

Chapter 9 Technical and Editorial Concerns

This chapter covers the public comment concerning perceived technical and editorial shortcomings in the proposed rule. These disparate comments are divided into seven sections: 9.1 General Comments; 9.2 Clarity of Terminology; 9.3 Contradictory Concepts; 9.4 Identification of Specific Terms; and Concepts; 9.5 Requested Changes; 9.6 Definitions; and 9.7 Adequacy of Maps, Tables, and Appendices.

9.1 General Comments

The clarity and size of the proposed rule elicits many diverse comments. Numerous citizens believe that the Forest Service should make its Environmental Impact Statements shorter and less complicated. Eliminating repetition in the Draft EIS is one suggestion offered to accomplish this goal. Another respondent, believing the proposed rule doesn't go far enough in protecting national forests, suggests that the Forest Service should begin using the term "National Tree Farms" to describe Forest System Lands. Decrying the lack of clarity of the overall proposal, one person writes, "I think it [the proposed rule] is an extreme response to a problem that has not even been clearly explained or described."

Public Concern: The Forest Service should make its Environmental Impact Statements shorter and less complicated.

Please do not send me any EIS volumes. They are too long and too complicated to read and understand. (Individual, Longview, WA - #803.30000)

I can't understand why the government has adopted the passive voice as their official language. A great deal could be cleared up if "legalese" could be replaced with clear, concise, writing. (Individual, Olympia, WA - #538.31100)

Public Concern: The Forest Service should eliminate repetition in the Draft EIS.

In my years of reading Technical Specifications and Contracts for DOD contractors this document ranks as one of the worst written documents I have seen. There are large portions of the document that are unnecessarily repeated verbatim several times. This appears to be done for no purpose other than to confuse the reader and make analyzing the document problematic. (Recreational Organization, Huntsville, AL - #10130.31000)

Public Concern: The Forest Service should use clear and honest language.

If your agency is not going to protect our forests, then please at least let the public know exactly and precisely what the public owns: National Tree Farms, not National Forests. This simple change in wording would go far toward exhibiting an honest approach with the public. (Individual, Florence, OR - #3618.42000)

Public Concern: The proposed rule is vague and short on reasoning.

I think it is an extreme response to a problem that has not even been clearly explained or described. Why is this being done??? Why not manage the problem versus eliminate the usage??? Again, this proposal is way too vague in description and short on reasoning. (Individual, No Address - #2707.31100)

9.2 Clarity of Terminology

Numerous terms used throughout the Draft EIS need to be modified or clarified according to various respondents. One respondent would like the Forest Service to make a distinction between conservation and preservation. The phrase “the roaded portion of the inventoried roadless area” prompts one citizen to question why the area is called “roadless” when it contains a “roaded portion.” Another individual wonders whether all roadless areas will be protected when the Draft EIS contains the statement that the proposed rule would “prohibit construction and reconstruction in *most* inventoried roadless areas.”

Citing another potentially confusing term, a constituent requests that the Forest Service clarify the phrasing of the proposed rule’s alternatives. The No Action Alternative may be misinterpreted by the public as a “No Logging” Alternative, according to this respondent. Tangentially, one citizen exhorts the Forest Service to strengthen the language of the proposed rule by removing the word “whether” from all the alternatives in the Draft EIS. Some respondents would like the Forest Service to evaluate the use of the word “natural” in describing roadless areas.

Public Concern: The Forest Service should clearly distinguish the difference between conservation and preservation.

The document repeatedly references the “Conservation” of roadless areas. In reality, the discussions in all chapters refer to protection and preservation of roadless areas. The proposal, alternatives, and discussion all lead to the concept of “preservation” and not “conservation.” Conservation is more appropriately defined as the “wise use” of resources--not withdrawing them from use. The Summary, Page S-2, defines the importance of roadless areas for watershed and ecosystem health only. The resources in roadless areas must be identified as being important to community health in regard to stability, dependency, jobs, income, payments to states, etc. The proposed action leaves little discretion for management of resources in roadless areas. (County Elected Official, Sheridan, WY - #51045.31000)

Public Concern: The Forest Service should clarify the use of the phrase, “the roaded portion of the inventoried roadless area.”

“The roaded portion of the inventoried roadless area?” Give me a break...why call it roadless if it is not physically? Those trails are often to the same standard as an mtc. Level 2 road. (Individual, No Address - #1602.32000)

Public Concern: The Forest Service should clarify the statement in the booklet of questions and answers that this proposal would “prohibit construction and reconstruction in most inventoried roadless areas.”

From the Questions and Answers booklet, the proposed rule: Page 9--this proposal will “prohibit construction and reconstruction in most inventoried roadless areas.” So it really does not cover all areas. (Individual, No Address - #1203.64150)

Public Concern: The Forest Service should clarify the phrasing of the proposed rule’s alternatives.

After reading the information on your web page, I have the following comments on your specific proposals and alternatives. First, your phrasing of the alternatives to your preferred plan was unclear at several points, perhaps leading to confusion among the public. I presume that your “Do Nothing” alternative means to not change policy; however, some may be misled into thinking that it means “Do Not Log” - I hope that you take this into account when reviewing public comments. (Individual, Mystic, CT - #8132.31000)

Public Concern: The Forest Service should remove the word “whether” from all the alternatives in the Draft EIS.

I applaud the effort to let local land managers have authority in evaluating roadless area characteristics. However, I believe that the word “whether” should be removed from all alternatives. For example, “...decide whether and how to protect them...” should be changed to “...decide how to protect them.” (Individual, Pleasant Ridge, MI - #2235.31100)

Public Concern: The Forest Service should evaluate the use of the word “natural” in describing roadless areas.

To describe such areas as “natural,” in the sense that they are uninfluenced by modern civilization, is factually incorrect. Roadless areas do continue to produce higher quality water than most roaded areas, but from a vegetation or wildlife viewpoint they have been completely transformed. Though they may be “wild,” most roadless areas are far from natural. (University Society, Arlington, VA - #43983.31100)

9.3 Contradictory Concepts

Many people who have perused the Draft EIS believe it contains certain statements and concepts that are contradicted elsewhere in the document. Citing the section on decommissioning roads, one elected official notes that these new unroaded areas will be evaluated for roadless characteristics and values. This public servant points out that elsewhere in the document it is stated that “the proposed prohibition on road construction would reduce roadless caused irreversible and irretrievable commitments to dispersed recreation activities in roadless areas.” If these commitments are irreversible, this official wonders, then how can the Forest Service evaluate these areas for roadless values? This person would like the Forest Service to address this contradiction.

The Forest Service should reconcile the difference between the issues identified in the abstract and those cited throughout the rest of the Draft EIS, according to another elected official. Others believe that the Forest Service should clarify the difference between responses and comments. Citing the 360,000 responses and 119,000 public comments received by the Forest Service, one person posits, “the Forest Service needs to either fix the number or define the difference between ‘responses’ and ‘comments.’”

Some respondents cite the contradiction between the proposed rule’s exception to no new roads granted by the 1872 mining law and the summary table’s statement that exploration costs would increase because no roads would be allowed. These people would like to know whether roads will be allowed for the purpose of mineral exploration. Additionally, one Nevada resident believes the Civil Justice Reform Act section of the Draft EIS “appears to be a blanket policy whereby your regulations will usurp our rights and laws at all levels.” This person believes the paragraph should be reworded so there is no question that the USFS intends to comply with other laws. Others believe the Forest Service should address inconsistent mileage estimates of road construction in the Draft EIS. A timber association proposes discrepancies between the Interior Columbia Basin Ecosystem Management Project’s estimate of impaired streams and those contained in the Draft EIS be corrected. The association believes initiatives suffer from a general lack of coordination and inconsistent data and should be cleared up in the Draft EIS to properly disclose the effects of the rule.

