

# Executive Summary

## Introduction

The following is a summary of comment received by the Forest Service regarding the Roadless Area Conservation Proposed Rule and Draft Environmental Impact Statement (Draft EIS). The comment period was May 9 to July 17, 2000. The Forest Service has received close to 1.2 million responses, over a million of which are form letters. Each response may contain anywhere from one to several hundred comments.<sup>1</sup> These comments have been analyzed using a process called content analysis. This involves a systematic method of compiling, categorizing, and capturing the full range of public concerns regarding the proposed rule. Information from formal public meetings, letters, emails, faxes, and other sources are all included in this analysis.

Although this analysis attempts to capture the full range of public issues and concerns, it should be used with caution. The respondents are self-selected; therefore their comments do not necessarily represent the sentiments of the entire population. However, the analysis does attempt to provide fair representation of the wide range of views submitted. In considering these views, it is important for the public and interdisciplinary team members to understand that this process makes no attempt to treat input as if it were a vote. In no way do the results of the content analysis attempt to sway decision makers toward the will of any identifiable majority. What the content analysis process does is ensure that every comment is considered at some point in the decision process.

## Content Analysis Process

Content analysis is a method developed by a specialized Forest Service unit, the Content Analysis Enterprise Team (CAET), for analyzing public comment. This method employs both qualitative and quantitative approaches. It is a systematic process designed to provide a mailing list of respondents, extract concerns from each letter, evaluate similar concerns from different responses, and identify specific issues. The process also provides a relational database capable of reporting various types of information while linking comments to the original letters.

Through the content analysis process the team strives to identify all relevant issues, not just those represented by the majority of respondents. Breadth and depth of comment are important. In addition to capturing relevant factual input, the Content Analysis Enterprise Team identifies the relative emotion and strength of public sentiment behind particular viewpoints.

Content analysis summaries and reports are not intended to replace original letters. The summaries attempt to capture all significant concerns and issues related to a project. However, they are only summaries and the database reports are vital for actual response to comments. As noted above, the database reports are linked directly to individual letters. The sample comments contained in this summary simply illustrate the various viewpoints submitted by respondents.

---

<sup>1</sup> Responses refer to single, whole submissions from respondents--e.g., letters, emails, faxes, presentations at public meetings, etc. Comments refer to identifiable expressions of concern made within responses.

Letter numbers are provided, enabling the reader to track and review the original letter, if necessary.

## **Overview of Document**

This document contains nine chapters reflecting public sentiment on a variety of issues both diverse and interrelated. These issues range in nature from the strictly procedural to the technically specific. Public comment on these issues demonstrates the interest, strong feelings, and deep concern Americans have regarding the management of national forests and grasslands.

The Executive Summary begins with a general analysis, proceeds with identification and discussion of respondents' main areas of concern, and concludes with an overview of succeeding chapters. Within each chapter, each general section and major subsection begins with a narrative overview of the public concerns relevant to that topic. Following these narrative overviews, the public concerns are presented in a formal list, each accompanied with one or more supporting sample comments. A citation accompanies each sample comment identifying the respondent's organization type (e.g., individual, elected official, recreational organization, etc.), city and state, letter number, and category code assigned to that comment.

One point should be noted here. Not only are the organization types of respondents referenced in sample comment citations, they are sometimes referenced in the narrative overviews as well. Neither reference is meant to imply that only that respondent, or respondents of that organization type, expressed that concern. Public comment on this proposal is widely varied, and the sample comments which appear in this summary are purely representative.

## **General Analysis**

The Roadless Area Conservation Proposed Rule and Draft EIS (referred to generically as the proposed rule) has inspired intense public debate. On the one hand, people are divided over whether roadless areas should be accorded any further protection<sup>2</sup> than they presently receive. On the other hand, both those in favor and those opposed to further protection are at odds with the Forest Service over the Preferred Alternative identified in the Draft EIS. Neither group likes it—those who favor protection because it does not go far enough, those opposed because it goes too far. Thus it should be clearly understood that when this document makes reference to proponents of the proposed rule, it is referring to those who favor greater protection for roadless areas and, for that reason, favor the proposal to further protect them. This reference, however, should *not* be understood as implying support for the Preferred Alternative as it is presently written. Out of all the some 1.2 million responses submitted, very few respondents support that.

The reasons for this almost unilateral opposition to the Preferred Alternative are best illustrated in the debate between those who favor and those who oppose roadless area protection. This

---

<sup>2</sup> Although the proposed rule is titled the Roadless Area Conservation Proposed Rule, very few respondents use the term conservation when addressing this issue; rather, most use the term protection. Because it is the purpose of this document to fairly represent the public's views, the term protection is often used.

debate is driven in large measure by competing sets of values and viewpoints. In general, those who favor the proposed rule and those who oppose it fall roughly into two camps in terms of background and way of life, in terms of how they see the forest, and in terms of how they see the role of government. Such differences are not always clearly defined, and indeed may sometimes be more apparent than real. Yet it is clear that those who express strong views on this subject—which are the majority of respondents—are motivated by certain assumptions and points of emphasis related to the above factors.

Those who favor the proposed rule are not easily categorized in terms of background and way of life, as they do not generally identify themselves in those terms. It is those who oppose the rule who tend more often to do so. Opponents often identify themselves as persons connected in some way with forest resource industries; as persons who engage in motorized recreation on public lands or who, due to age or disability, are dependent on motorized access; or as persons who are or have been involved in public land management in various capacities. While no firm assumptions can therefore be made regarding the background and lifeway of those favoring the proposal, it is clear that the life experience of many opponents is rooted in a certain kind of relationship to forest lands, a relationship which clearly motivates a certain way of looking at the land.

Those favoring roadless protection tend to see forest lands as whole ecosystems which human activity disrupts. Thus for these respondents, protecting roadless areas consists in leaving them alone to evolve naturally through their own dynamic processes (although some proponents would condone some, very limited stewardship activity). Persons holding this view place a high priority on protecting the environment. They believe roadless areas should be protected for their own intrinsic value as undisturbed wildland, for the benefit of wildlife, and for the benefits these areas offer to humans. These places are important, proponents note, as sources of clean drinking water and clean air, and as places of solitude and spiritual renewal. As such, they believe as well that their value as places for passive recreation—hiking, backpacking, etc.—far exceeds whatever value attaches to the commercial resources they contain. Indeed, according to proponents, satisfying human desires for forest products (timber, minerals, etc.) must take second place to satisfying the real human need for a healthy environment—both local and global—and for quiet, natural places to escape to for mental and spiritual regeneration.

Proponents stress the view, moreover, that humans are not the only species on the planet, nor are they the only species whose needs and desires deserve to be met. In this regard, proponents tend to hold a very inclusive view of all living things. In holding this view, they are not insensitive to the competing concerns of those whose sources of enjoyment and/or livelihood depends on more ‘active’ uses of forest lands. But they do believe both that the need for roadless protection outweighs those other concerns, and that those concerns can in fact be mitigated, for example, through retraining programs, development of alternative materials, and the designation of less sensitive areas for motorized recreation.

