Nowhere in the DEIS is this issue adequately considered. Both the National Park Service and Bureau of Land Management are taking concurrent aggressive action to limit motorized recreation. Has the USFS even considered what the impact from those actions will be on public forests? The absolutely unacceptable future I can see coming from these actions are: most of the forest roads are shut down, the individual forests shut down all the trails in unroaded areas, we end up with Administrative Wilderness areas everywhere and all the people recreate together like minivans in the Disneyland parking lot. This will be a disaster and I do not support it. (Individual, Fort Collins, CO - #19429.72200)

With adoption of the PLANNING RULE and ROAD MANAGEMENT STRATEGY, the ROADLESS AREA CONSERVATION efforts take on a whole new dimension. The primary problem is not with the identification of the existing INVENTORIED ROADLESS AREAS because they have been well documented. The main problem will come later with the establishment of the UNROADED AREAS. Once these UNROADED AREAS are identified, motorized recreation feels the ability of the local managers to actively manage the areas will be constrained by the built-in mandate for ECOLOGICAL SUPERIORITY in the planning rule. The end result will be the ultimate abandonment of our national forests to the forces of nature. Taking into consideration the combined effects of the three aforementioned rulemaking processes, it is quite obvious that the ability of access and use of our national forests by the public for recreational pursuit will be sharply reduced. Additionally, our vehicles will be shifted to the more developed, or urbanized range and away from undeveloped, primitive and backcountry types of experiences. Needless to say, this will have, ultimately, a profound effect on the public. One of the more significant recreational values inherent in our national forests is the ability to easily traverse and discover the relative untouched and primitive back country environment with our motorized vehicles. (Recreational Organization, Cleves, OH - #18486.72100)

### **Public Concern: The Forest Service should develop additional alternatives to ensure recreation management is carried out within the scope of the proposed rule and Roads Management Strategy.**

Recreation is cited as the “Single Largest Use of NFS Lands” and a significant and continuing increase in that demand is forecast. The National Forest System Road Management Strategy, Environmental Assessment and Civil Right Impact Analysis, Dated February 9, 2000 is defined as a companion to this DEIS and calls for aggressive road decommissioning activities. I am unable to understand from these documents how the agency plans to address the rapidly increasing recreational demand for Forest access through the adoption of the preferred Alternatives of this DEIS with the contradictory approaches of these documents. 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, Sunnyvale, CA - #50735.72220)

### 6.7.6 Public Education, Monitoring, and Enforcement

Numerous respondents express concern over monitoring and enforcement of any recreational restrictions in roadless areas. Some users assert that any restrictions imposed upon their activity will simply be ignored in protest and note that enforcement is unlikely. However,

many other users do agree that better user education, monitoring and enforcement are key to reducing recreational impacts and conflicts. Many feel that rather than completely close areas or restrict certain types of use, the Forest Service should educate people about protecting the land. Another alternative to closure is to issue permits and hold each individual accountable for damage, one individual insists. Some suggest that the Forest Service should consider OHV permits that include 'Tread Lightly' or similar training information as a mandatory prerequisite for traveling, perhaps accompanied by a renewable license similar to street legal vehicles. The Forest Service should print trail guides for off-road vehicle users to direct them toward appropriate riding areas, some feel. Others suggest posting more informational signs at trailheads to make the public aware of when they are in ecologically sensitive areas. Others request that naturalist interpreters be placed in the campgrounds of the National Forest System.

Many others do not feel that education alone is sufficient to minimize environmental damage caused by motorized recreationists. They call for the Forest Service to enforce OHV use restrictions. In fact, a significant number of motorized users support greater enforcement, so that irresponsible users are punished directly rather than all users being further restricted. Many believe that fines should be imposed on OHV riders who go off designated trails. Others are concerned with out-of-bounds and illegal snowmobile use, especially designated wilderness trespass, and they call for stringent enforcement to discourage this behavior. Others however, note the conspicuous lack of enforcement personnel in the field due to budgetary restrictions, and therefore request that the Forest Service only allow motorized recreation in limited areas where the agency has sufficient resources to actively enforce regulations. Others suggest that the Forest Service should adjust personnel work schedules to assure weekend patrols for motorized travel enforcement. Many recommend the licensing of OHVs to aid in the enforcement of users' illegal actions. Another individual opposes licensing and increased fees which attempt to recovery agency costs, feeling that this unjustly restricts motorized access.

Finally, many respondents are concerned with the ability of the Forest Service to enforce any prohibitions included in the final rule, not just any that might apply to recreationists. The final rule should include explicit monitoring and enforcement plans for all prohibitions, they maintain. Some fear that local Forest Service personnel will be unwilling to implement roadless protection and assert that many Forest Service employees do not support this proposed rule. Other request that the final rule be consistently enforced on all individual forests so that all users and are treated fairly.

**Public Concern: Rather than close areas or restrict use, the Forest Service should educate people about protecting the land.**

We love driving through the forests and feel that education, not closure, is the key to preservation. (Individual, Salt Lake City, UT - #6752.91100)

Maybe if we would spend more time enforcing these areas along with educating people about the terrain & how to preserve it we could keep these areas open. (Individual, No Address - #7689.90000)

A national education program should be established for youth in grade and high schools, to better acquaint the students with what is out there to observe and study from the biodiversity to the recreation. (Individual, Roseburg, OR - #751.91100)

I know there needs to be control with the ATV traffic and I agree. The public needs to be educated on the damage done by these vehicles and the 4-wheel drives that break through snow drifts and open roads before they are ready. Very few people in our part of the woods rush into the woods tearing up terrain, we wait until the forest service tells us that the roads are open and we can get into Eagle Creek again. A few cannot be allowed to ruin America for the majority. (Individual, Union, OR - #11293.91100)

Keep the education process of the public and industry going. I applaud and support your efforts. (Individual, Spokane, WA - #7053.44010)

**Public Concern: The Forest Service should educate the public about the differences between national parks and national forests.**