Public Concern: The Forest Service should address contradictions in the cumulative effects analysis.

P72 Cumulative Effects Third Paragraph. It is premature to state that physical and biological resources would benefit, especially since this statement appears to contradict the previous paragraph. P72 Cumulative Effects Third Paragraph “Adverse recreational and social and economic impacts could occur as a result of decreased motorized recreational opportunities...” (Individual, Beaumont, TX - #50613.31300)

Public Concern: The Forest Service should address contradictions in the Draft EIS regarding the evaluation of roadless characteristics and values.

In one statement the Forest Service says that “As roads are decommissioned, the resulting unroaded areas will be evaluated for roadless characteristics and values.” In another section, they state that “the proposed prohibition on road construction would reduce roadless caused irreversible and irretrievable commitments to dispersed recreation activities in roadless areas.” You can’t have it both ways--Irreversible means you can’t go back to the way it was. The first statement severely contradicts the second statement which is a legal conclusion of the agency. (County Elected Official, Elko, NV - #17274.31300)

Public Concern: The Forest Service should reconcile the differences between the issues identified in the abstract and those cited throughout the rest of the Draft EIS.

Page 1-6, issues discussion--The issues identified (public access, identification of unroaded areas, exemptions, local involvement, etc.) are inconsistent and extremely different from the opening-page Abstract (protecting clean water, biological diversity, dispersed recreation, wildlife habitat, etc.). Relief: The Forest Service must clarify why the issues are different between the two sections of the document. (County Elected Official, Worland, WY - #16185.33100)

Public Concern: The Forest Service should clarify the difference between responses and comments.

Page 1-5, 4th paragraph--States that "...the Forest Service received over 360,000 responses..." On the previous page it states that "The agency received approximately 119,000 public comments..." That's a difference of 222,000 responses or comments. Relief: The Forest Service needs to either fix the number or define the difference between "responses" and "comments." (County Elected Official, Worland, WY - #16185.44410)

Public Concern: The Forest Service should reconcile contradictory statements in the proposed rule regarding the right to build mining exploration roads.

The proposed rule says that certain limited exceptions to no new roads would include rights granted by the 1872 mining law. In the summary tables, however, it is stated that exploration costs would increase because no roads would be allowed. Without the right to build exploration roads, mining is essentially banned. Additional language within the document is also contradictory. (Individual, Elko, NV - #8087.93500)

Public Concern: The Forest Service should reword the Civil Justice Reform Act section of the Draft EIS.

Another item of real concern, in line with the above, can be found in your Civil Justice Reform Act on page A-24. This appears to be a blanket policy whereby your regulations will usurp our rights and laws at all levels. I'm sorry, but America is still a republic made up of 50 self-governing states with a binding Constitution. I don't believe it is or should be the intent of regulatory policy to circumvent established law. This paragraph should be reworded so there is no question that the USFS intends to stay within our laws. (Individual, Ely, NV - #10563.51000)

Public Concern: The Forest Service should address inconsistent estimates of road construction in the Draft EIS.

Pages 3-16 and 3-17 have inconsistent estimates of the amount of road construction in inventoried areas under the "no action" alternative--300 miles on page 3-16 and 1,444 miles on page 3-17. Please clarify in the FEIS. (Environmental/Preservation Organization, Eugene, OR - #43410.31200)

FIVE YEAR ESTIMATES FOR ROAD CONSTRUCTION AND RECONSTRUCTION IN INVENTORIED ROADLESS AREAS

Also, a correction may be warranted on page 3-16 where prohibition alternatives are discussed. Under Alternative 1 on page 3-16, the DEIS states that approximately 300 MILES of road construction and reconstruction is planned in inventoried roadless areas over the next five years. On page 3-17, a large figure, 1,444 MILES, is used to describe the same activity. Subsequent tables 3-4 and 3-5 support the larger figure. (State Agency, Olympia, WA - #17285.33300)

Public Concern: The Forest Service should clarify the discrepancy between the Interior Columbia Basin Ecosystem Management Project’s estimate of impaired streams and that contained in the Draft EIS.

The ICBEMP project states that eight percent of stream miles within the project area are water quality limited as defined by the Clean Water Act. And yet, the roadless proposal map on page 3-30 of the DEIS describes a much different water quality situation. Most of the ICBEMP area is shown as having 11 to 25 or greater percent impairment. Of course, all of this seems inconsistent with a recent report we have produced with the National Association of State Foresters, which demonstrates that water quality impairments due to forestry are drastically overestimated. Again, these initiatives suffer from a general lack of coordination and inconsistent data. Inconsistencies must be cleared up if the DEIS is to properly disclose the effects of the rule. (Timber Association, No Address - #52501.33300)

9.4 Identification of Specific Terms and Concepts

Several terms and concepts, while comprehensible, are not specifically delineated to the satisfaction of many readers. For example, the Draft EIS’s effects analysis should specify what types of uses will be prohibited in uninventoried roadless areas and other unroaded areas, according to one respondent. Another believes that the Forest Service should specify whether the word “treaty,” as used in the Draft EIS, refers to agreements with Native American Tribes or with international bodies.

Other concepts that need to be specifically identified, according to various citizens, are “controversial issues,” “threats to wilderness character,” “characteristics,” and “A-7 special designations.” However, one respondent, citing several undefined phrases on page S-14 of the Draft EIS, does not seek clarification but rather requests that the Forest Service delete these statements outright. One respondent believes that there are other categories that the Forest Service should consider under the Recreation Opportunity Spectrum.

Public Concern: The effects analysis in the Draft EIS should specify what types of uses will be prohibited in uninventoried roadless areas and other unroaded areas.

Prohibited uses in uninventoried roadless areas and other unroaded areas are not fully outlined in the effects analysis on 3-223 of the DEIS. (Individual, Kalispell, MT - #9973.70000)

Public Concern: The Forest Service should specify the referent of the word “treaty” in the Draft EIS.

Please specify when you use the word treaty whether you are referring to native American treaties or U.N. treaties such as the 1992 Biodiversity Treaty. (Individual, Sovey, MI - #670.31100)

Public Concern: The Forest Service should identify the controversial issues mentioned in the Draft EIS.

Quoting from the document, it was further stated that “the controversy surrounding roadless area management” would make the transaction costs high. Please explain what are the controversial issues surrounding the management of the roadless rule? Your EIS and the Summary did not offer any information on the subject or nature of what was the controversy. (Individual, Klamath Falls, OR - #10231.31100)

Public Concern: The Forest Service should specifically identify the “threats to wilderness character” mentioned on page 3-138 of the Draft EIS.

Page 3-138, second paragraph-- The discussion references threats to wilderness character. What are they? They are not specifically identified but simply identified as threats. Relief: The Forest Service must identify and disclose what these effects are. (County Elected Officials, Worland, WY - #16185.90240)

Public Concern: The Forest Service should identify A-7 special designations.

A-7 “Special designations” - what might these be? Their purpose? Will they be developed to complement other protected areas and enhance biodiversity protection? A spectrum of land use designations are needed to truly preserve biodiversity. (Individual, Leavenworth, WA - #15897.83400)

Public Concern: The Forest Service should delete undefined phrases on page S-14 of the Draft EIS.

Page S-14; In smaller unroaded areas, the local manager would determine if he would be reasonably able to conserve its roadless characteristics. Since the definition of “sensitive species that need their habitat protected,” “sensitive species that are different from threatened, endangered, and proposed candidate species with their habitat threatened,” are not defined, delete them. Delete “Landscape character and scenic integrity”. (Individual, Twain Harte, CA - #1632.32000)

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)

9.5 Requested Changes

Various individuals, groups, and government agencies offer specific Draft EIS wording and numerical changes for the Forest Service’s consideration. Such changes are offered to eliminate subjectivity, to be consistent with the language of the action alternatives, to reconcile perceived contradictions, or to provide better detail, according to these respondents. Several citizens seek clarity regarding information found in the Draft EIS, in tables and also on specific pages. Corrections to spelling and word usage in the text are also described here.