Opponents of the proposed rule see forest lands differently than do proponents. They see them in terms of the resources they offer for human use. It is not the case that these persons do not care about the environment. Indeed they care deeply. Where the two groups differ is in their perspectives on what the fundamental role of forest land is, and hence what is the best way to

care for these lands. As noted above, proponents of roadless protection see the forest primarily as an ecosystem whose long-term health depends on being left alone. Opponents see the forest as an ecosystem as well, but an ecosystem capable, under proper management, of providing a host of goods, including numerous recreational opportunities, for human well-being. For these people, protection consists in managing these lands, in a sense, as one would a farm for the purpose of maintaining sustained harvests. Hence roads are necessary to allow management activities (fuel thinning, treatment for insects and disease, etc.), to allow responsible, sustainable resource extraction, and to accommodate increasing recreational demands. The failure to actively manage forest lands, argue these respondents, would doom these lands to insect infestations and catastrophic fire. True protection, they insist, consists in actively and prudently caring for these lands, the benefits of such care being the many uses humans enjoy. Moreover, opponents argue, prudent management benefits wildlife as well as humans. A number of species, they contend, thrive on early successional habitats created by timber harvest, and indeed, they go on, wildlife in general is not harmed by human use of these lands.

Thus what separates the proponents and opponents of the proposed rule is an honest difference in perspective regarding the fundamental nature and role of forest lands. This difference in perspective, however, gives way to highly charged perceptions, on the part of opponents, regarding their status in this whole debate. Opponents defend activities that those favoring protection decry; and because they see proponents as well financed and highly influential, they see themselves as the underdog. They consider themselves looked down on by “wealthy, elitist environmentalists” who try to ban the very activities opponents see as genuinely necessary, and who try to ban further the forms of motorized recreation that, for many opponents, have become much loved family traditions. Opponents of roadless protection express a great deal of resentment over what they perceive to be a condescending attitude by “big money” environmental groups who, they believe, are really the ones driving this plan. These writers feel discriminated against and disenfranchised. They believe their voices do not count, that the only voices that do count are those of the environmentalists.

This sense of disenfranchisement, coupled with the view that environmental groups are really driving this whole process, accentuates the deep distrust many opponents harbor for government in general. Those who favor the proposed rule do not generally express the same level of distrust toward government. Proponents believe that the need to protect these areas is so great and the scope of needed protection so dispersed across the country that only a national directive will adequately protect these lands. These respondents fear that if left to the discretion of local planners, roadless values will be sacrificed to influential, local commercial interests. Thus it is local forest managers that proponents distrust. They believe that absent a centralized directive requiring local forest managers to protect these areas, they simply will not be protected.

Those opposed, on the other hand, tend to see centralized directives as an assault on their freedom. Many of these respondents believe the government—by which they often mean to include national Forest Service leadership—has imposed too many restrictions on the American people already. They believe that if the proposed rule is adopted it will only be the start of more closures. Next, they believe, motorized recreation will be banned, and then these places will be declared wilderness. These writers claim, in other words, that once restrictions are imposed, those restrictions will only grow. Often these writers do not oppose the proposed rule because of

what it actually proposes to do, but because of the further restrictions they fear will follow from it.

In summary, those favoring the proposed rule and those opposing it tend to hold very different assumptions and beliefs regarding the nature and role of forest lands and the role and credibility of government, the federal government in particular. It is not necessarily the case that proponents and opponents occupy diametrically opposed positions within American culture at large. It is the case that, in general, these groups lean toward different views on a number of issues. In other contexts these differences may not be significant. But in the context of the proposed rule for roadless protection, these differences take on sharp contrast. The one group sees it as a positive step toward protecting what wildlands we have left, ultimately toward improving human well-being and preserving the health of our planet. The other group sees it as an assault on human freedom, an attack on their way of life, and a recipe for forest degradation.

These competing views are expressed by respondents within the context of a number of issues relevant to the proposed rule. Following analysis of public response to the Notice of Intent (NOI) to establish national direction for roadless area management, the Forest Service identified six broad categories of concern to the public. These categories are access, identification of other unroaded areas, exemptions, environmental effects, local involvement, and forest dependent communities. Based upon comments received following publication of the Draft EIS, it is clear that these remain key categories of concern to the public.

Added to these concerns, however, are concerns over the adequacy of the Draft EIS itself and concerns over the cumulative effects of this and other recent policy initiatives. Concerns over the Draft EIS, together with concerns over local involvement, fall under the wider category of the public involvement process in general. Concerns over cumulative effects were expressed during the comment period for the NOI; with publication of the Draft EIS, however, they have become much more prominent and thus now merit their own discussion.

New to this round of public comment as well, of course, are concerns over the alternatives presented in the Draft EIS and development of the rule. In a sense, comments on the alternatives do not make up a separate category of concern, as these comments are tied inextricably to respondents' concerns over other major issues. However, it is just as true that all of the issues of concern to respondents are deeply interrelated and do not easily give way to independent discussion. Nevertheless, for purposes of analysis they are useful distinctions to make; hence these eight categories of concern--access, identification of other unroaded areas, exemptions, environmental effects, public involvement, forest dependent communities, cumulative effects, and alternatives and rule development--will each be discussed in turn. These discussions all reflect the competing views which, as noted above, are motivated by different assumptions and beliefs regarding the nature and role of forest lands and the role and credibility of government.

One final point is worth making before moving on to these major categories of concern. Of all the responses received by the Forest Service, by far the majority have been form letters; to many of these the respondent has only added his or her signature, but to many others respondents have added personal comments. In addition to original letters, these form letters represent some of the strongest positions taken by respondents. Form letters in favor of the proposed rule almost

invariably ask that the rule ban all extractive activities and motorized recreation from roadless areas 1000 acres or larger; that it accord such protection immediately on a case-by-case basis; and that it include the Tongass National Forest in southeast Alaska. Form letters opposed to the proposed rule almost invariably ask that continued access be maintained for forest management, resource extraction, and recreation (with a special concern for motorized recreation); in addition, these letters often point to the negative effects respondents believe the rule will have on forest dependent communities. The personal comments often added to such letters do not generally add to the concerns formally expressed therein; they do, however, often indicate the depth of emotion respondents feel over these issues. The fact cannot be overemphasized that the debate over the proposed rule is—for many, many respondents—a highly emotional one; and it is only fair to acknowledge that while the majority of responses have been form letters, they are not thereby devoid of the same genuine, personal concerns and feelings expressed in original letters.

## **Access**

Among concerns expressed over the proposed rule, concerns over access are among the most prominent. Indeed other concerns generally have their basis in concerns over access. Those favoring the proposed rule believe that, for the good of the forest, access must be restricted. Because of the negative impacts human uses have on the environment, they claim, access for these uses should bow to the greater need for protection. These respondents call on the Forest Service to either ban or restrict a number of activities in roadless areas, including: timber harvest, mining, development of oil and gas reserves, grazing, motorized recreation including snowmobiles and, where applicable, watercraft. These activities, they argue, cause destruction and erosion and, in the case of off-highway vehicle (OHV)<sup>3</sup> use, cause excessive noise and pollution and leave behind piles of litter. Many respondents would like to see such outright banning or restrictions extend to all national forest areas, not just inventoried roadless areas.

Proponents offer a number of suggestions for limiting access. Some suggest that all roads not absolutely essential for forest management be closed. Others suggest that whole areas be closed routinely to all uses on a rotating basis. Some writers suggest that only the handicapped and senior citizens be allowed to use the road system. Many respondents specifically address OHV use, some saying it should not be allowed except for emergency situations. Quite a few suggest that certain areas be set aside and reserved just for OHV use. At the very least, many respondents note, the Forest Service needs to establish clear guidelines for the use of OHVs on National Forest System lands.