Leave the forests open to “promote the most things to the most people” like the Forest Service is supposed to do. Do not lock land up, do not limit activities. The forest was set aside to use. It is not a National Park, and unfortunately the general public doesn’t know the difference [between] a National Park and a National Forest. Make it the Forest Service’s policy to educate the public what the differences are. (Individual, Vonore, TN - #5713.10200)

**Public Concern: In the event that everything is closed, the Forest Service should issue permits to individual users, then hold those individuals accountable for any trash left behind or environmental damage done.**

I think that this is the wrong approach as it is presented to me! Why punish all for what some jerk has done! If everything is to be closed off, then issue permits, for example 1 week, 1 month or for a year to a person, getting his car/truck plate info. And make him accountable for any destruction, trash or environmental damage that has been done. If a permit was issued, then nobody else could be there. You could control how many vehicles could be in the forest at any particular time. Thusly controlling the eco. Think about this. (Individual, No Address - #10372.10210)

**Public Concern: The Forest Service should consider off-highway vehicle permits that include a tread lightly or similar training course as a mandatory prerequisite for traveling.**

...My family and I have traveled all over the western U.S. adhering to the tread lightly code of conduct. I would not be opposed to OHV permits that include a tread lightly or similar training course as a mandatory prerequisite. (Individual, No Address - #1756.91712)

I feel we would have a more lasting impact by educating people on land-use and land preservation than just trying to close public land. What about a ‘permit to use’ plan where a limited amount of permits would be given out each year to use an ORV in a certain area during a certain time. The cost of these permits could be used towards land preservation, trail maintenance and education. When a person is awarded a permit, they are also given a ‘Land Use Guidebook’ to help educate them about the fragile land they are being given the right to enjoy. (Individual, Aurora, CO - #564.91100)

We all need to be educated how to treat our woods. Why not have classes for all citizens. Then give a card stating our education. Like a drivers license. Renewed every 5 years if we haven’t had our license revoked.

\$10 a piece or \$15 per family. [The] money to go to keep roads up in the wooded areas. If there is a surplus of money paying for the program. (Individual, Tensed, ID - #7589.91100)

**Public Concern: The Forest Service should print trail guides for off-road vehicle users.**

Trails are being developed now in less sensitive areas for ORV use. Efforts should be made to make these systems attractive to these potential users. This could be done by printing trail guides with points of interest and available facilities. (Individual, Medford, OR - #17514.64150)

**Public Concern: The Forest Service should place interpreters in the campgrounds of the National Forest System.**

Put Forest Service interpreters in the campgrounds of the National Forest System AS WAS RECOMMENDED TO THE CHIEF BY THE NATIONAL RECREATIONAL STRATEGY COMMISSION at Lake Geneva in 1987! (Individual, Durango, CO - #745.41200)

**Public Concern: The Forest Service should post wildlife signs to make the public aware of when they are in ecologically sensitive areas.**

[Post] notices on sign boards to make people aware of time of baby animals, nesting birds, certain food sources growing. This may make public more aware of what's not to be destroyed or bothered. (Individual, Moscow, ID - 7949.83500)

**Public Concern: The Forest Service should enforce off-highway vehicle use restrictions in roadless areas.**

Enforce the regulations against motorized vehicles in roadless areas; these ATV people are outrageous in their behaviors of ignoring restrictions and taking liberties with our national heritage. (Individual, Boulder, CO - #6367.91610)

An aggressive program to monitor and police our public lands must also be immediately developed and fully funded to combat and prevent illegal off-road travel and to put a complete stop to illegal "user created roads and trails." Violators' vehicles need to be confiscated and auctioned, with the proceeds going to fund the policing program. Your agency needs to offer a substantive alternative embodying such a policy. (Environmental/Conservation Organization, Albuquerque, NM - #52118.60000)

There is so much the agency can do now to stop the abuse of ORVs and motorized intrusions on the High Uintas, that incredible expanse of forest that I am primarily speaking to defend today. Start with increased monitoring and signing and issuing of violations that judges can make "stick," wider circulation of travel plans that can be easily read by a sixth grader so there is no mistaking where a driver and his machine are disallowed (six grade is the average level toward which average television programming is directed, I understand), and more closures to deter these blasting beasts of the backcountry. (Individual, Hyrum, UT - #15067.91200)



**Public Concern: The Forest Service should provide better monitoring and enforcement to responsibly accommodate all users.**

Our forests and lands can be managed for multiple use and in a responsible manner, which protects the forests and lands, and provides access for recreational and commercial activities. Better monitoring and enforcement of multiple use rules will accommodate all users in a responsible manner without excluding anyone. (Individual, Colorado Springs, CO - #2415.21000)

I would like much rather to see a strategy of enforcing existing trail use rules and development of more trails for all users. (Individual, Colorado Springs, CO - #2415.61300)

**Public Concern: Fines should be imposed on off-highway vehicle riders who go off designated trails.**

OHVs should only go on designated trails and not stray off the trails. If the OHVs go off the designated trails there should be fines implemented to help repair the damage done. (Individual, No Address - #2970.91100)

Along heavy-use routes: institute patrols to enforce “no off-road” and “no new road” rules. Hefty fines for violators and fees would help pay for road maintenance, turn-out maintenance and the patrols. (Individual, No Address - #2318.60000)

**Public Concern: The Forest Service should enforce out-of-bounds and illegal snowmobile use.**

Snowmobile use is grossly undercharged. It costs more to camp for one night than to use a snowmobile for a year. Even so, most snowmobiles are unregistered. Further, enforcement of out-of-bounds and illegal riding is largely unenforced, and the cost of enforcement far outstrips the revenue from use. (Individual, Markleeville, CA - #236.91613)

**Public Concern: The Forest Service should only allow motorized recreation in limited areas where the agency has sufficient resources to actively enforce regulations.**

I visit the Caribou area several times a month. I have never seen any Forest Service personnel in the area. I have read newspaper accounts in which the Forest Service claimed they were unable to address management issues in other areas due to resource or funding limitations.