One individual requests that stock use be added to the list of allowed dispersed recreation activities. Respondents also state concern over appendices, suggesting that Appendix A be withdrawn from the DEIS. Suggestions for changes to definitions can be found in Section 9.6.

Public Concern: The terms “classified” and “unclassified” roads should be changed to “maintained” and “unmaintained.”

It is also very misleading to call roads “classified,” and “unclassified.” They should be called as they are, maintained, and unmaintained roads. (Wise Use Organization, Big Pine, CA - #6694.32000)

Public Concern: The Forest Service should replace the phrase “ensure consideration” with “ensure compliance with the rule” in item 2 of the proposed rule.

In item #2 of the proposed rule, I suggest replacing the phrase “ensure consideration” with “ensure compliance with the rule.” This helps eliminate subjectivity. (Individual, No Address - #3557.31100)

Public Concern: The Forest Service should replace the wording of “most restrictive” with “most protective” when describing Alternative 4.

Sometimes the DEIS says that alternative 4 is “most restrictive.” This is accurate but casts this alternative in a negative light. It would be better to say “most protective.” (Environmental/Preservation Organization, Eugene, OR - #43410.31100)

Public Concern: The Forest Service should change the statement “the proposed action would prohibit road construction and reconstruction in inventoried roadless areas” to “prohibit road construction and reconstruction in unroaded portions of inventoried roadless areas” in the Draft EIS.

The DEIS abstract states that the proposed action would prohibit road construction and reconstruction in inventoried roadless areas. Based on the language defining the action alternatives, however, we assume this is a misstatement, and should read “prohibit road construction and reconstruction in unroaded portions of inventoried roadless areas...” to be consistent with the language of the action alternatives and the intent of this initiative. (State Agency, Santa Fe, NM - #17300.31100)

Public Concern: The Forest Service should change the statement “no roads or trails would be closed because of the prohibitions” to “no classified roads would be closed because of these prohibitions” on page S-1 of the Draft EIS.

Another major contradiction occurs on page S-1, which states that no roads or trails would be closed because of the prohibitions. This statement should be changed to state that no “classified” roads would be closed because of these prohibitions. (State Agency, Santa Fe, NM - #17300.31100)

Public Concern: The Forest Service should change the phrase “of considerable length” to “of meaningful length” in Section 294.13(B)(2) of the proposed rule.

Section 294.13(B)(2) also calls for consideration of unroaded areas with a common boundary “of considerable length” with inventoried roadless areas, wild and scenic rivers, etc. Rather than of “considerable” length, it appears that a better description would be of “meaningful” length. Even a narrow common boundary may be critical where it is along a migration corridor or near a stream. (State Elected Official, Salem, OR - #18661.31100)

Public Concern: The Forest Service should combine the discussions of timber harvest on pages 3-112 and 3-182.

Why is the discussion of timber harvest split into two sections 70 pages apart starting on pages 3-112 and 3-182. (Environmental/Preservation Organization, Eugene, OR - #43410.31200)

Public Concern: The Forest Service should use the terms “scheduled” and “unscheduled” harvest when discussing the alternatives.

In discussing the alternatives that relate to “commercial timber harvest” we suggest you reference the term “scheduled” harvest to distinguish between “unscheduled” harvest and other activities. (County Agency, No Address - #16087.32100)

Public Concern: The Forest Service should modify the language of 36 CFR.

294.12

DEFINITION OF “UNROADED PORTION OF INVENTORIED ROADLESS AREA' MUST BE AMMENDED
The definition of “unroaded portion of an inventoried roadless area” should be changed to read: “a portion of an inventoried roadless area in which no classified road has been constructed since the area was inventoried.”
EXCLUSION IN SECTION (294.12(b)(3) MUST BE REVISED. Section 294.12(b)(3) should be revised to read: “A road is needed pursuant to reserved or outstanding rights or as permitted by statute, treaty or other authorities: or”.
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 Organization, Reno, NV - #15907.31100)

294.13

We therefore ask the USFS to include the following language (or comparable language) in Section 294.13 of the final Roadless Area Conservation Rule:

36 CFR 294.13 (Consideration of roadless area conservation during forest plan revision AND IMPLEMENTATION).

294.13(b)(3): At any time, a person may petition the Forest Service to classify lands in the NFS as “roadless” or “unroaded” under these regulations. Any such petition must be submitted to the Supervisor(s) of the NFS units in which the petitioned lands reside. The petition must include, at the minimum, the following information:

- (i) The name and address of the petitioner,
- (ii) A detailed map showing the boundaries of the petitioned area,
- (iii) A description of the area that informs the responsible official of the petitioned area's important characteristics, such as those listed in Section 294.13(a) of these regulations, and
- (iv) A map or maps showing any “roadless” or “unroaded” area boundaries identified in previous inventories that may overlap with or otherwise have relevance to the petitioned area, and The petition should also include, when appropriate, photographs or other supporting documentation to show that features (e.g., unmaintained roads) previously believed to disqualify the petitioned area from “roadless” or “unroaded” status may not disqualify the area for such status.

294.13(b)(4): When a responsible Forest Service official receives a petition submitted pursuant to Section 294.13(b)(3) of this rule, that official shall review the petition and supporting materials and make a determination on the “roadless” or “unroaded” status of the area. To assist the determination, the agency official may elect to visit the petitioned area or seek further information from the petitioner. Within 160 days of receiving a petition, the official shall then issue a written response to the petition explaining the official's determination. The response shall either grant the petition in whole, grant the petition in part, or deny the petition.

294.13(b)(5): Any determination on a petition submitted pursuant to Section 294.13(b)(3) of these rules shall constitute a finding of fact concerning the on-the-ground conditions of an area. As such, the determination on a petition shall not commit the agency to undertake any ground-disturbing activities that would have an adverse environmental impact or otherwise be subject to assessment under the National Environmental Policy Act or its implementing regulations. (Environmental/Preservation Organization, Laramie, WY - #43697.31000)

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 - #15907.31100)

Public Concern: The Forest Service should address the grammar and clarity of paragraph 294.13(a) in the Draft EIS.

The language under proposed par. 294.13 (a) does not appear grammatically correct and is not clear. How, for example, is soil a characteristic in itself? How can a “responsible official” evaluate just soil? Or “water” or “air”? What data and information will be needed in order to know, for example, the nature of “diversity of plant and animal communities?” And “habitat...”? And “landscape character and scenic integrity”? These “characteristics” also have to be evaluated for unroaded areas that may have non-classified roads; how can this be understood by responsible officials and done in a reasonable manner? This language does not explain exactly what is to be evaluated in the consideration of quality and importance of the “characteristics” ...This language does not follow proper syntax and semantics; it is ambiguous, elusive and impossible to accomplish with any degree of legal certainty. (County Elected Official, Yreka, CA - #13551.31100)

Public Concern: The Forest Service should use a hierarchical numbering system for the pages of Chapter 3.

Chapter 3 is long and would be improved by a hierarchical numbering system. (Individual, Oak Ridge, TN - #53014.33000)

Public Concern: The Final EIS should replace the term “dispersed recreation” with the more appropriate term “recreation setting.”

Primitive, semi-primitive non-motorized, and semi-primitive motorized classes of dispersed recreation: Comment: Within the recreation opportunity spectrum, “Recreation Setting” is the appropriate term instead of “Dispersed Recreation.” (Environmental/Preservation Organization, Asheville, NC - #43412.91200)

Public Concern: The Forest Service should clarify page S-36 of the Draft EIS.