While many writers clearly wish to ban or restrict human activities in roadless areas or throughout the National Forest System entirely, some writers are quick to point out that the Preferred Alternative would not unduly limit people's use of the forests. Existing roads, many say, provide adequate access for forest management, recreation, and other uses. And as for the argument that the proposed rule would unfairly restrict access to all but the wealthy, young, and physically fit, a number of respondents—including those who are themselves elderly or disabled—

---

<sup>3</sup> Respondents refer to off-highway vehicles (OHVs), off-road vehicles (ORVs), and all-terrain vehicles (ATVs), usually in a sense which is interchangeable. To avoid confusion and preserve consistency, these vehicles are referred to collectively as OHVs in this document unless context requires a different usage.

point out that even with protection, numerous activities would still be available to those with limited mobility throughout National Forest System lands.

In short, proponents favor restricted access for human uses either within roadless areas or within the national forests at large. They point to the environmental damage done by these activities and the environmental benefits to be derived from limiting them (air quality, water quality, increased biodiversity, etc.). Finally, others note that the protection offered by the Preferred Alternative would not go so far as to unfairly restrict people, even senior citizens and the disabled, from using forest lands.

Opponents of the proposed rule, however, believe otherwise. Some point out, first of all, that natural phenomena cause greater environmental damage than do human activities—both recreational and commercial—so restricting human access would not be the panacea proponents believe it would be. Opponents point out further that where human activities do cause damage, the solution lies in stricter monitoring and enforcement, not in further restrictions.

On the whole, however, opponents' arguments against the proposed rule follow two lines of reasoning with respect to access. They argue, first, that active forest management activities are vital to maintaining healthy forests and that roaded access is essential to carrying out those activities. They argue, second, that a well managed forest is capable of supplying a number of goods to fill the legitimate needs of human beings—from forest products to recreational opportunities—and that roaded access is essential to taking advantage of those goods. These writers point out not only that well managed forests are capable of supplying such goods, but that a number of federal land use acts guarantee citizens the right to access them. Writers point to such acts as the Multiple Use and Sustained Yield Act, the Organic Act, the Federal Land Policy and Management Act, the Roads and Trails Act, the General Mining Law of 1872, and subsequent decisions surrounding RS2477 claims, as representing a body of legal protection for uses of federal public land which the Forest Service may not disregard.

Not only is concern expressed over access for extraction activities per se, but also over access to utilities and to water delivery systems for municipalities, etc. Concern is also expressed over access for public safety. Finally, much concern is expressed over access for all kinds of recreation, though particularly for motorized recreation. These writers often explain that OHV use has become a family tradition—one that family members of all ages and physical ability can enjoy, and one that provides young people a wholesome alternative to many of the problems besetting today's youth. It is also an activity, most of these writers point out, they engage in responsibly. They stay on approved trails and pack out their own litter, as well as litter left by others. While admittedly there are irresponsible OHV users, these writers point out that the vast majority, who are responsible, should not be restricted because of the actions of a few, and they greatly fear that that is exactly what will result from the proposed rule. Many, in fact, seem to feel that the proposed rule will close down a majority of the national forests to all use.

A number of opponents also point out that if access is restricted to some areas of the forest, then use will concentrate in other areas, thereby leading to greater environmental damage in those places. Writers also argue that access should be maintained to existing camping and recreational areas, as should access to roads of historical or scenic significance. In addition, a great many

opponents express the concern that roadless area protection will unfairly shut off these areas to the very young, the very old, and the disabled—that roadless areas will be open only to the physically and financially elite, those with the physical stamina and financial resources to allow for extended trips into the backcountry. Indeed, some respondents suggest that the Forest Service should do more to accommodate people with special needs, at least in some roadless areas, by providing senior citizen paths, wheel chair access, and short loops for sightseeing.

Finally, a number of respondents express concern over issues surrounding privately owned land. One such concern is access for inholdings. Another is access to federal public land through private land. Writers complain that as lands adjacent to national forests are bought up by private individuals, those individuals are closing and blocking access to longstanding routes into the forests. Writers report that this is a growing problem which the Forest Service must address.

In summary, opponents to the proposed rule are concerned that access must be maintained for forest management activities, extraction activities, and recreation. They believe not only that such activities, carried out responsibly, do not harm the forests (indeed in the case of management activities are good for them), but that established law is on their side. They are concerned that the proposed rule will unfairly shut out the elderly and/or disabled from certain areas of the forests, leaving those areas as “private playgrounds” for the wealthy, physically fit elite. Finally, these writers are concerned over legitimate access to private inholdings and over continued access to longstanding routes into the forests which now run through private property.

### **Identification of Other Unroaded Areas**

The identification of other unroaded areas has to do with the criteria to be used for determining the roadless areas to be covered by the proposed rule. This is a topic of much confusion to many respondents. Many who oppose the proposed rule are concerned that the vague description of what constitutes an ‘other unroaded area’ or ‘uninventoried roadless area’ will lead to the inclusion of all sorts of areas, including many that have existing roads and are currently open to various uses. Many ask for more precise definitions, and request maps to show where these ‘other’ areas are located. A few mention certain areas that they particularly do not want to be considered roadless. Many of these are areas where ski resort expansions or other proposals are pending.

On the other hand, many of those who support the proposed rule voice concerns about how uninventoried roadless areas will be managed in the interim until they can be inventoried and considered for protection. Many ask that the inventories be done immediately, and include areas smaller than 5,000 acres. In addition to the unroaded portions of inventoried roadless areas, some proponents believe wilderness study areas should be included. Many suggest that the rule cover all remaining uninventoried roadless areas. These writers point out that uninventoried roadless areas certainly provide the same values as inventoried ones, and see the distinction between them as arbitrary and unwarranted. A number of writers suggest protection be extended to roaded areas of inventoried roadless areas as well.



Many respondents maintain that the roaded status of a given area should not be the determining factor for inclusion under the proposed rule, but the area's biological value. Quite a few writers argue that biologically significant areas of any size should be protected.

With respect to the minimum number of acres to be accorded protection, respondents' views vary. Some would prefer not to set any minimum acreage boundary, and suggest the proposed rule apply to all roadless areas of any size. Beyond that, respondents suggest a variety of acreage sizes be protected. By far, however, most proponents favor protection for areas of 1000 acres or more. Some say, at the least, that the minimum acreage should be 1000 in the eastern United States, where vast tracts of roadless areas do not exist as they do in the West. Some also suggest roadless areas of 1000 acres or larger be included when within 10 miles of another roadless area or a national park.

On the whole, most respondents favoring the proposed rule believe the Forest Service's suggested 5000 minimum acreage within inventoried roadless areas is inadequate. While writers make varied suggestions, the overwhelming sentiment is that roadless areas of 1000 acres, inventoried or not, be protected by this rule.

## **Exemptions**

Respondents express a great deal of disagreement over the question of whether exemptions from the proposed rule should be allowed. Many argue that no exemptions should be allowed, others argue that they should. The most prominent issue of debate is the question of whether roadless area protection should be extended to the Tongass National Forest. Opinion on this issue parallels opinion on the proposed rule. That is, support for including the Tongass comes from those supporting the proposed rule; opposition to including it comes from those opposed to the rule. Concern about this issue, however, is not equally represented by those respondents favoring and those opposed to the proposed rule. Among proponents of the rule, the sentiment is very, very commonly expressed that the Tongass should be included, regardless of where these persons reside. Among opponents of the proposed rule, comments voicing objection to including the Tongass come almost exclusively from Alaska residents.