Until the USFS can provide adequate oversight of motorized recreation I believe that you should protect the forest by limiting the places where it can be done to those you can provide adequate oversight for. (Individual, Nederland, CO - #6754.93610)

**Public Concern: The Forest Service should adjust personnel work schedules to assure weekend patrols for motorized travel enforcement.**

Does the Forest Service spend any weekends or evenings patrolling, controlling traffic? I doubt it. Why couldn't personnel be rotated on weekends-evenings instead of only 8 to 5 on weekdays, with check-in and check out at the office by 5 or earlier? (Individual, Fairview, UT - #10808.93600)

**Public Concern: The licensing of all-terrain vehicles should be encouraged to aid in the enforcement of users' illegal actions.**

I believe A.T.V.'s should be licensed with tags so they can be reported, should they act illegally. ATV's are out of control in areas of the forest I frequent Bridger Teton & Shoshone. (Individual, Lander, WY - #6122.91612)

**Public Concern: The Forest Service should revise the proposed rules governing Cost Recovery for Processing Special Use Applications and Monitoring Compliance with Special Use Authorizations.**

I . . . enjoy the use of Off-highway motorcycles (OHMs) and All-Terrain Vehicles (ATVs). . . . My access to public lands is being jeopardized by the proposed rules governing Cost Recovery for Processing Special Use Applications and Monitoring Compliance with Special Use authorizations. My primary concerns with the proposed rule are: the inability to appeal discretionary decisions made by one "authorizing officer" on each decision; and the absence of a "cap" or limit on the amount of processing and monitoring fees. (Individual, Canon City, CO - #1103.72100)

**Public Concern: The final rule should include explicit monitoring and enforcement plans for all prohibitions.**

There should be follow-up inspection to ensure that the rules are enforced if the proposal is approved. (Individual, Austin, TX - #757.93622)

There should be strong enforcement of existing roadless status. (Individual, Basin, MT - #3645.93622)

Another problem is the enforcement of these policies. I worked last summer in Oregon, and saw total abuses of stated policies and plans. For example, on Mt. Hood, there was a timber sale that would have cut--in a couple of months--the amount of acreage that the local management plan had specified to be cut over the period of a decade. Everyone fights so hard for sound management plans. Why bother if they are completely ignored? (Individual, New York, NY - #381.42000)

I would like to see the roadless rules funded and enforced. (Individual, Basin, MT - #7381.93622)

If you choose to enforce this plan, how do you plan to do so? (Individual, Carson City, NV - #790.71230)

I am concerned about construction of an ORV route constructed through a roadless area in the Abajo Mountains. It is my understanding that the route was illegally constructed, without due public review and in violation of environmental laws and National Forest policy. I urge you to look into this and enforce roadless area protections. (Individual, Brooklyn, NY - #8688.91612)

**Public Concern: The Forest Service should address the unwillingness of local Forest Service staff to implement roadless protection.**

I...want to call to your attention the antics of your staff in my neck of the woods. (See enclosures) I find it reprehensible that, rather than helping to educate the public to the necessity of conserving the living systems of the Sierra--which are the lifeblood of the whole state--the Tahoe National Forest staff continues to go on public record as cheerleaders for destructive practices. If they have eyes to see, they can't help but know that humans are using and misusing the mountains to death. A short hike in any direction from almost any point in TNF would tell them that...although there are so many roads that one doesn't need to walk anywhere to reach

anywhere else. Besides the wilderness areas, more and more parks and campgrounds are being taken over by deafening, polluting recreational machinery. It's crazy. Please apply some remedy in the case of the TNF staff, which is part of the problem, not the solution to ongoing destruction of public lands and heritage resources. (Individual, Lincoln, CA - #1671.42000)

I have concerns about the management of the rule change on the Caribou National Forest. In interviews with the local press and at public meetings the District Rangers have stated that there is no local public support for roadless and they say managing areas of the forest for roadless will be difficult and create lots of problems. They sound very much like the area's county commissioners. If this is the local rangers' attitude towards roadless will they be willing to implement the roadless plan and manage it correctly? (Individual, Pocatello, ID - #2128.42000)

#### **FOREST SERVICE EMPLOYEES DO NOT SUPPORT THIS PROPOSED RULE**

I have talked to numerous FS employees who are not too happy about this proposal. Why is that? If it is from the FS then why are they not endorsing it? Is it because the only jobs will be park rangers who control the maddening number of ATVs who make it off road because they can? (Individual, No Address - #2999.41200)

Having served as a District Ranger and in a number of staff positions at the forest, regional and national headquarters, I have some rather firm opinions based upon my education and experience. Among my beliefs is the conviction that management and protections of public forests is not well served by politically inspired edicts such as the current proposal to ban roads in some millions of acres of national forest lands. (Individual, No Address - #541.41000)

#### **Public Concern: The Forest Service should assure that the final rule will be consistently implemented and enforced.**

My concern comes from the actual enforcement and interpretation of these rules once they are made. A large part of our "northern economy" comes from these lands including timber harvest, snowmobiling, ATV, and multiple other recreation uses. While the intent of the rule does not reportedly affect these systems, it does provide latitude of "decision making" for this initiative. As I have seen far too often, these "initiatives" take on very personal flavors and often do not even closely resemble the original rules nor their intent. (Individual, WI - #2757.42000)

## **6.8 Land Ownership**

Many respondents express concerns about the effects of the proposed rule on private and non-federal land ownership. These concerns are covered in the following sections: 6.8.1 Urban/Forest Interface; 6.8.2 Inholdings; 6.8.3 Land Exchanges and Acquisitions; and 6.8.4 Transfer of Effects to Private and Other Public Lands.

### **6.8.1 Urban/Forest Interface**

Some respondents write that the Forest Service should reevaluate statements concerning the loss of open space as a rationale for the proposed rule. One citizen requests the Forest Service display quantitatively the relationship between urban areas, populations, and roadless areas in the United States. Others state the Forest Service should address access to public land through private land.

On an unrelated note, one respondent suggests the Forest Service allow homesteading and long-term camping on areas thought appropriate by local communities.