S-36 Paragraph five is confusing and roughly worded. This needs to be put in plain language for the public. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should change “eliminating” to “eliminate” in the last paragraph of page 3-31.

3-31 Last paragraph. “...would completely ELIMINATING timber offering.” Grammatical error. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should clarify the heading of table 3-9 on page 3-51.

3-51 Table 3-9. Heading is confusing and should be clarified. The last column heading needs a comma after “wilderness,” or more work if that is not what is being expressed. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should reword “The largest would increase occurs in...” in the third paragraph of page 3-53.

3-53 Paragraph three. “The largest WOULD INCREASE occurs in the...” Reword. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should reword “precise estimates” on page 3-57 of the Draft EIS.

3-57 Paragraph three. “Precise estimates...” Oxymoron; should be reworded. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should use more than one example of beneficial stewardship activities on page 3-66 of the Draft EIS.

3-66 More than one example of beneficial stewardship activities need to be presented. This example is used five or six times; hopefully the agency has other programs such as this to use as examples. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should address typographical errors in paragraph two of page 3-137.

3-137 Paragraph two. “...to the NPWS; however...” Typographical error. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The forest service should reword the first sentence of paragraph five on page 3-141.

3-141 Paragraph five. This section is difficult to understand and should be reworded. The first sentence has grammatical errors that can be reworded. Replacing “result” and/or “from” may resolve this problem. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should reword or insert modifiers to the last sentence of the last paragraph on page 3-217.

3-217 Last paragraph. Last sentence of this paragraph needs rewording or the insertion of modifiers such as “most reasonable” and “that.” (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should add “harvest” to the end of “...which do not prohibit roading and timber” on page 3-325.

3-235 Paragraph five [(middle of page)]. “...which do not prohibit roading and timber [[harvest].]” Add word. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should correct the spelling of “old growth dependant” on page 3-236.

3-236 Paragraph five “...old growth DEPENDANT...” misspelling. (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest service should replace “certainty” with “certainly” on page 3-237.

3-237 Paragraph one. “Certainty, with...” Replace with “certainly.” (Individual, Leavenworth, WA - #15987.31200)

Public Concern: The Forest Service should correct Table 3-19 with regard to fire statistics.

Managing fire in areas without roads is significantly more costly and less likely to be effective than in roaded areas. In the west, my experience indicates that your Table 3-19 is incorrect (possibly due to lack of site specificity). Many roadless areas with which I am familiar are at High Risk from catastrophic fire. (Individual, McCall, ID - #19994.84200)

Public Concern: The Forest Service should add “recreation stock use” to the list of dispersed recreation activities.

I also note in the wording of the proposed rule which deals with the various opportunity classes and gives examples of the type of recreation activities that could take place within the inventoried roadless and other unroaded areas that there is no mention of horseback riding or other forms of recreational pack and saddle stock use. This apparent oversight should be corrected by adding recreation stock use to the list of dispersed recreation activities. (Individual, Eden, UT - 17735.31100)

Public Concern: The Forest Service should withdraw Appendix A from the Draft EIS.

We request that appendix A of this proposal be withdrawn. (Individual, Rock Springs, WY - #21756.33510)

9.6 Definitions

Numerous definitions contained in the Draft EIS require clarification or modification according to many respondents. Such concerns are contained in this section, which is divided into three subsections: 9.6.1 Road Definitions and Classifications; 9.6.2 Miscellaneous Definitions; and 9.6.3 Additional Definitions.

9.6.1 Road Definitions and Classifications

Several respondents feel that the Forest Service should reevaluate and clarify its definition of a road. Some people even go so far as to suggest that the definition is purposefully misleading. “If someone were to be skeptical they might think that it was to make it appear that there were far too many roads on the forest to maintain,” asserts one citizen. Others wish to have the 50-inch rule clarified. “What happens if it is 49 inches wide in one spot but much wider in most of the road?” queries one person. One respondent ponders on the meaning of “existing road.” Still others wonder why the Forest Service has ostensibly changed the definition of the term “road” from the one contained in the Wilderness Act. Tangentially, one Oregon resident believes that the Forest Service should reassess the use of the term “Forest Service Roads.” “These are not Forest Service Roads. These roads were built with public and private monies and managed by the Forest Service for the benefit and use of the American people,” proclaims this individual.

The distinction between “roads” and “trails” is blurred for many readers of the Draft EIS. Citing the definition of a road contained in the Forest Service Manual, one recreational organization proffers, “a horse trail could be a road.” Another respondent maintains that the definition of a road should be changed from 50-inches wide to 72-inches wide so that popular trails will not be decommissioned. “Many of the trails I have ridden are more than 50 inches wide yet are impassable for any vehicle other than a motorcycle or ATV,” this person contends.

Such recreational concerns are common. Many citizens believe that the Forest Service should clarify various road levels and trail designations. Citing the fact that there are multiple levels of trails and roads, one respondent recommends that “there needs to be some mention of the differences.” Yet another recreational forest user proposes that the Forest Service consider snowmobile trails as “winter roads.” Conversely, others are concerned that the Forest Service definition of “other vehicle travelways” may lead to a ban on snowmobile access. One California resident believes the Forest Service should expand the definition of road to include any travelway used by horses, bikes, vehicles, or pedestrians.

In addition to the definition of the term “road,” the definition of the classification “roadless” also elicits numerous requests for clarification and suggestions for improvement. Much like the road definition, some respondents believe the definition of roadless areas is purposefully misleading. “I believe that the word ‘Roadless’ has been redefined in such a way as to so confuse the general public with the result being that opinion polls have falsely indicated a favorable reaction to the proposed Roadless Initiative,” charges one individual. Others recommend that the Forest Service not use the term “roadless” for areas that contain existing roads. “If the roads aren’t maintained (which they aren’t) that doesn’t mean the road doesn’t exist,” observes one citizen. “If the roads exist the area isn’t roadless.” A County Official maintains that new definitions of “roadless”

conflict with guidelines applied in previous inventories and must be corrected. Other agencies state the definition of roads and roadless should comply with state and county definitions. One individual states that clearly defining boundary definitions of inventoried roadless areas could prevent the closing of areas which contain four-wheel drive roads. “Irreversible loss of roadless character” is another phrase in need of definition according to one respondent from Alaska. An environmental group from Wyoming suggests a very specific change to the definition of “roadless areas.”

Like the term “roadless,” “other unroaded areas” needs to be clarified, according to several respondents. “Designating other areas as ‘unroaded’ without defining them in regards to size, attributes, and other features should be dropped,” asserts one constituent. In addition, this respondent believes such a loosely defined term will only lead to more litigation. “Classified” and “unclassified” roads need to be better defined as well, many people contend. One self-identified outdoorsman believes that the Forest Service should determine whether the redefinition of many existing recreational roads and trails as “unclassified” will result in the closure of campgrounds and other recreational facilities.

The definition of “reconstruction” is unacceptable to some respondents who believe the current “wording will prevent repair and rerouting of trails and roads that is actually better for the environment.” In addition, the distinction between the “construction” and “reconstruction” of a road needs to be addressed in many respondents’ minds. In a slightly different twist, one citizen feels that the Forest Service should clarify the difference between rebuilding a road and road reconstruction. “Could rebuilding, to restore the road to its original condition, be classed as reconstruction?” ponders this person. Still other respondents question what “new” road construction entails. Several people also question the exact measures the Forest Service would consider “maintenance,” especially with regard to the actions the agency would classify as “reconstruction.” Additionally, some respondents request a definition of “decommission.”

Public Concern: The Forest Service should reevaluate and clarify its definition of a road.