These writers argue that implementation of the proposed rule in the Tongass would have devastating economic impacts on Alaska's forest resource industries and rural, forest dependent communities. They also express resentment that people the whole country over, with utterly no knowledge of local conditions in southeast Alaska, are promoting the inclusion of the Tongass. In addition, these writers point to the years of work and public collaboration that have gone into the recently completed Tongass Land Management Plan, and say it would make a mockery of the whole forest revision process to simply override it by national mandate. Thus they feel the Forest Service should defer any action on the Tongass.

Those in favor of including the Tongass, however, point out that the Tongass is not the only forest with a recently completed forest plan and argue there is no legitimate, scientific reason for excluding it. Indeed, these writers assert, a decision not to include it could only be interpreted as a bow to political pressure from Alaska's congressional delegation. In that vein, a number of

Alaskan residents in favor of inclusion make a point of saying that Alaska's politicians do not speak for all Alaskans.

Not only do most proponents of the proposed rule favor including the Tongass, by far the great majority of these respondents argue that the Preferred Alternative, T3, does not go far enough. The Forest Service, they argue, should adopt Alternative T4. These writers emphasize the environmental benefits to be gained by including the Tongass, and the environmental degradation to be incurred by not including it. Thus they say the Tongass needs protection now, that adoption of Alternative T4 would put the Tongass in line with other national forests, and that in any case there are already sufficient roads to meet timber, recreational, and subsistence access needs. Writers also argue that given local sentiment on this issue, only a decision at the national level would suffice. As one person puts it, "Even if Tongass decision makers have the inclination to protect roadless areas, they may be unable to do so in the social, economic and political climate in which they live and work. If roadless areas are to be protected in the Tongass, local decision makers should be insulated from the fallout of that decision, and so the decision should be made *now*, at the national level."

In addition to comments regarding inclusion of the Tongass, respondents make a number of comments regarding areas or activities they do or do not want exempted from the proposed rule. For example, opponents ask that exemptions be made for mining, oil and gas exploration, utility maintenance, ski resort expansions, and special use permits for scientific research projects. Proponents ask that no exemptions be made for stewardship logging, salvage harvest, ski areas, and that exemptions from the ban on road construction in general be severely restricted. Some maintain that any exemptions from the rule should be subject to the National Environmental Policy Act (NEPA) analysis process and independent scientific review. As one respondent explains, "For far too long, [activities for 'forest health'] have led to the flagrant abuse and destruction of much of our remaining real forest." These persons insist that if exemptions are granted, the rule won't mean anything. Respondents also identify a number of specific areas they wish to see included or excluded from the proposed rule. These areas are listed in Appendix B.

## **Environmental Effects**

Respondents differ greatly in their views on how the proposed rule will affect the environment. These differences are rooted in the views people have on the nature and role of forest lands. In general, those in support of the proposed rule see it as a necessary step to improving and preserving the health of roadless areas with respect to a number of factors; while those opposed see it as a barrier to forest health. Opponents argue as well that the proposed rule is grounded in a number of misconceptions about the nature of ecosystems and the effects of human intervention. These different views are discussed with respect to forest health, vegetation, wildlife/fisheries, biodiversity, watersheds, soil, and air quality.

### **FOREST HEALTH**

Forest health is a broad term representing a wide array of more specific issues. In general, those favoring the proposed rule believe the result will be at least some significant amount of acreage

protected from development. They believe these areas will be much healthier if left intact and undisturbed, and thus much less vulnerable to catastrophic fire and disease and insect infestation.

Opponents of the proposed rule, however, believe that active management is essential to maintaining forest health. These writers argue that fuel management and fire suppression are necessary to prevent large, catastrophic fires, and that roaded access is needed to carry out these activities as well as to treat for insects and disease. A number of respondents point to the Los Alamos and other fires this summer as evidence of the need to actively manage forest lands.

#### **VEGETATION**

With respect to vegetation, many proponents of the rule cite the need to protect old growth from timber harvest. There is also a great deal of concern expressed over the influx and spread of noxious weeds. Most proponents do not believe active management is necessary to control invasive weeds; they believe the best prevention is to simply restrict human entry. One writer explains that “Invasive weeds are brought into areas by foot traffic, motorized traffic and livestock . . . Robins, magpies and other weed wildlife follow the human routes into roadless areas. Weed plants and weed wildlife reduce the habitat of native species thereby pushing out native plants and animals.” Another writes that “Weeds follow roads . . . The areas of our forests that have yet to be invaded by noxious weeds are almost exclusively found within roadless lands. Building roads into them will only allow the weeds an avenue of spread.”

Opponents see things differently. They believe, to begin with, that because forests are dynamic it is a myth to think single-aged stands of growth, e.g. old growth, can be ‘protected’ from change. Second, opponents believe active management is necessary to control invasive weeds precisely because they believe human entry into forest lands has little to do with the spread of weeds. To put the blame on human activity, protests one respondent, “shows an utter disregard [for] the forces of nature. The wind in conjunction with bird and animal droppings will continue to spread plants regardless of the whims of [some] bureaucrat.” Further, some opponents point out, roads actually have a beneficial effect on forest vegetation, as they let in the sun.

#### **WILDLIFE/FISHERIES**

Those in favor of the proposed rule argue that active management negatively impacts wildlife and aquatic species. Most often they point to roads, motorized recreation, and all forms of logging as having the most detrimental effects on wildlife. Roads, many writers argue, fragment forest areas, thereby interrupting natural wildlife corridors necessary for maintaining genetic diversity. At the same time, they go on, road induced sedimentation in rivers and streams compromises water quality, and thus the viability of aquatic species.

Those opposed to the proposed rule argue not only that active management does not harm wildlife, but that it actually benefits it. As one writer points out, “Animals like managed forests a whole lot more than the wilderness areas which are overgrown with brush and messed up with fallen trees.” Remarks another, “The harvested areas will be beneficial to wild game with the grasses growing in the area until the timber takes over again.” A number of respondents point out that snowmobile use benefits wildlife inasmuch as it provides them a packed down trail to use in preference to surrounding deep snow. Some writers point out, further, that plants and

animals go through natural cycles of new species development and extinction, and these cycles occur in roadless as well as roaded areas.

#### BIODIVERSITY

Many proponents of the proposed rule point to the negative effects of roads, logging, and OHV use on biodiversity, and the positive effect of roadless areas in preserving and enhancing it. Notes one respondent, roadless areas are especially important “because they are a reservoir of biodiversity that we will need to draw on for medicines, food and other resources.” Opponents of the rule, however, discount the assumption that the preservation of biodiversity requires undisturbed forest land. Believing as they do that human activity is not inimical to the well-being of plant and animal life, these respondents believe the proposed rule is simply not necessary to further that purpose.