**Public Concern: The Forest Service should reevaluate statements concerning the loss of open space as a rationale for the proposed rule.**

In the discussion on open space, reference is made to the importance of roadless areas. Open space is most commonly referenced in areas of community growth, e.g., parks, riparian zones, undeveloped areas, etc. The statement that open space is being lost on other ownerships is not necessarily true--many counties are requiring open space through zoning and community planning. In addition, the document does not address roadless and open space contributions of other land management agencies, such as the BLM, NPS, FWS, etc. And, it is important to include that the demand for commodity uses will also increase in roadless areas. (County Elected Official, Worland, WY - 16185.71220)

The "Plan" states that in the last five years, 16 million acres of open spaces have been lost to urban development. Number one on their list of lands lost to urban development is "cropland." Cropland is farmland owned by farmers. I fail to see what this has to do with roadless areas on public land. If cropland was removed from this equation, there would be nothing left. I don't believe that the government is handing public land over to developers for houses and malls. (Individual, Sumpter, OR - #2749.31300)

Why does your plan cite the loss of non-Forest Service land, (1.2 million acres a year lost to urban sprawl) as justification for taking land out of production in areas like northern Minnesota that rely on resource-based economies? ... Fight urban sprawl where it is occurring and leave that as the separate issue it is. (Individual, Sovey, MI - #670.93700)

If you and the other do-gooder environmentalists in this country want to do some real good, try lobbying for common-sense development that would integrate more green space into the huge, ugly, overcrowded urban sprawl areas. At least then, you'd be addressing the real source of most environmental problems. (Individual, No Address - #216.41200)

**Public Concern: The Forest Service should display quantitatively the relationship between urban areas, populations, and roadless areas in the United States.**

Page 3-6, last paragraph-- The statement "many unroaded areas are located near urban areas" is not supported. The descriptor "many" is subjective and does not relate to Figure 3-3, Page 3-5. In fact, by interpreting the map one could infer few roadless areas are located near very many urban areas. Relief: The Forest Service must display quantitatively the relationship of urban areas, populations, and roadless areas in the United States. (County Elected Official, Worland, WY - 16185.71210)

**Public Concern: The Forest Service should address access to public land through private land.**

We need ACCESS TO PUBLIC LANDS THROUGH PRIVATE LAND. Private land is being bought up around national forests and closed off. We need to be allowed access through private land in eminent domain or all management of public lands will be a moot point. (Individual, West Point, UT - #4008.71120)

I would like to express my concern about the way private land owners are preventing me, a Federal taxpayer of Arizona, fisherman, hunter and hence co-owner of the Coronado National Forest as well as Arizona State lands, from having access to public lands by locking gates. These lands should be accessible to all who share their

ownership and pay for their management, not just the adjacent land owner and their friends. Many of these access points are the only way into forest lands. Locking access to these public lands essentially privatizes our National Forest and that is wrong.

There is legal precedence to keep roads open that have been used for years and are not suddenly closed and locked. The government agencies that manage these lands should exercise that legal prerogative to keep the gates unlocked. I understand the landowners concern about vandalism and trash left behind by a few and would even support a way to police the trash and compensate for the vandalism.

I encourage national and state agencies with public land management responsibility to do more to resolve this conflict. I would like to see a procedure put in place that would allow me to contact an office to register a specific complaint when access is denied. (Individual, Dragon, AZ - #7396.90300)

### **Public Concern: The Forest Service should allow homesteading and long-term camping on areas thought appropriate by local communities.**

Why not allow homesteading and long-term camping on areas selected by locals as appropriate? We have the capacity to live well with battery, solar, fuel cells, RVs and campers. With a little bit of imagination on the part of the Forest Service, small plots of land could be farmed and lived on for a portion of the year. (Individual, Stinson Beach, CA - #5651.64410)

## **6.8.2 Inholdings**

Many members of the public feel the Forest Service should consider the effects of the final rule on state trust land inholdings. An individual states “existing law provides the state with a right of reasonable road access to all of these trust lands.” One state elected official comments “for those sections of state land affected by the roadless proposal there is a concern that the potential to develop recreational opportunities will be lost.” Many agencies are concerned with effects of the proposed rule on access to state lands, and request that road access be guaranteed and that surrounding roadless areas be available for mineral leasing to be able to maximize the income to state trusts.

Other people are concerned with the effects of the proposed rule on inholder rights and private property and feel these effects should be addressed in the final rule. One county elected official reminds the Forest Service that the easement by necessity doctrine, whereby a grantor cannot landlock his grantee, also applies to the federal government. Some respondents feel the construction of private roads in close proximity to designated roadless areas should be allowed to prevent even greater environmental damage if roads must be routed to avoid roadless areas or if road access through roadless areas is closed. Some respondents believe the proposed rule will have positive impacts on the value of private property.

### **Public Concern: The Forest Service should consider the effects of the final rule on state trust land inholdings.**

The DEIS totally fails to address the state’s scoping comments. Not one mention of endowment lands or school trust lands is found in the entire DEIS. (State Elected Official or Staff, Boise, ID - #21160.63000)

Idaho Public Schools are badly underfunded generally. WE MUST BE ABLE TO MAINTAIN HEALTHY FORESTS AND HAVE GOOD ACCESS TO ENDOWMENT LANDS IF EDUCATION IN IDAHO IS NOT TO be negatively impacted. Idaho ranks 45th lowest in the union in pay for teachers, has a horrendous backlog of building maintenance problems, and because we are a rural state, we rely heavily on bus fleets to get our kids to schools. We do not have the population nor the industrial tax base (especially in Northern Idaho!!) to pay for educational needs. Please don't enact rules which will in the long run create more problems for our school districts. The DEIS is a very short sighted in that regard. (Individual, Sagle, ID - #5438.93740)

Will the states be expected to enter into land exchanges with the federal government since the state lands will be "landlocked" through the implementation of the proposed rule? (Timber Company or Association, Eugene, OR - #15879.90311)

We need access to state and private lands by crossing public lands. The Trust Lands Administration continues to manage approximately 15,000 acres of school trust lands in Utah the lie within National Forest Service boundaries. Most of these lands are in the form of scattered 640-acre section surrounded by national forest lands. Existing law provides the state with a right of reasonable road access to all of these trust lands. Inholdings and private lands adjacent to public lands must have access right-of-way maintained and guaranteed. (Individual, West Point, UT - #4008.90310)