Using the definition of a “road” as any throughway over 50 inches in width automatically excludes existing trails from consideration as “throughways” in these areas. (Individual, Valley Park, MO - #2201.32000)

I find the Forest Service roadless area proposal unacceptable. The definition of a road makes it sound like areas that have roads do not have roads. (Individual, Auburn, WA - #39.32100)

The current proposed definition of a road is, “a motor vehicle travelway over 50 inches wide, unless classified and managed as a trail.” The AMA has objected numerous times to this imprecise definition. Nearly every route, regardless if its travel type will at some point in its course broaden to more than 50 inches. A strict rule interpretation may mandate that some motorized trails be defined as roads, or more specifically, “unclassified” roads. Though not currently classified as trails these “unclassified” routes may in fact be important access routes to motorized trails. “Decommissioning” these routes would be a de facto closing of “classified” motorized trails. I demand the Forest Service clarify and publish all definitions, and consider each route based on its traditional and historic use. (Individual, Canon City, CO - #1103.32100)

The agency should abandon the unique and confusing definition of the term “road” and use the more reasonable and universal definition which already enjoys widespread acceptance. “Any way, travel way, two track, trail, path or

other means of approach, except those whose purpose is for foot traffic only as evidenced by NEPA documentation.” (i.e. the Appalachian Trail is a formally designated walking-only way). This publicly accepted definition is much more clearly understood by the 1.7 million visitors (and growing) who use these roads everyday. This definition was proposed within the out of court settlement agreement between the United Four Wheel Drive Association and the Forest Service in reference to this DEIS’s companion document, the NATIONAL FOREST SYSTEM ROAD MANAGEMENT STRATEGY, ENVIRONMENTAL ASSESSMENT and Civil Rights Impact Analysis, Dated February 9, 2000 which also restricted the use of the terminology and definitions of road, classified road, unclassified road, or unroaded in forest planning, project implementation outside roadless areas, or for road obliteration or closure purposes until the Forest Service subjects the definitions to public comment. The correct definition of a “road” is critical to the success of this management plan and the liberal definition applied appears to conflict with other management documents which is sure to cause more confusion and controversy. (Individual, San Diego, CA - #2876.32100)

THE DEFINITION IS MISLEADING

This proposed rule contains no definition for road, thus it is misleading and deceptive. This proposal will close existing roads, thus it is misleading and deceptive. (Individual, Cortez, CO - #10533.43000)

For some reason the Forest Service has decided to shrink a road to 50 inches. So how did this new definition come about and why? If someone were to be skeptical they might think that it was to make it appear that there were far too many roads on the forest to maintain. But we know that no one in the government would ever try to mislead the people. I don't think that its quite that devious but I do think that it's misleading at best and down right shameful that a term like road has been redefined. (Individual, Hayward, WI - #13914.42000)

CLARIFY THE 50-INCH RULE

The so-called “50 inch” rule, which distinguishes a motorized “road,” which is defined as over 50” and a motorized “trail,” which is under 50” wide, is a distinction without a difference. What part of the road do you measure? What happens if it is 49 inches wide in one spot but much wider in most of the road? What happens if excessive use makes a 40” trail wider than 50”? These questions are not addressed at all by the rule. (Environmental/Preservation Organization, Brookport, IL - #1505.32100)

Public Concern: The Forest Service should clarify the term “existing road.”

The Forest Service must clarify what is meant by the term “existing lease.” The DEIS states “construction and reconstruction of roads, considered reasonable and necessary for energy or mineral development on EXISTING LEASES, would also be allowed under the [proposed rule] as access necessary to fulfill the terms of the lease.” DEIS at S-39. NWMA [Northwest Mining Association] strongly agrees that existing leases should not be impacted by this rulemaking, but confirmation is necessary as to what constitutes an existing lease. Legally, the lease should be considered “existing” upon lease issuance, as that is the time when a contract between the United States and the lessee is entered into. This is in contrast to an existing operation, which is any activity after mining is approved to commence. Such a distinction is vitally important. First, at the time of lease issuance, the lessee could not have anticipated anything as outrageous as this roadless initiative. And second, it would be patently unfair to impose such new conditions on the contract at the time mining operations commence. Failure to acknowledge these facts could expose the USFS to costly litigation. (Mining Company, Spokane, WA - #16091.31100)

Public Concern: The Forest Service has changed the definition of the term “road” from the one contained in the Wilderness Act.

There are roads now in so-called roadless areas and you are changing the definition of a road under the one you have applied in the past under the Wilderness Act. (Individual, No Address - #8554.32100)

Public Concern: The Forest Service should reassess the use of the term “Forest Service Roads.”

I am concerned about the philosophical shift reflected in the proposal to adopt the term “Forest Service Roads”. These are not Forest Service Roads. These roads were built with public and private monies and managed by the Forest Service for the benefit and use of the American people. (Individual, Klamath Falls, OR - #13672.93610)

Public Concern: The Forest Service should recognize that any travelway used by horses, bikes, vehicles, or pedestrians is a “road.”

Any travelway used by horses, bikes vehicles or pedestrians is a road. (Individual, Spring Valley, CA - #9729.32100)

Public Concern: The Forest Service should define “trail.”

The proposed definition of “road” in section 294.11 defines it as a motor vehicle travel-way over 50 inches wide, unless classified and managed as a trail. The proposed rule contains no definition of a trail. Is that reference meant to refer to a forest development trail as defined in 36CFR #261.2? (Individual, Denver, CO - #29016.32200)

Public Concern: The Forest Service should clarify the distinction between “roads” and “trails.”

Roads versus trails definitions need help for us all in management. (Individual, Grand Rapids, MN - #671.32000)

We need to have a trail-whether developed from a single-track footpath or from an old logging road. By your own definition in The U.S. Forest Service Forestry Handbook, Second Edition a road is “an open way for passage of vehicles, persons and animals, a path, course.” Therefore, a horse trail could be a road. (Recreational Organization, Knoxville, TN - #6914.71300)

Public Concern: The definition of a road should be changed from 50-inches wide to 72-inches wide so that popular trails will not be decommissioned.

I am also concerned about the stated definition of road. 50 inches is not wide enough. Many of the trails I have ridden are more than 50 inches wide yet are impassable for any vehicle other than a motorcycle or ATV. I have assisted the Forest Service in the past with trail maintenance. The blade on the trail tractor used is very close to this measurement. It is my concern that many of the trails I ride would be defined as roads and subject to decommission. I would suggest a path greater than 72 inches be considered a road. (Individual, Chatsworth, CA - #6329.32100)

Public Concern: The Forest Service should clarify various road levels and trail designations.

Where will the “unclassified” trails for four wheeling fall? And also for motorcycles? ... Can RS2477 be used for existing “unclassified” roads? Motorcycle trails are not so wide, where do they fall? Some people like difficult roads (four wheeling) and (motorcycles) for a challenge, where do these roads fall? (Individual, Tucson, AZ - #1394.32000)

There are multiple levels of roads; from hiking trails to single track, to unimproved dirt roads, to paved roads. There needs to be some mention of the differences. The terminology should reflect the true meaning and in plain, understandable English. (Individual, Arvada, CO - #5669.32000)

Public Concern: The Forest Service should consider snowmobile trails as winter “roads.”

Please also consider snowmobile trails as winter “roads.” (Individual, Salt Lake City, UT - #6740.32100)

Public Concern: The Forest Service should clarify the definition of “other vehicle travelways.”

Another definition of road is, Other Vehicle Travelway--A travel route for NON-standard passenger vehicles which has not been mechanically constructed or improved and is not maintained. This designation may also apply to those older routes, where because of the passage of time, man’s work is no longer substantially noticeable. “Other vehicle travelways” typically have been developed over time through use, and are described as “ghost roads.” Snowmobiles and Sno-Cats may be banned due to this definition and no mention of emergency off highway vehicle use is applied. This definition also brings to bear Revised Statute 2477. (Wise Use/Land Rights Organization, Rock Springs, WY - #2866.32000)

Public Concern: The Forest Service should clarify the definition of the classification “roadless.”