#### WATERSHEDS

One of the most common environmental concerns respondents raise is the need to protect watersheds for the clean drinking water they supply. As with other issues, views on what that does or should entail differ greatly. Those favoring the proposed rule insist that protection of roadless areas is essential to maintaining high quality watersheds. A number of writers suggest as well that cattle and OHVs should be banned in riparian areas. These writers maintain that roads and logging lead to siltation of waterways, and so should be prohibited in roadless areas specifically to protect watersheds. Logging should be prohibited, these respondents assert, not just because of the erosive effect of the activity itself, but because of the importance of tree stands and attendant vegetation for water retention. As one person explains, “Just a few square feet of foliage can hold quite a bit of water.” Says another, “Healthy watersheds soak up rainfall and snowmelt like a sponge and release it into rivers and streams slowly throughout the year.”

Opponents of the proposed rule argue just as strongly that active management is necessary to preserve high quality watersheds. Specifically, a number of writers maintain that managed timber harvest improves stream flow. Asserts one writer, “Large trees use over 100 gallons per day to exist . . . . Our streams . . . need the water for stream flow that the mature trees are capturing before the water has a chance to even get to the streams.” These respondents argue as well that damage to watersheds does not necessarily come from developed activities. “Where,” asks one respondent, “is the discussion of the effect of fires—large ones—on the watershed as well as dying and diseased forests? . . . we have such large buildups of fuel and the fires that may occur now are going to have large effects on water and erosion that the Forest Service does not seem to be taking into consideration.” Further, adds another, what is compromising water quality in some areas “is *not* roads and timber management, but acid rain. The acidity of the rain and snow is not a by-product of road construction and timber management, but is the by-product of industrial pollution from outside of the area.”

#### SOIL

Proponents of the proposed rule point to activities—e.g., road building (particularly on steep slopes), logging, and motorized recreation—as leading to soil erosion. Opponents protest, as they do with respect to watersheds, that erosion is not necessarily the result of human activities. In

fact, some writers point out, lack of management, leading to heavy fuel buildup, leads to fire, which is itself a cause of soil erosion. Explains one respondent, “Several hundred acres of the Bucks Lake Wilderness [were] reforested after a wildfire. The trees are now over 20 feet tall. They are also so thick that if a fire starts the fuel loading will create a devastating heat and the area will become a brush field again. This area is prone to lightning. There will be a great amount of erosion as the granitic soils have a tendency to float away.”

#### **AIR**

Those favoring the proposed rule point to the contribution trees make to clean air as an especially important reason to protect roadless areas from development. These respondents also point to the air pollution produced by certain activities, particularly OHVs and snowmobiles, as a reason to restrict these activities. Opponents of the proposed rule, however, respond, much as they do with respect to watersheds and soil erosion, that these activities are not necessarily responsible for poor air quality. Rather, an important cause of poor air quality is lack of management, which leads to fires. These writers argue, further, that motorized recreation does not cause that much air pollution, and that chronic air quality problems on national forest lands originate outside of those lands.

#### **Public Involvement**

A great many respondents comment on the adequacy of the public involvement process. It is through this process that individuals take part in and contribute to decisions made about national forest land management. Thus comments received on public involvement issues reflect people’s perceptions about how fair the process is—how responsive the Forest Service is to the concerns of individuals and user groups, and how adequate the process is in eliciting cooperation and collaboration with affected groups and agencies. In general, those who support the proposed rule comment favorably on the public involvement process, while those who do not support it believe various aspects of the process are deficient.

It is in this context that trust and integrity issues arise. By far, most comments which touch on trust and integrity come from respondents who do not support the proposed rule and believe it is being pushed through either illegally or in a manner that wholly ignores the needs and concerns of large segments of the population. Because most comments touching on trust and integrity are of this type, they may give a skewed impression of public attitudes toward the Forest Service, the documents it produces, the decisions it makes, and its overall accessibility and responsiveness to the public. Thus it is important to point out that favorable comments are also expressed—not as often or, generally, with the same reference to circumstances and details as opposing comments, but they are expressed. Indeed, judging from the overall tone of all of the responses received, it is fair to say that, despite the (often severe) levels of distrust expressed by many respondents, there is among many respondents a high level of regard for the agency itself and for the efforts it makes, both as an organization and as individual employees, to manage public lands in a way that protects the environment yet serves the needs of the public.

Comments on public involvement will be discussed with respect to collaboration with governments/agencies, the role of citizens, local versus national decision making, decision

making process and authority, trust and integrity, adequacy of the Draft EIS, adequacy of resources, adequacy of public meetings, solicitation and adequacy of public comment, and adequacy of the comment period.

#### **COLLABORATION WITH GOVERNMENTS/AGENCIES**

A number of respondents remark that the Forest Service should make greater efforts to work collaboratively with other government entities and agencies. In particular, writers stress the need to work more closely with states and counties. A number of respondents believe states should have much more say than they presently have over the management of national forests. These writers feel decisions and initiatives coming out of Washington are unduly influenced by environmental groups and do not take into account local conditions and needs. Indeed some insist that management of these lands should be turned over entirely to individual states; others maintain it should be turned over to counties. At any rate, there is considerable consensus on the part of many writers that there is a need for better multi-agency collaboration on local levels. On the other hand, some respondents favoring the proposal ask that states not be allowed undue influence over management decisions. These writers believe local jurisdictions are too much influenced by corporate interests and cannot be trusted to do what is best for the land.

#### **ROLE OF CITIZENS**

Respondents on both sides of this issue believe citizens' voices should count—that is, that the Forest Service should take into account majority opinion. Respondents differ, however, on what they believe the majority opinion is. Those opposed to the proposed rule point to polls showing most people are against closing public land as evidence that most people oppose this rule. Those favoring the rule point to polls showing most people support protecting roadless areas as evidence that most people support the rule. And respondents on both sides question the accuracy of the other's polls. A number of writers suggest that in order to get a true picture of where the public stands, a nationwide vote should be held.

Just as respondents on both sides of the issue believe citizens' voices should count, they also believe some voices should not count more than others. Both sides express resentment over what they believe to be undue influence coming from special interest groups on the other side. Those in favor of the proposed rule insist that corporate interests should not be allowed undue influence over management decisions. Those opposed insist that environmental groups should not be allowed undue influence. This latter sentiment cannot be overemphasized; for opponents, this deep resentment over the perceived influence of environmental groups makes up one of the most prominent themes running through public comment.

Not all comments on this topic, however, are so partisan. A number of writers point out the great need for compromise and, to that end, suggest the Forest Service bring in advisors from all user groups to help in formulating management decisions.

#### **LOCAL VERSUS NATIONAL DECISION-MAKING**

One of the questions on which proponents and opponents of the proposed rule are most divided is the question of whether management decisions for national forest lands should be made at the

local level or at the national level. Opponents of the rule believe, categorically, that decisions should be made at the local level. They argue that a Washington based, one-size-fits-all approach is not in the best interest of individual forests; rather, decisions should be made by local managers familiar with the land, in concert with local public involvement, so that where there are problems solutions can be tailored to specific situations. A number of opponents of the proposed rule also believe that local citizens should have more say than others over how forest lands are managed, and resent very much a process that allows people living 3000 miles away a voice in the management of *their* forests.

Proponents of the rule, however, believe just as strongly that management decisions should be made at the national level. They do not believe local managers can be trusted to do what's best for the land in defiance of local corporate and political pressure to do what's best for business. As one writer puts it, "Though less federal involvement is preferable in other areas, the 'quick buck' will often win out when local managers are faced with decisions about recreational access and logging. Protecting what is left of our national heritage . . . is a job only [the] federal government can assure." Another writer explains the local forest manager's position in more human terms: "Most of them live in small towns and naturally are sympathetic to their local friends . . . . Of course they will be influenced by friends at coffee or church. What supervisor from a little town . . . could stand up to locals who need jobs? But national forests are not his forests. They do not belong to locals either. They belong to us all."