In Wyoming, five (5) sections of trust lands would be affected by the roadless proposal. While it is difficult to determine the exact funding deficit that would result from loss of access or restricted access, the land itself has an estimated value of \$1,000 per acre. Thus, five (5) sections, each being 640 acres equals 3,200 acres which would thus equal \$3.2 million, the present worth. This does not account for any loss of future benefits that might be derived from resources/uses of the land. Also, the 3,200 acres does not include school trust lands in the Thunder Basin National Grasslands as that planning process is not complete and therefore the nominations for wilderness designations are not finalized. ... The proposal may deny the reasonable right of access to their [forest inholders'] lands pursuant to 16USC [Section] 3210(a) that requires the Secretary of Agriculture to provide access to non-federally owned land within the boundaries of the National Forest System as the Secretary deems adequate to secure to the owner the reasonable use and enjoyment thereof. (State Elected Official, Cheyenne, WY - #2816.90310)

For those sections of state land affected by the roadless proposal there is a concern that the potential to develop recreational opportunities will be lost. (State elected official, Cheyenne, WY - #2816.91000)

The proposed rule contains a vague reference to the need for access to inholdings within roadless areas: "a road may be constructed or reconstructed in an inventoried roadless area if the responsible official determines that...9a) road is needed pursuant to reserved or outstanding rights or as provided by statute or treaty." Proposed Rules (section) 294.12. This ambiguous language should be clarified to assure access to state and private inholdings, especially state endowment lands. Without such guarantees, the Idaho Department of Lands estimates that the proposed rules may result in losses of over 163 million dollars to the Idaho school endowment fund over the next thirty years.

In addition, there should be additional clarification that the Forest Service will not otherwise render access impracticable or uneconomical through the imposition of unnecessary restrictions. And, most critically, it should be clarified that in allowing such access, the Forest Service will not attempt to impose restrictions on the management of the inholding as a condition of granting access. (State Elected Official, Boise, ID - #18645.90310)

The DEIS fails to address the States' scoping comments. The State of Idaho spent enormous time and effort telling the Forest Service that our endowment lands must be completely isolated from any impact. We testified in public meetings during scoping, we submitted detailed written comments on this issue, and we went to a federal court to plead our case. The court agreed that our endowment lands are legitimate concerns. Many other states expressed similar concerns with endowment or school trust lands. Regardless of our effort, the DEIS does not even mention "endowment lands," or "school trust lands". Instead, all we see is a statement in the proposed rule that the roadless proposal "will not have substantial direct effects on the states". The Forest Service's failure to address our comments is unacceptable. (State Elected Official, Boise, ID - #13571.90310)

We cannot find a clear statement of how the proposal would affect land owners who are surrounded by, or adjacent to, proposed roadless areas as it relates to needed access through roadless designated lands. In Chapter 3, under "Real Estate Management", the DEIS states that under Alternatives 2 through 4, "...a potential effect on non-recreation special uses may result in a limited number of proposals or future proposals from being considered for authorization..." and that "special uses may be authorized in inventoried and other unroaded areas when the use and occupancy is consistent with the management objective's of an area's roadless values." (Page 141) It is not clear whether access to adjacent lands is considered a "non-recreation special use", and also unclear whether such use would possibly be considered "consistent with the management objectives of an area's roadless values." (State Agency, Olympia, WA - #17285.90300)

If the Forest Service adopts the preferred alternative, this close proximity to roadless areas will likely bring about public political expectations for how those adjacent school trust lands should or should not be managed. While we do not have costs calculated for the additional public process and mitigation that would likely be required to manage adjacent school trust lands, I surmise that they could pose a significant burden to the trust beneficiaries. (State Elected Official, Helena, MT - #19289.90300)

#### **MAKE ROADLESS AREAS ADJACENT TO STATE TRUST LANDS AVAILABLE FOR MINERAL LEASING**

[T]he Trust Lands Administration retained approximately 15,000 acres of school trust lands within NFS boundaries even after P.L. 105-335 exchange. The majority of these sections are within the Wasatch-Cache National Forest, in an area--the Overthrust Belt--known to have extremely high potential for oil and gas exploration and development. Because effective development of oil and gas potential typically requires substantial acreage, in order for the inheld trust lands to be fully developed for oil and gas in accordance with the State's trust mandate, surrounding NFS lands must also be available for leasing. (State Elected Official, Salt Lake City, UT - #43919.55000)

#### **Public Concern: The Forest Service should address the impacts of proposed rule on access for inholders.**

We are deeply concerned that your Draft EIS did not include the following: Adjacent private property owners right of access to their properties, of which some are surrounded by national forest or the defined roadless areas. (Individual, Cave Junction, OR - #6769.71130)

Many Americans need access to their private lands, which are surrounded by national forests. (Individual, Imbler, OR - #8029.71130)

In addition many private landowners that have property that adjoins the Forest Service land make it difficult for individuals to cross their property to get to the Forest Service land. They should not be allowed to do this. (Individual, Tucson, AZ - #9446.71130)

The policy violates the rights of private inholders. Within the National Forests in the South, there are thousands of acres of private inholdings. In Mississippi only about 55 percent of the land within the proclaimed national forest boundaries are in federal ownership. Under this policy, many private landowners could either be denied access or at least be charged fees to reach their lands. (Forest Products Company, Hermansville, MS - #10763.71130)

The best I can determine from an 800% enlargement of the internet map is that you have included some of my property in the roadless area, plus you are limiting existing access to my property. This is not acceptable. (Individual, Enid, OK - #80.90310)

If the Forest Service insists on going forward, a new NOI should be developed that includes: takings implications on inholdings. (Individual, Titusville, PA - #905.90310)

It does not appear that an analysis regarding road access to private property has been performed. What considerations or analysis have been made regarding ingress and egress for private property rights pursuant to 16 U.S.C. Sec. 1134? Please provide copies of such studies, maps, analysis, etc relating to closing roads in areas where private property rights. (County Commissioner, No Address - #47983.90310)

**Public Concern: The Forest Service should acknowledge that easement by necessity doctrine, whereby a grantor cannot landlock his grantee, also applies to the federal government.**

The federal courts have recognized that the easement by necessity doctrine, whereby a grantor cannot landlock his grantee, applies to the federal government. In other words, no seller, including Uncle Sam, can deny a right-of-way to his purchaser. *Leo Sheep Co. v. US*, 440 US 668, 679 (1979) and *4 Powell on Real Property*, [Section] 34.07 (rev. ed., 1997).