The classification ‘roadless area’ means that there is no well-maintained road in the area. It does not mean that there should be no roads or trails in the area. (Individual, No Address - #5673.71300)

By looking at maps and whatnot on the roadless web site, I can only hold my breath. In regards to the confusion whether roadless does mean “vehicles prohibited” or to mean, no further maintenance available...is quite confusing to the reader. (Individual, Dover, MN - #7663.32100)

I took a look at the proposed maps. At first glance, the whole “roadless” proposal looks harmless enough. However, when we as a Nation can’t decide what the definition of “is” is, how are we to know what the definition of “roadless” is. Are “roads” considered to be something covered with asphalt or at least gravel? Are they something maintained and 20 feet wide? I read that “provisions for firefighting will be maintained.” To me, that reads, “Yes there will be two track Forestry Roads, but you, the proletariat, will be locked out.” Is this the bottom line? If it is, then say so. Is Government Double-speak in use? (Individual, No Address - #2066.31300)

THE DEFINITION IS MISLEADING

I believe that the word “Roadless” has been redefined in such a way as to so confuse the general public with the result being that opinion polls have falsely indicated a favorable reaction to the proposed Roadless Initiative. (Individual, Challis, ID - #8518.32000)

INVENTORIED ROADLESS AREAS, UNROADED AREAS, AND CLASSIFIED ROADS

The Forest Service needs to clear up the confusion over the relationship between inventoried roadless areas, unroaded areas, and classified roads. Roadless areas should be defined to include: all previously inventoried roadless areas except those that have subsequently been deliberately roaded by the Forest Service; and similarly undeveloped lands (including small areas adjacent to designated wilderness and inventoried roadless areas) that were passed over in prior inventories or have subsequently been added to the National Forest System. Additionally, unroaded areas should be defined as tracts with more than 1,000 acres of contiguous land that is generally free of

roads suitable for standard (2-wheel-drive/low-clearance) highway vehicles. Further, the definition of “road” must clearly differentiate a road from a motorized or non-motorized trail “on-the-ground.” In other words, anyone should be able to look at a route and know if it is a road, a motorized route or a non-motorized trail. The old definition of a road was: “a general term denoting a way for purposes of travel by vehicles greater than 50 inches in width.” This definition comes from FSH 7709.54 and does not refer to trails, which are defined separately. It is intended for identifying roads on the ground. The new definition is: “a motor vehicle travelway over 50 inches wide, unless classified and managed as a trail. A road may be classified or unclassified.” The key difference here is that in the new definition, the Forest Service has changed from a travelway for VEHICLES greater than 50 inches, to a TRAVELWAY greater than 50 inches. (Recreation Organization, Missoula, MT - #17896.32000)

Public Concern: The Forest Service should not use the term “roadless” for areas with existing roads.

Please stop using the term “roadless” to describe areas that contain my family’s recreational roads and trails. (Individual, Lakewood, CA - #105.32100)

I have used the trails in Cache National Forest for 60 years. I can’t see how the area can now be termed “Roadless”. If the roads aren’t maintained (which they aren’t) that doesn’t mean the road doesn’t exist. If the roads exist the area isn’t roadless. (Individual, Logan, UT - #5638.32100)

Public Concern: The Forest Service should address conflicts between the proposed definition of roadless and the guidelines used for previous inventories.

New definitions of “roadless” are proposed which conflict with the guidelines applied in the previous inventory process. This has led to much confusion about the proposal and the DEIS publicly, on a local ranger district level, and in regional forest service offices. A process for correcting these inadequacies must be provided. (County Elected Official, Markleeville, CA - #16277.31300)

Public Concern: The Forest Service definition of roads and roadless should comply with state and county definitions.

The general public at large has not experienced first hand the phenomenon of the redefinition of road by the USFS. This definition flies in the face of State and County governments. Wyoming Statute 24-3-201 (attached), in part says that the legislature finds that due to inaccurate and inconsistent records, there exists roads which are seldom used, not maintained and are not identified as or believed by the public to be county roads but are, in fact, county roads. The USFS in site-specific occasions may not be consistent with some State law in reference to the term “roadless.” (Wise Use/Land Rights Organization, Rock Springs, WY - #2866.32100)

Public Concern: The Forest Service should set clear boundary definitions for inventoried roadless areas.

I feel that the boundary definitions of the inventoried roadless areas are not being set in a very practical way. At least here in Arizona, my impression is that “sort of roadless” is being called “roadless” with the results that 4WD trails in that area are being closed. (Individual, Tucson, AZ - #13317.32100)

Public Concern: The Forest Service should define “irreversible loss of roadless character.”

In chapter 3, page 11, the Forest Service needs to define “irreversible loss of roadless character”. (Professional Association, Anchorage, AK - #43416.33300)

Public Concern: The Forest Service should modify its definition of inventoried roadless areas in Section 294.11 of the proposed rule.

We request that the agency change definition of “Inventoried roadless area” in Section 294.11 of the Rule to read as follows: “Inventoried roadless areas: Undeveloped areas that were classified or inventoried as “roadless” in the Forest Service's Roadless Area Review and Evaluation (RARE II) process, forest planning, or subsequent assessments or Forest Service determinations. Roadless areas shall typically be at least 1,000 acres in size, though smaller areas may be classified as “roadless” under this Rule where the Forest Service determines such areas have important values that warrant such classification. For a given unit of the National Forest System, the locations of these areas shall be identified in a set of maps maintained in the Supervisor's office of the unit in question.” (Environmental/Preservation Organization, Laramie, WY - #43735.32000)

Public Concern: The Forest Service should define the terms “unroaded” and “other unroaded areas.”

All “other unroaded areas” are not defined and make decision making difficult. I feel these areas may be a major part and should not be included. (Individual, Flagstaff, AZ - #917.32000)

To add to the level of misunderstanding, the Forest Service is also using three differing definitions of “unroaded” within the three rule proposals. The definitions provided in the Roadless EIS and the Road EA each differ and vary from the overarching Forest Service Manual definition. We question whether all of these “unroaded” areas, depending on the definition, will eventually be considered in the Roadless proposal. Under the rule proposals of ICBEMP and the EA, additional lands will be ruled “unroaded” and roadless in the future, thus drastically increasing the amount of lands that are presently not considered under the Roadless proposal. The Forest Service apparently recognizes this effect, as it understands generally that the three proposals are “closely related.” (State Elected Official, Helena, MT - #19289.31300)

The Agency needs to clearly define “unroaded characteristics.” (Professional Association, Bethesda, MD - #51146.32100)

CUMULATIVE IMPACTS OF THE NATIONAL ROAD MANAGEMENT STRATEGY We have concern over the impacts of additional “unroaded” areas as defined in the National Forest system Road Management Strategy which were not fully analyzed as part of the DEIS. Forest Service Manual (FSM) 7710-Transportation Atlas, Records, and Analysis-Federal Register, Vol. 65.No 43, Friday, March 3, 2000, Notices, page 11691, Item 2 (a) (2 & 3) defines “unroaded” areas. In accordance with the proposed revision: “Unroaded portions of roadless areas identified in existing land and resource management plans that lie one-quarter mile or more beyond any existing classified road, and”... “ Unroaded areas of more than 1000 acres that are contiguous to remaining unroaded portions of RARE II inventoried roadless areas or contiguous to areas inventoried in land and resource management plans, contiguous to congressionally designated wilderness areas or Federally-administered components of National Wild and Scenic River System classified as Wild, or contiguous to unroaded areas of 5000 acres or more on other Federal lands. These areas of 1000 acres or more must have a common boundary of considerable length, at least one-quarter miles width, and provide important corridors for wildlife movement or extend a unique ecological value of the established inventoried area. Road construction in roadless and “unroaded” areas and generally reconstruction in those areas will constitute a significant environmental effect and will require the preparation of an environmental impact statement.” Page 2-2 of the Roadless Area Conservation DEIS defines “unroaded” areas as “areas without the presence of classified roads, which are of a size and configuration sufficient to protect the inherent characteristics association with their unroaded condition. These areas have not been inventoried and are therefore separate from inventoried roadless areas” (emphasis added) (State Elected Official, Helena, MT - #19289.72220)

THE DEFINITION WILL INCREASE LITIGATION COSTS

Designating other areas as “unroaded” with out defining them in regards to size, attributes, and other features should be dropped. The loosely defined “unroaded” will be a nightmare for managers to define, and requires additional needless analysis. Present F.S. NEPA analysis and all of the ESA requirements are more than adequate to protect these areas. Making “unroaded” areas will only increase the expensive litigation. The idea that if roads are decommissioned into an area that the area becomes “unroaded” is ridiculous. This will only discourage managers from decommissioning roads for fear that extra constraints will be put on the area. (Individual, McCall, ID - #7575.71100)

Public Concern: The Forest Service should clarify the definition of the term “classified road.”