In a nutshell, opponents of the proposed rule do not trust the national leadership to be responsive to local needs; proponents do not trust local forest managers to adequately protect the land. And local forest managers often feel stuck in the middle of an impossible situation—a situation, some insist, only made worse by the way this initiative has been handled. This point is made especially poignantly by the Forest Service Council: "We Forest Service employees are caught in the middle. We are here to carry out government policy the best that we can. But we also live in rural communities affected by the Roadless Area Initiative. Because of the way this initiative was handled by the administration, the level of distrust toward the Forest Service and its employees has reached an unprecedented level. This is very sad, because a little bit of consideration by the administration for our diverse populations could have gone a long way toward diffusing the heated situation. As it now stands, the damage that has been done to our public relations and our community support may take years to repair and rebuild."

#### DECISION-MAKING PROCESS/AUTHORITY

Some proponents of the rule make a point to say they approve of the process through which the proposed rule is being considered, and they approve further of the role played by the President in initiating this proposal and of the Forest Service's response in formulating the proposed rule. Opponents, however, take a different view. Many of them complain that the whole decision-making process for this rule is moving too fast, and are therefore suspicious of the intentions behind it. These writers believe as well that it is not for the executive branch to be dictating public land management. Further, they argue, the Forest Service is itself exceeding its authority, since the agency must take its directives from Congress.

### TRUST AND INTEGRITY

Opponents of the proposed rule *very often* express grave distrust in both the administration and the national leadership of the Forest Service. They believe the rule is politically motivated; that the whole public input process is a façade to hide the administration's attempt to build a favorable legacy; that the proposed rule was formulated in unfair, even illegal collusion with environmental groups; that it is an attempt to bypass Congress in creating de facto wilderness areas; that the real intent of the rule is to lock people out of public lands, indeed that it is, according to some, all part of a great conspiracy involving the United Nations to deprive Americans of the rightful use of their lands; and that the decision has already been made, hence nothing they say will matter.

Proponents of the rule, on the other hand, are appreciative of the administration and the Forest Service for initiating this proposal. When these writers express distrust it is over what they perceive to be a cave-in to corporate interests. Given that, according to most proponents, the Preferred Alternative does not go far enough, one writer asks whether the real goal of the Forest Service is to save ecosystems or to appease environmentalists (with *some* protection) while continuing to allow destructive activities. At the same time, a number of proponents assert the suggested exemption of the Tongass is merely a bow to political pressure from Alaska's congressional delegation and is intended only to placate logging interests.

### ADEQUACY OF THE DRAFT EIS

Some proponents of the proposed rule remark that the Draft EIS is informative and well done. By far, however, most comments on it are negative. Respondents claim that the document contains contradictions between sections, as well as between the summary and the parent document; that statements should be supported with references; that its analysis rests on faulty assumptions (e.g., that areas free of roads must therefore be pristine); and that maps are inaccurate and/or lack specific detail. Both those favoring and those opposed to the rule express concern over statements they consider to be vague, subjective, and open to interpretation. Those in favor fear the vague language leaves open too many possibilities to local managers to continue to allow activities they believe to be harmful; those opposed fear the vague language leaves open the possibility that almost any area can be declared roadless and so subject to the rule. In this vein, writers make a number of references to specific pages or sections indicating inaccurate or unclear language or analysis they feel should be corrected.

### ADEQUACY OF RESOURCES

Some respondents comment that the Forest Service website is helpful and well organized. Others complain that internet accessibility of documents is poor. Quite a few respondents complain as well that requested documents have not been sent in a timely manner.

### ADEQUACY OF PUBLIC MEETINGS

A few respondents commend the Forest Service for the quality and informativeness of the meetings they attended. Many others, however, complain that the meetings were held at extremely inconvenient times and locations and that presentations were not sufficiently clear and accurate. With respect to public participation, both those in favor and those opposed to the



proposed rule argue that public comment in these meetings is not, and should not be seen as, an accurate indication of public sentiment. A number of respondents, on both sides of the issue, said the meetings they attended were dominated by persons and groups representing the other side, and they felt too intimidated to stand up in the face of so much opposition and express their own views.

#### SOLICITATION/ADEQUACY OF PUBLIC COMMENT

Some respondents compliment the Forest Service for its solicitation of public comment and are generally appreciative of the efforts made to be responsive to the public. A number of other writers, however, question the adequacy of both the public comment the Forest Service receives and the Forest Service's consideration of those comments. Some writers, skeptical of the whole process, ask the Forest Service to give assurance that the public's comments are even considered. Others suggest that the very validity of public input is in question. Notes one respondent, "This whole process is supposedly driven by public input, the problem is that the validity of the public input is not being addressed. Instead of valid public opinion surveys based on scientific methodology, what you are doing is akin to a call-in poll and has the same inherent fault in its lack of validity." Another respondent asserts that the content analysis process used to report public comment is inadequate inasmuch as it does not provide statistics to show the actual, quantitative strength of public opinion. Another respondent claims that, given the time frame, written comments from the scoping process could not possibly have been adequately considered. "There were only 27 weeks," this person writes, "from the Oct. 19, 1999 Notice of Intent date to the May 10, 2000 DEIS release. It would take 28 people working 40 hours per week to evaluate the 365,000 responses, *if* they spent only a menial 5 minutes per response . . . . Is this a comprehensive and reasonable review of such an important topic?" Many respondents comment, in addition, that public comment is inadequate for the simple reason that the Forest Service has not given citizens enough time and information to make informed comment.

#### ADEQUACY OF COMMENT PERIOD

A few respondents believe the comment period on the Draft EIS was adequate and should not be extended. The overwhelming sentiment expressed, however, is that it was woefully inadequate and should be extended. The most common reason given for requesting an extension is that the comment period, as is, does not provide sufficient time to read all of the relevant documents and consider the cumulative impacts of this and other recent Forest Service initiatives, and thus to provide adequate comment. Writers ask for various extensions: 60 days, 90, 120, until September, until the end of the year, and until the current administration ends.

### Forest Dependent Communities

A great many respondents are very much concerned over the effects of the proposed rule on forest dependent communities. Most of the people who address this issue are residents of such communities and oppose this rule because, among other things, they believe it will have a devastating economic impact on both their community as a whole and on individual families, and that it will destroy a way of life that, for many, dates back for generations. Although not as numerous, quite a few comments also come from those favoring the proposed rule who maintain

that the consequences for these communities will not be nearly so dire as opponents claim, and indeed that the impact will be positive. The specific issues most often addressed are the economic impacts to forest dependent communities, the impacts on local employment, payments in lieu of taxes to counties, and a particularly volatile issue for many, many writers from these communities—the adequacy of the social effects analysis presented in the Draft EIS.