In fact, 36 CFR [Section] 251.114(f)(1) requires a federal officer issuing a special permit to ensure that the inholder “has demonstrated a lack of any existing right of access available by deed or under State or federal law”, which is, of course, an official recognition of the doctrine.

In *US v. Jenks*, No. 96-2106, the Tenth Circuit Court of Appeals acknowledged that pre-existing rights to access defeat the requirement for special use permits for road easements and that even without pre-existing rights of access, an inholder has statutory right to an easement from the government, with reasonable terms and conditions, under 16 USC [Section] 3210(a).

However, if an inholder can demonstrate that his right-of-way is a public road under Section 67-2-1, NMSA, 1978 Comp., (which, as you know, is New Mexico’s RS 2477 acceptance) then a special use permit is not required or even allowed to be issued, under the above quoted statute’s State law exemption.

Each inholder must decide himself whether it is cheaper and easier to submit and pay for a special use permit or to resist and prove to the government agents that he has no legal requirement of one. (County Elected Officials, Reserve, NM - #43567.90320)

**Public Concern: The Forest Service should allow the construction of private roads in close proximity to designated roadless areas to minimize environmental damage.**

A member company has planned and designed new roads under environmentally sensitive Best Management Practices (BMPs) to be constructed on private lands in the Fatty Piper area near Flathead National Forest as well as on private lands near the Horsehead Peak, Little Bear Creek, and McCormick Creek areas of Lolo National Forest. These planned roads, while fully on company land, could be opposed by the Forest Service simply because they would be “near” a designated roadless area without being actually within the roadless area. In the recent past, the Forest Service has opposed road construction on the company’s lands simply because the planned road was “near” a roadless area. In 1991, our member company submitted access request to the Flathead National Forest for a road in the Sullivan Creek drainage. It was almost two years before the Forest Service notified them that the request was denied because of the proximity that the road would have to a roadless area. The company was then forced to construct an alternative route solely across its land, requiring it to build a bridge over Sullivan Creek (which the original proposal would have avoided) and construct .75 miles of additional road over steep terrain that involved other creek crossings. (Timber Company or Association, Eugene, OR - #15879.71130)



**Public Concern: The Forest Service should allow access to existing roads and new road construction for private property access inasmuch as building alternative route on private land would cause greater environmental damage.**

In the Scout Camp area of Lolo National Forest, also in western Montana, one of our member companies has requested a permit and an easement to use existing roads on Forest Service land that, under the new rule, is designated to become a roadless area. If these adequate existing roads are abandoned and obliterated to create a new roadless area, the company would have to build new roads on both its land and other Forest Service lands to maintain access to its property. This new construction would create significantly greater environmental impacts to the landscape in the area that would occur through the use and maintenance of the existing roads. In the Mike Creek area of Lolo National Forest, one of our member companies submitted an easement request to the Forest Service to access 160 acres of its lands. The company would reconstruct a bridge crossing across Mike Creek that is no longer there. If a roadless area is designated as per the proposed rule, the company would have to build a very steep road through rocks and cliffs to access the isolated 160-acre parcel. Use of the already existing roads, and use of the current bridge crossing (which the company would reconstruct at its own expense), would have much less environmental impact than constructing the new road solely through company land. (Timber Company or Association, Eugene, OR - #15879.71130)

In the Scout Creek drainage of Flathead National Forest in western Montana, if a roadless area were to be created as per the rule, one of our member companies would have to construct a much longer road (1.5 miles more) over its own land on a very steep (60-70% grade) open slope, through talus and rock outcrops, to access a 200-acre tract of our land with high-quality timber. This road would have a significant visual impact on residents and people passing through the Swan Valley, and it would likely have a negative impact on grizzly bear habitat and passage. The logical alternative would be a road that has already been proposed and designed. It would be much shorter and on a much gentler grade through some Forest Service land. Such a road would have fewer negative environmental impacts, less visual impact, and would cost at least \$30,000.00 less to construct than the longer road through steep, open and highly visible terrain to keep the road solely on private property. (Timber Association, Kalispell, MT - #53304.90310)

In the Scout Camp area of Lolo National Forest, also in western Montana, a Montana timber company has requested a permit and an easement to use existing roads on Forest Service land which, under the new rule, is designated to become a roadless area. If these adequate existing roads are abandoned and obliterated to create a new roadless area, the company would have to build new roads on both its land and other Forest Service lands to maintain access to its property. This new construction would create significantly greater environmental impacts to the landscape in the area that would occur through the use and maintenance of the existing roads. (L, Kalispell, MT - #53304.90310)

**Public Concern: The Forest Service should consider the positive impacts of the proposed rule on private property values.**

Protecting natural environments such as roadless areas can increase the property values of adjacent private lands, sometimes significantly. One case study indicated an increase of 13% in the value of private property adjacent to the Green Mountains in Vermont. (Individual, Dickinson, ND - #16095.71130)

### 6.8.3 Land Exchanges and Acquisitions

Some citizens believe the Forest Service should purchase inholdings and acquire more land. Some offer that caveat that “Any land trades--from or to--the roadless areas should be critically analyzed by a team of qualified neutral professionals with the authority to pass or reject the proposal.” Others feel the Forest Service should address current deficiencies in the

evaluation and appraisal of proposed land exchanges. Another individual specifically requests the Forest Service refrain from selling or trading public forest land for development.

“Certain portions of the coal estate acquired by the State of Utah in the P.L. 105-335 exchange underlie areas in the National Forest System apparently within the areas subject to the proposed regulation,” states one elected official who requests assurances that access to resources underlying these exchanged lands be guaranteed by exempting them lands from the proposed rule.