I believe you have gone too far with your roadless proposal. The definition of what is classified as a road is too ambiguous. Roads that have been open for 30+ years could be closed. I do not support this initiative. (Individual, Phoenix, AZ - #1763.32100)

The definition of a classified road under 294.11(1) should specifically include RS2477 roads. The definition should be expanded to roads that are PLANNED OR MANAGED, OR USED for motor vehicle access. (County Elected Official, Fallon, NV - #17290.32100)

Public Concern: The Forest Service should determine whether the redefinition of many existing recreational roads and trails as “unclassified” would result in the closure of campgrounds and other recreational facilities.

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

Public Concern: The Forest Service should reevaluate its definition of “reconstruction.”

The definition of reconstruction is unacceptable. The wording will prevent repair and rerouting of trails and roads that is actually better for the environment. The intent may not be so but anti-access groups will use the way these are worded to stop multi-use trail projects. (Individual, Auburn, WA - #39.32100)

Section 294.11 (3) REBUILDING This Section is unduly restrictive. It appears that it would apply to a classified road that is currently being utilized below its service level. The definition makes no distinction between classified and unclassified roads. The proposed rule needs to make clear that the definition of ROAD CONSTRUCTION, ROAD MAINTENANCE, AND ROAD RECONSTRUCTION do not apply to classified roads other than Forest Service Roads. (County Elected Official, Fallon, NV - #17290.32100)

Public Concern: The Forest Service should clarify the distinction between “construction” and “reconstruction.”

There has to be a clear definition between “construction” and “reconstruction” of roads. ...I hope the Forest Service takes these considerations into account and the communities this will affect. (Individual, Spokane, WA - #5481.32000)

Public Concern: The Forest Service should clearly define “new” road construction.

When I read that the Draft Roadless Plan calls for no new road construction within inventoried roadless areas of 5,000 acres or more, I wonder what this means. It really depends on what the meaning of the word “new” is. (Individual, Billings, MT - #16957.31300)

Public Concern: The Forest Service should clarify the difference between rebuilding a road and road reconstruction.

On page S-7, you have defined “construction & reconstruction” (ending with the catchall phrase “but not limited to,”). Could rebuilding, to restore the road to its original condition, be classed as reconstruction? You need to change reconstruction to “altering”. (Individual, Arvada, CO - #5669.32000)

Public Concern: The Forest Service should clarify the definitions of “reconstruction” and “maintenance.”

The DEIS does not provide a clear definition as to the maintenance of these existing roads which are allowed to continue supporting existing activities. The definitions of “reconstruction” and “maintenance” are ambiguous and lead to confusion as to the intent of the proposed rule. The “...act of keeping fixed assets in acceptable condition...” which is an acceptable maintenance activity is easily construed to be a “rebuilding” activity which is prohibited. (Individual, San Diego, CA - #2876.32100)

Public Concern: The Forest Service should clarify the definition of the term “maintenance.”

You acknowledge the existence of roads within the “roadless areas,” and under alternative #2, that they will remain open. How will you define maintenance of these existing roads and trails? (Individual, Arvada, CO - #5669.32000)

Public Concern: The term “decommission” should be defined in the document.

What does “decommissioned” mean? It's not listed in the glossary of the Roadless Area Conservation Guide. If you “decommission” a “classified road”, does it become an “unclassified road”? Or does it become a road that prohibits travel by off-highway vehicles? (Individual, Tijeras, NM - #2993.32100)

9.6.2 Miscellaneous Definitions

A few of the definitions respondents wish to have clarified pertain only to their usage within the context of the proposed rule. For example, an individual requests that the Forest Service define the term “valid” as it pertains to access to public or private land within roadless areas. Some respondents would like the Forest Service to define “valid existing rights” and others would like a definition of “existing lease.” A similar request is made by a resident of Washington State. This person asks the Forest Service to define what “essential management” means in terms of exceptions to roadless area incursions. Yet another respondent requests a definition of “stewardship” in the context of the proposed rule’s prohibition of timber harvest except for stewardship purposes. An individual believes the Forest Service should define “impairment” as it relates to watersheds. Another respondent would like to see the definition of “huge” as it relates to the quote on page 3-126 of the Draft EIS, “HUGE numbers of people who hike the Appalachian Trail.” Three hundred hikers a year does not fit this respondents definition of huge. Conversely, a county official believes the Forest Service should define threatened, endangered, proposed, and sensitive species.

Others wish to add criteria to existing definitions in the proposed rule. One person feels that the Forest Service should include recreational and timber harvest access in the proposed rule’s definition of “vital access.” A wise use organization suggests the Forest Service define “protect,” as it is used numerous times throughout the Draft EIS. A timber association observes various definitions of “protection” can render many of the public comments meaningless or at least open to various subjective determinations as to their meaning. Similarly, another respondent asks that the Forest Service include people who use paper or live in wooden houses in its definition of “stakeholders.” Additionally, one person wishes to see the Draft EIS rewritten to recognize and identify small entities as having the same meaning as small business, small organization, and small governmental jurisdiction pursuant to the Regulatory Flexibility Act.

On an unrelated note, a wise use organization requests a clarification of the concept of a standard passenger vehicle. “The definition of standard passenger vehicle could in the future preclude service utility companies’ access on or across lands necessary for energy and communication distribution that allows our county to function and prosper,” this group ventures. “The ability to fight fires also would appear to enter into this designation as would search and rescue crews’ ability to effect their role in our forests.” Along the same lines, other respondents seek clarity regarding “off-road” and “off-highway” vehicles.

Public Concern: The Forest Service should define the term “valid” regarding access to public or private land within roadless areas.

Please define the term VALID when used to describe access to public or private land within roadless areas.
(Individual, Sovey, MI - #670.32000)

Public Concern: The Forest Service should clarify the definition of “valid existing rights.”

The term “valid existing rights” is not clearly defined. The DEIS discussion on pages 3-140 and 3-141 is so broad and general that there can be no meaningful comment. Litigation over R.S. 2477 road designations and access to easements for ditches, canals, and pipelines is bound to result from this grossly inadequate analysis. (Business, Dillon, MT - #29016.32000)

Public Concern: The Forest Service should modify its definition of “existing lease” in the Final EIS.

The Forest Service did not adequately define the term “existing lease.” A lease is considered “existing” at the time of its issuance as opposed to the time when activity is approved to commence. (Business, No Address - #52032.32000)

Public Concern: The Forest Service should define what “essential management” means in terms of exceptions to the roadless areas.

What does “essential management” mean in terms of exceptions to the roadless areas? (Individual, Bellingham, WA - #3971.32000)

Public Concern: The Forest Service should define the term “stewardship.”