#### **ECONOMIC IMPACTS TO FOREST DEPENDENT COMMUNITIES**

A great many respondents write that the proposed rule will devastate communities; many communities, they insist, are supported solely by the timber industry and will simply be wiped out by further restrictions. Many writers are equally concerned about the restrictions on motorized recreation which they believe will follow from the proposed rule. They maintain that much of their local economy is grounded in the motorized recreational industry which caters to tourists to their area. Restrict this form of recreation, they charge, and there go the tourists. Wilderness areas, they insist, do not generate tourism; rather, the availability of lands to active recreation does. Further, a number of writers argue, not only will the proposed rule devastate rural communities in general which are dependent on forest products, it will unfairly affect communities in the West, since that is where most such communities are. In fact, some writers see this as a deliberate attempt to destroy rural, western communities.

Those favoring the proposed rule, however, do not believe these communities will suffer nearly such devastating effects. They argue that small, rural economies are increasingly becoming more dependent on aesthetic and (passive) recreation opportunities than on timber, and that such communities are attractive to new business developments. Thus the proposed rule will actually help these economies. As one writer points out, “Far from dooming local economies, wilderness areas and pristine forest bring in, on average, 38 times as much money as logging or mining. Eco-tourism and hospitality industries are often locally owned and sustainable whereas large extraction companies are often owned by far off conglomerates and will move once the resources are gone.” This latter point, that work in forest resource industries is not dependable over the long haul, is a point often made by those defending roadless conservation. As one writer explains, it is likely the case that no extraction projects produce enough long-term, high paying jobs to justify the environmental damage they cause.

#### **IMPACTS ON LOCAL EMPLOYMENT**

Opponents of the proposed rule charge that the Forest Service has grossly underestimated the job losses likely to follow from this rule. Not only will jobs in the timber industry be lost, so will jobs indirectly related to it. In other words, these writers argue, the proposed rule will have a domino effect: as people in the industry lose their jobs, there won't be enough money in these small towns to support other businesses. These respondents argue as well that it is fine for others to tell them they should transform their economy from one based on resource extraction to one based on recreational tourism, but the fact is, jobs in recreational tourism do not pay as well. Further, they argue, less management of forest lands will increase their susceptibility to catastrophic fires—which can hardly be good for tourism.

What is often not said in these comments, but implied, is that the sort of changes being suggested to these individuals and communities are not so easily made. For many of these writers logging

is a way of life their family has pursued for generations, it is a way of life their community is built around and in which their very identity is grounded. Moreover it is, for them, a good way of life, a source of meaning and value. To suggest they move their local economy from one based on timber extraction to one based on tourism is suggesting much more than a mere job change. It is asking them to give up one 'culture' for another; and what is often implicit in these comments is a sense of helpless frustration that changes are being thrust on them to which, they fear, they may be incapable of adjusting.

Those favoring the proposed rule are not unsympathetic to the plight of timber workers and their families and communities. Many point out, however, that ultimately the Forest Service cannot control the destiny of rural communities; there are larger social and economic forces at work here. As technology has advanced, they argue, and social mores have changed, any number of industries have had to adjust or die out—fair or not, that is just the way the world is. In this vein, a number of writers suggest that it is technological advancement, not a reduction in land available for timber harvest, that is to blame for job losses in the timber industry. Several writers also suggest, however, that the government could do much to ease the transition for these workers by instituting retraining and/or relocation programs.

#### **PAYMENTS IN LIEU OF TAXES**

One issue that often comes up in the context of impacts to forest dependent communities is the issue of funding these communities receive from the Forest Service. Because the federal government owns land (in this case, national forests) which, if owned privately would generate tax revenues to counties and states, the Forest Service makes payments in lieu of taxes (PILT) based on 25% of timber receipts. Many opponents to the proposed rule argue that it will have the effect of ending or severely restricting timber harvest, thus ending or seriously curtailing an important source of revenue to rural communities. Since the greater proportion of these funds is often earmarked for schools, respondents claim children will be unfairly affected. As a consequence, many writers insist that these communities should be compensated for this projected loss of funds. Others argue, however, that such compensation would amount to welfare, and people in these communities—proud and independent as they are—would bristle at a government handout. Still others argue that this whole system of paying communities from timber receipts should be reevaluated; surely, suggests one writer, there must be a better way to fund rural schools.

#### **ADEQUACY OF SOCIAL ANALYSIS IN THE DRAFT EIS**

The social analysis of timber workers which appears in the Draft EIS (primarily the passages on page 3-190) has stimulated an extraordinary amount of comment—entirely and categorically negative. Respondents see it as biased, condescending, and indicative of a total lack of respect for workers in the timber industry. They see it as one more piece of evidence that the national leadership of the Forest Service has been infiltrated by “radical environmentalists” who have no regard whatever for the work and value they represent. They argue that sources used for the analyses were inadequate. They claim that the conclusion drawn from the analysis—that individuals and communities can adjust to any circumstances if only Forest Service timber management policies are consistent and reliable—shows how little the Forest Service understands their true circumstances. Many writers demand a public apology. Some acknowledge the

apology that has been made but say it is not enough. Most insist that an apology and retraction should be made in the Final EIS.

The intense level of emotional reaction to this analysis cannot be overemphasized. There is already such a strong sense, on the part of opponents to the proposed rule, that this whole process is being unfairly driven by environmental groups, and that it will unfairly deprive people of legitimate access to forest lands to engage in any number of legitimate activities. Timber workers especially, whose lifeway links them so closely with the land, take great offense that an activity which sustains their families and communities—which they believe represents a valued contribution to this country’s goods and services, and which constitutes as well a needed method of forest management—should be touted by environmentalists as destructive and something that should be severely restricted or outright banned. Add to that now an analysis they feel belittles and demeans them. As a result, comments on this analysis are, without question, among the most intense and volatile of all comments received.

### **Cumulative Effects**

A number of comments received during the scoping period touched on the need for an analysis of the cumulative effects of this and other recent and ongoing Forest Service initiatives and planning efforts. Without question, though, such comments have been far more prominent this time around. Respondents note that this is the fifth major national policy initiative issued by the Forest Service in six months, the others being the proposed planning regulations, the proposed road management and transportation system regulations, the draft Government Performance and Results Act (GPRA) strategic plan, and the unified policy for a watershed approach to management. Writers note that while “these proposed rulemakings and policies have been released separately, . . . all of them are in some way directly or indirectly related to each other and to this proposed roadless area protection rule.” Adding to the confusion, they go on, is the fact that “the Forest Service has failed to provide any useful information on how the many proposed rulemakings and policies are related or their cumulative impact on management of the National Forest System.”

Over and over again, respondents complain they do not have enough information about the combined effects of these many proposals to meaningfully comment on them. A common refrain is that “it is unreasonable to expect the public to read and fully understand the overall management direction of the agency by looking at the individual documents in piecemeal.” Rather, “The public must be made aware of how these proposed [policies] relate to one another.” Further, “We have grave concerns for the number of administrative and legal challenges that these interrelationships between your agency’s current and proposed policies represent.” Writers also want to know what the cumulative impacts of this proposal will be in conjunction with existing environmental legislation, e.g., the Threatened and Endangered Species Act, the Clean water Act, and the Wilderness Act, etc.