**Public Concern: The Forest Service should purchase inholdings and acquire more land.**

Inholdings! The U.S. Forest Service should be buying-out inholdings within the national forests with every opportunity and “rounding-out” their (our) property boundaries, and, thereby, eliminating the need for maintaining roads for other than cost-effective and essential purposes. (Individual, Geneva, NE - #1788.90310)

I also was not sure if this applied to private lands. If so, then I think that is wrong. People can do what they want with their own land. If the government feels strongly about an area, then they should purchase the land. (Individual, Fort Collins, Co - #2506.90310)

Increase the number of acres in forests. (Individual, Solidew, WY - #3509.23000)

Extinguish, with financial compensation, all private holdings within designated wilderness and roadless areas. (Individual, Spokane, WA - #18777.64000)

Acquire all inholdings. (Individual, Minneapolis, MN - #15017.63000)

**Public Concern: The Forest Service should address current deficiencies in the evaluation and appraisal of proposed land exchanges.**

While the Forest Service may not feel this additional comment is germane, we cannot avoid objections to ill-advised Forest land sales and exchanges. There have been many inexcusable examples of this, involving incompetent appraisals and failure to compare values in land exchanges, among other deficiencies. (Preservation Organization, Hometown, IN - #2756.90310)

Any land trades--from or to--the roadless areas should be critically analyzed by a team of qualified neutral professionals with the authority to pass or reject the proposal. (Individual, Spokane, WA - #3124.64354)

**Public Concern: The Forest Service should refrain from selling or trading public forest land for development.**

Refrain from selling or trading public forest land for development. (Individual, Albuquerque, NM - #70949.90100)

## **Public Concern: The Forest Service should exempt lands exchanged under P.L. 105-335 from the proposed rule.**

The Trust Lands Administration and its educational beneficiaries are concerned that the proposed regulation could cause it to partially lose the benefits of the lands offered by the United States in the P.L. 105-335 exchange. The proposed regulation must reflect the following: P.L. 105-335 LANDS SHOULD BE EXEMPTED FROM THE PROPOSED RULEMAKING. Certain portions of the coal estate acquired by the State of Utah in the P.L. 105-335 exchange underlie areas in the National Forest System apparently within the areas subject to the proposed regulation. As stated above, the proposed regulation indicates that new or reconstructed roads are prohibited in inventoried roadless areas, subject to valid existing rights. Also, the second part of the proposed regulation may prohibit activities within yet to be determined unroaded areas. In either case, and even if the Trust Lands valid existing rights are taken into account, such alternatives could have a significantly negative impact upon the economic viability of these coal deposits. All coal to be mined from these lands will be mined by underground methods; however, road construction and other surface disturbance may be necessary for exploration drilling, ventilation shafts, portal access and construction, and various other ancillary facilities. Surface disturbance can also be expected from subsidence effect at the time of mining. All of these disturbances will be fully reclaimed at the end of mine life, but in the interim are a necessary adjunct to coal development. (State Elected Official, Salt Lake City, UT - #43918.55000)

### **6.8.4 Transfer of Effects to Private and Other Public Lands**

Many respondents request the Forest Service consider the effects of increased noxious weed, disease and fire occurrences on adjacent non-Forest System lands due to lack of management in roadless areas. One state agency asserts that the Forest Service may have to assume financial liability for fire and insect damage to non-federal lands. Others state the Forest Service should consider the effects of transfer of timber harvest to non-federal lands which may result from the proposed rule. They fear that countries with even more relaxed environmental rules will suffer increased ecosystem damage as they increase their own harvest levels to compensate for decreased federal timber. However, one timber company asserts that because this is a likely outcome, the Forest Service should provide the science, information, and incentive programs necessary for private, state and foreign producers to provide an increased, sustainable share of the timber and livestock production in the United States.

The Forest Service should address the off-site impacts of expanding wildlife populations, others say. County elected officials state, “The Forest Service needs to disclose the potential impacts of growing populations of wildlife species that may result in off-site impacts, such as grizzly bear, wolf, elk, and deer. Basically, populations in a growth mode result in migration resulting in potential depredation, human encounters, effects on livestock, and even domestic pets.”

Conversely, some respondents see positive benefits to adjacent private property from the proposed rule because unlogged and unroaded areas are help to protect private property from landslides and flood damage.

**Public Concern: The Forest Service should consider the effects of increased noxious weed, disease and fire occurrences on adjacent non-National Forest System lands.**

The proposal increases the risks of diseases and fires, particularly to adjacent non-industrial private forestland owners. (Business/Business Association, Raleigh, NC - #8091.90310)

This document should clearly define how this proposal affects state and private timber resources. Insects, fire, and disease that are transferred from the federal forests will have an adverse affect on State and private ecosystems. (Individual, Eagle, ID - #8450.90310)

The DEIS states that “Landowners with property adjacent to public lands benefit from enhanced property values.” (Page 3-169) Under ideal conditions this may be true. Our property, which borders national forest land, is managed under a State approved forest management plan. We have gone to great lengths and expense to maintain a healthy and fire-resistant forest. But that cannot be said for the Forest Service. Their land, which is upwind from us, is essentially not managed at all. It is overstocked and thick with brush and other ladder fuels and creates a serious fire threat to our property. Much of it is in Wilderness, and another 600+ acres is now identified as “roadless” which means that the fire threat will only get worse. That certainly does not increase either our peace of mind or our property value. (Individual, Markleeville, CA - #13284.90310)

Under current forest conditions, following years of fire suppression, many of our unmanaged wildlands are doomed to experience catastrophic fires, such as the Los Alamos fiasco. These fires can spread into surrounding managed forests, private property and communities. This rule making and the DEIS fail to adequately address this important issue. Los Alamos was a wake-up call they had best heed. (Recreational Organization, Saint Charles, MN - #6878.84200)

Comment: General-- Natural events, such as fire, transcend political and administrative boundaries. Any analysis must consider the effects of fires “boundary-less behavior “ The alternatives must be analyzed in context of the direct, indirect and cumulative effects on entire ecosystems and just not on Forest Service administered lands. The wildland urban interface, air quality, and any anticipated impacts to private landowners and private in holdings are all issues that must be disclosed. This section is well written and has a good deal of supporting data and information, but does not adequately disclose predicted effects with the “hard look” that is required by CEQ Regulations. Relief: The Forest Service must address the effects of the risks identified relating to the wildland urban interface, air quality, and other private and public ownerships. (County Elected Official, Worland, WY - 16185.71100)