Most such comments do not attribute any sinister motives to the Forest Service for failing to provide what they consider to be an adequate analysis of the cumulative effects of this and other proposals. For the most part, respondents see it as a careless, but serious lapse in analysis that it

is essential to correct. Some respondents, however, do see sinister intentions at work. According to some, “The Forest Service has purposely divided this very significant action into several parts to avoid its legal responsibilities under the National Environmental Policy Act, the Regulatory Flexibility Act and the Small Business Regulatory Enforcement Fairness Act. By separating what is, de facto, a single action into subparts, and then refusing to properly document the resultant cumulative impacts in an adequately prepared Draft Environmental Impact Statement, Cost-Benefit Analysis, and Initial Regulatory Flexibility Analysis, the Forest Service has made it impossible for the public to provide meaningful comments on either the overall proposal or any portion thereof.”

## **Alternatives and Development of the Rule**

The Draft EIS presents four prohibition alternatives, four procedural alternatives, and four alternatives addressing management of the Tongass National Forest. This represents a large number of possible combinations, and many respondents do speak to a number of those possibilities. A discussion of all of those comments within the context of this summary would be unwieldy. This discussion therefore only points out general trends in respondents’ preferences. Following that is a discussion of comments regarding the development of the proposed rule.

### **ALTERNATIVES: GENERAL TRENDS IN PUBLIC THOUGHT**

In general, respondents opposed to the proposed rule believe the Preferred Alternative goes too far. They believe enough land has been set aside already, that they have a right to use forest lands responsibly for both resource extraction and recreation, and that any further restrictions on access will prohibit needed forest management activities and deny citizens the rightful use of their public lands. Thus they support the No Action prohibition and procedural alternatives. A number of respondents—primarily from Alaska—write in favor of the No Action Alternative for the Tongass; they believe the recently completed Tongass Land Management Plan represents an effective compromise between different interests, that it offers sufficient environmental protection, and that any further restrictions would hurt rural, forest dependent communities.

Of those in favor of the proposed rule, some report that the Preferred Alternative represents a reasonable compromise, and some support Alternative 3 on the grounds that it maximizes benefits while at the same time its economic impact does not far exceed that of Alternative 2. By far, however, the overwhelming majority of these respondents support the strongest possible protection for national forests. Many ask specifically for adoption of Alternative 4D or 4DT4, or for an expanded version of 4D that prohibits all activities they consider to be destructive. More commonly, whether proponents specifically mention the alternatives or not, many ask that all unroaded areas of 1000 acres or more be protected from road building, logging, mining, oil and gas development, grazing, and other activities they consider harmful, that this protection extend to the Tongass, and that it be implemented now, not put off to the forest planning process.

### **DEVELOPMENT OF THE RULE**

Respondents have a number of concerns related to the development of the proposed rule, including the process through which it is being considered, decided upon, and (if adopted)

implemented. Many of these concerns relate to the authority by which it is being developed; the role of the Forest Service; the role of states and counties; the role of citizens and of special interest groups; local versus national decision making; and the adequacy of the document used to present the proposal to the public, the Draft EIS. In large measure, these topics have already been addressed in this summary under public involvement; they are covered in greater detail in Chapter 2.

In addition to concerns related to these topics, respondents also raise specific questions about the rule's applicability and relationship to other forest management decisions. Some, for example, are confused over the duration and statutory authority of the proposed rule. "The summary volume," one person writes, "would have led me to believe that subsequent forest plans could undo this rule's prohibitions. On more careful reading, especially of the rule itself, I was persuaded that the rule is intended to apply until it is superceded by another rule and could not be overruled at the forest level in forest plan revision." Thus further clarification is needed. Others ask whether the proposed rule will require changes in land use designations and/or amendments to forest plans. In this vein, many writers are concerned about what the proposed rule's relationship will be to existing forest plans and what effects it will have on them. In addition, many writers believe the proposed rule should call for site-specific evaluations of roadless areas; and a number of respondents say it should not be allowed to supercede projects which have already met all legal requirements for implementation. Respondents thus have a number of concerns regarding the development, implementation, and applicability of the proposed rule.

In summary, respondents voice a number of concerns relative to access, identification of other unroaded areas, exemptions, environmental effects, public involvement, forest dependent communities, cumulative effects, and the alternatives and development of the rule. Concerns are rich and varied, reflecting as they do the rich and varied perspectives of individual citizens and groups. For the most part, however, respondents tend to support or oppose the proposed rule depending on their beliefs and assumptions regarding the nature and role of forest lands. As pointed out earlier, proponents see the rule as a positive step toward protecting what wildlands we have left, ultimately toward improving human well-being and preserving the health of our planet. Opponents see it as an assault on human freedom, an attack on their way of life, and a recipe for forest degradation. These competing beliefs shape the concerns respondents raise relative to specific issues and inform the deeply emotional character of this debate.

## **Overview of Chapters**

Due to the highly interrelated nature of the concerns expressed by the public, the following chapters represent broad, overlapping areas. Every effort has been made to organize respondents' comments into natural, clear, and accessible categories. However, due to the common, overlapping threads which run through these issues, similar concerns often appear in multiple chapters.

**Chapter 1, Purpose and Need**, addresses the general reasons respondents give for why the proposed rule should or should not be adopted, and concerns related to the Forest Service's mission and guiding policy. This latter topic includes concerns over needed clarification of the

Forest Service's mission; National Forest System land management and environmental protection; and multiple use management.

**Chapter 2, Consultation, Coordination, and Public Involvement**, discusses public concerns regarding coordination and cooperation with governments and agencies, including tribal consultations; the rule making process, including the authority by which it is proceeding and the role of various parties; issues of trust and integrity; and the public involvement process.

**Chapter 3, Legal Issues and Concerns**, addresses respondents' comments regarding general legal issues; federal environmental acts and laws; federal land management acts and laws; mining acts; proposed legislation and acts; and treaties and tribal laws.

**Chapter 4, Alternatives and Rule Development**, covers public concerns over the development of the alternatives; the range of alternatives; suggested new alternatives; the prohibition, procedural, and Tongass alternatives; alternatives considered but eliminated; additional areas to be included in the proposed rule; exemptions; and development of the proposed rule.

**Chapter 5, Environmental Effects**, addresses public comment regarding general environmental effects; forest health; weeds, insects, and disease; fire; biodiversity; vegetation; wildlife; habitat; connectivity and fragmentation; aquatic wildlife; threatened and endangered species; watersheds; soils; air quality; and global effects.

**Chapter 6, Human Uses and National Forest System Land Management**, addresses public comment regarding general management considerations; travelway infrastructure management; commodity, extractive, and commercial activities; wildlife-dependent activities; non-timber forest products; cultural and heritage resources; recreation and travel management; and land ownership.

**Chapter 7, Social and Economic Considerations**, covers respondents' concerns regarding the social and economic effects of the proposed rule. The former topic includes comments on the social value of non-commodity resources, community and family values, aesthetic and scenic values, and the bequest value to future generations; the latter includes comments about the economic effects on small businesses and forest dependent communities, the local tax base and revenues, grazing permits and fees, costs associated with mineral and oil and gas development, and agency costs and funding.

**Chapter 8, Cumulative Effects Analysis**, addresses concerns regarding the relationship of the proposed rule to other Forest Service planning processes and proposed rules; and cumulative effects. Under this latter topic are included comments on the cumulative effects of the proposed rule in combination with other policies, plans, and programs, and the adequacy of the cumulative effects analysis in the Draft EIS.

**Chapter 9, Technical and Editorial Concerns**, covers general technical and editorial concerns; concerns over clarity of terminology; contradictory concepts; identification of specific terms and concepts; requested changes; definitions; and adequacy of maps, tables, figures, and appendices.