Most of the write ups also comment on the amount of Leafy Spurge in the areas which, if not controlled, will have major effects on adjacent lands. Although I have not read the Roadless DEIS in detail, I do not see this category (Effects on adjacent Lands) covered in the Roadless IES. The DEIS should be withdrawn and this subject included in detail. (University/Professional Society, Laramie, WY - #25484.90010)

**Public Concern: The Forest Service should address its potential financial liability for damage to non-federal lands.**

The inability to access areas in a timely manner for insect, disease, or fire suppression will result in large disturbances that may not be able to be contained within the roadless areas. The resulting damage to non-federal property will create liability issues for the federal government and is unacceptable. (State Agency, Cheyenne, WY - #15889.70000)

**Public Concern: The Forest Service should consider the transfer of effects of timber harvest to non-federal lands which may result from the final rule.**

In Idaho, the Federal Government manages 64% of the State lands. The reduction in NFS harvests has concentrated harvest on non-Federal lands, causing greater damage to those areas. I have not seen this addressed as a consequence of curtailing harvests due to roadless area restrictions. (Business/Business Association, Princeton, ID - #417.71100)

The proposal mentions the possibility of these roadless areas serving as ecological anchors, allowing nearby federal, state, and private forests to be developed for economic purposes. The proposal should specify the tradeoffs, so the public can judge for themselves what will be gained or lost from this action. (Individual, Eagle, ID - #8450.90100)

While the initiative does not prohibit logging, it makes the cost of removing the products too high. It will require that it all needs to be done by heli[copter], not by ground transportation. Only large (generally old growth) timber is economically removed by heli[copter]. So the land is effectively removed from the production of timber and fiber products since old growth is not to be taken from public land with out extensive litigation due to special interest groups. So we will increase the pressure on that land that is left for fiber production. Private land is going to suffer as it will produce what is needed regardless of its ability to do so for a long continued period of time. At least Public land is very controllable by the public through the court system and through a process like this. (Individual, Bemidji, MN - #6275.93600)

Given a stable demand for timber products, when we lock up more timber from the inventory of harvestable forest, we shift the meeting of that demand to countries that have poor or non-existent forestry management. Those countries will provide timber without regard of the impact on future generations of poor forestry practices. (Individual, Ketchikan, AK - #199.93800)

With President Clinton wanting to take valuable U.S. land out of production, he is only shifting the supply to another part of the world, and in all likelihood to a place where greater environmental harm will occur. (Individual, Moscow, ID - #4007.93800)

Page 3-11--This section also makes a statement that "This analysis assumes that reductions in timber volume resulting from any of the prohibitions would not be replaced with timber volume from other National Forest System Lands." Other sections make the assumption that replacement volume would come from other sources, such as private ownerships and Canadian imports. The questions that need to be addressed are: 1) Will shifting the harvest to private ownership and Canada create a cumulative impact on other sensitive areas, species, and resources identified in the document? and 2) will the impacts potentially be more severe than those occurring on National Forest System lands?

RELIEF: The Forest Service must quantitatively analyze the affects of this statement on local communities, other environments (private lands and Canada), and the national demand for raw materials and address the questions of cumulative impacts to Canada and private lands. (County Elected Officials, Basin, WY - #43980.90010)

Page 3-9, 5<sup>th</sup> paragraph - A reference is lacking for the statement "The increasing demand for wood fiber will be met through a combination of international trade and domestic supply." What combination of trade and domestic supply? Are there cumulative effects associated with this shift in supply? This should be addressed and any potential effects disclosed. (County Elected Officials, Rawlins, WY - #15910.93100)

**Public Concern: The Forest Service should provide the science, information, and incentive programs necessary for private, state and foreign producers to provide an increased, sustainable share of the timber and livestock production in the United States.**

As commodities production continues to slide, and resource consumption continues to increase per capita and population increases, it is clear that the difference in timber and livestock production will be made up by state and private lands in the United States, and by imports. If that proves to be so, it seems appropriate to place increased emphasis on efforts by FS units in the arena of state and private forestry, research, and international forestry programs, and proportionately less on management of national forests for timber and grazing. Such shifts are not only pragmatic in that there will be increased pressure on those private lands to produce more commodities from an ever-decreasing land base. Given the ramifications of such a shift in forest policy, it is an equally necessary policy to provide the science, extension of information, and incentive programs to encourage both industrial forest land owners as well as non-industrial forest land holders to provide an increased share of the timber and livestock production in the United States in a sustainable, acceptable fashion.” (Timber Association, Medford, OR – #13658.20000)

**Public Concern: The Forest Service should evaluate the value of unlogged and unroaded areas as protection for private property from landslides and flood damage.**

These unlogged and unroaded areas also protect private property from landslides and flood damage. (Town Elected Official, Minneapolis, MN - #5392.71130)

**Public Concern: The Forest Service should address the off-site impacts of expanding wildlife populations.**

Terrestrial Animal Habitat and Species Comment: Page 3-75, Alternative 2-- The assumption for the “Proposed Action” states that “NO adverse direct, indirect, or cumulative environmental effects to terrestrial animal species and habitats would be expected...” All the arguments under the “No Action” alternative potentially mean larger populations of species that do not necessarily respect roadless area boundaries. The Forest Service needs to disclose the potential impacts of growing populations of wildlife species that may result in off-site impacts, such as grizzly bear, wolf, elk, and deer. Basically, populations in a growth mode result in migration resulting in potential depredation, human encounters, effects on livestock, and even domestic pets. An example of areas where this has occurred is Yellowstone (grizzly bears, wolves, bison, and elk) and the Rocky Mountain Front in Montana (grizzly bears and wolves). Relief: The Forest Service must identify the potential off-site impacts of expanding wildlife populations and potential indirect effects on people living in rural and semi-urban areas. (County Elected Official, Worland, WY - 16185.71100)