In reference to the question that asks how does prohibition of timber harvest except for stewardship purposes under alternative 3 differ from prohibition of all timber harvest under Alternative 4? I have a number of comments. First of all, it would be helpful to define “stewardship” as used in this context. (Individual, Moses Lake, WA - #718.64000)

Public Concern: The Forest Service should define the term “impairment” as it is used to describe watersheds.

The statement is made that “the percentages of impaired stream miles within the watersheds are noted, but this does not imply that the impairments were the result of activities on NFS lands within the watersheds. Of the 533 watersheds with impaired waters, 356 have between 1% and 10% impairment, 146 have between 11% and 25% impairment, and 31 have greater than a 25% impairment.” It is impossible to say what this paragraph actually means. “Impairment” is not defined anywhere, nor how much stream impairment is actually tolerable within watersheds. (Individual, No Address - #52489.33300)

Public Concern: The Forest Service should define the term “huge.”

I'd like to see your definition of “huge.” Reference page 3-126, HUGE numbers of people who hike the Appalachian Trail. Only 5300 people have hiked the entire AT since its inception in 1968. I believe about 300 people a year currently hike the AT. This is certainly not my definition of huge. (Individual, Summerdale, PA - #29543.33300)

Public Concern: The Forest Service should define threatened, endangered, proposed and sensitive species.

Page 3-92, second paragraph--Threatened, Endangered, Proposed, and Sensitive Species need to be defined. None of these terms can be found in the glossary. In addition, there is no reference where the species in Appendix C reside locally--identification of Forest Service regions is lacking specificity. RELIEF: The Forest Service must define these terms and include them in the glossary. Also, Appendix C must disclose the counties where these species may be found. (County Elected Official, Basin, WY - #43980.32000)

Public Concern: The Forest Service should include recreational and timber harvest access in the definition of “vital access.”

There is language in the DEIS allowing for evaluation of road ‘decommissioning’ and prohibition of reconstruction where vital access is not a factor. Vital access, however, is not adequately defined, and should include recreational access (including OHV use) and timbering access for reduction of fire hazard and disease control. (Individual, Littleton, CO - #134.32000)

Public Concern: The Forest Service should define the word “protect.”

The term “protect” is widely used in the DEIS yet is not defined. An elevation of the full range of protection implications is required. Protection from fire, insect disease is not sufficiently addressed. Therefore USA-ALL recommends the adoption of Alternative I, the No Action alternative. (Wise Use Organization, Salt Lake, City, UT - #16190.32000)

The Forest Service left an important term undefined. While a list of definitions was distributed to the public at the “listening sessions” and other public meetings, the term “protection” remained undefined. This is an important omission, since to some people the active management techniques generally associated with commercial timber production are “protective” activities with respect to insect and disease control and fire management. The point could also be made that all areas within the National Forest System are “protected” by virtue of their inclusion in the NFS (i.e., they are protected for multiple use forest purposes and cannot be converted to non-forest land use). Thus, in the absence of a definition of “protection,” the Forest Service cannot know with any degree of certainty what a particular commenter might mean by saying he or she wants roadless areas “protected.” Without a definition of the term “protection” many of the public comments received by the agency were rendered meaningless or at least are open to various subjective determinations as to their meaning. (Timber Association, Ketchikan, AK - #43609.32000)

Public Concern: The Forest Service should include people who use paper or live in wooden houses in the definition of “stakeholders” on page S-39 of the Draft EIS.

Page S-39; “Stakeholders” are defined as those with the strongest interests on NFS lands. Add people who use paper and/or live in wooden houses to “stakeholders” with the strong interests in NFS lands. (Individual, Twain Harte, CA - #1632.90000)

Public Concern: The Draft EIS should include all definitions of small entities contained in the Regulatory Flexibility Act.

The DEIS must be rewritten to recognize and identify small entities as having the same meaning as small business, small organization and small governmental jurisdiction pursuant to the Regulatory Flexibility Act of the Small Business Regulatory Flexibility Enforcement Fairness Act. Small governmental jurisdiction means governments of cities, counties, towns, townships, villages, school districts or special districts, with a population of less than 50,000. Almost all of the communities, towns, cities and counties in the affected area of this proposed Roadless Conservation Area policy meet his definition. (Business Association, Beaverton, OR - #52230.55400)

Public Concern: The Forest Service should clarify the definition of user vehicles.

STANDARD PASSENGER VEHICLE

According to the USFS, “Roadless area” is literally an area without any “improved” roads maintained for travel by standard passenger type vehicles. This seems to meet the intent of the Service to further their quest of de facto wilderness area extensions. It is interesting to note the Draft Criteria (June 16, 1999) for the Intermountain Region, used by the USFS in Region 4, for the definition of standard passenger vehicles, is contradictory at best. It states, “A standard non-modified, street legal vehicle greater than 50 inches in width which is designed for travel on paved or maintained gravel surfaces. Typically envisioned are four-door sedans, station wagons, minivans and other vehicles found on city streets and highways, which have not been modified for off road travel or extreme road conditions. Because vehicle types have changed over time,” (and this is the contradiction), “sport-utility vehicles, light trucks and regular trucks would also be considered standard passenger vehicles. The presence or absence of 4-wheel drive should not be an indicator of whether a vehicle is a standard passenger vehicle due to the prevalence of this feature on most vehicles of all types.” Industry standard for light-truck parts sales carries the size of the vehicle through the 1-ton category, including the new Ford Superduty 4x4 class of light-truck. The question then remains what is the definition of “regular trucks”? This definition is contrary to Original Equipment Manufacturers (OEM) designs of 4-wheel drive vehicles which are not modified but are originally equipped to also navigate under extreme conditions. Interstate and intrastate paved roads at times experience extreme road conditions. The definition of standard passenger vehicle could in the future preclude service utility companies access on or across lands necessary for energy and communication distribution that allows our county to function and prosper. The ability to fight fires also would appear to enter into this designation as would search and rescue crew’s ability to affect their role in our forests. (Wise Use/Land Rights Organization, Rock Springs, WY - #2866.32000)

OFF-ROAD/OFF-HIGHWAY VEHICLE

The terminology of “Off-road vehicle” must be better defined. Specifically, differences between OHVs, ORVs, and ATVs needs to be clarified. (Individual, Chapel Hill, NC - #52231.91612)

Just the definition of what is or is not a road is not adequate. The term “off-highway” for travel and vehicles is mixed with “off-road”. The term off-highway should be every established trail or road, many of which are not “maintained”. (Individual, Tucson, AZ - #25227.32100)

9.6.3 Additional Definitions

Several terms used throughout the document are not familiar to certain respondents. The terms “non-attainment,” “even-aged,” “shelterwood,” “potentially isolated,” and “seed tree” should all be defined in the Final EIS, according to some. Additionally, one citizen feels that the Forest Service should include “recreation” in the glossary. Similarly, one elected official exhorts the Forest Service to define all the acronyms used in the Draft EIS and include them in the glossary.

Respondents also request definitions for terms dealing with hazardous situations, such as “wildland” and “imminent”.

Public Concern: The Forest Service should define the term “non-attainment” in the Draft EIS.

Comment: Page 3-44, fifth paragraph-- It is certainly not apparent to most readers what a “non-attainment” area is. A definition is not provided in the text or in the glossary. Relief: The Forest Service must define these terms and add them to the glossary. (County Elected Official, Worland, WY - #16185.32000)

Public Concern: The Forest Service should define the terms “even-aged,” “shelterwood,” and “seed tree.”

Comment: Page 3-114, last paragraph-- Terms such as “even-aged, shelterwood, and seed tree” need to be defined for the reader. They should also be included in the glossary. Relief: The Forest Service must include these terms in the glossary. (County Elected Official, Worland, WY - #16185.32000)

Public Concern: The Forest Service should include “recreation” in the glossary of the Draft EIS.

Glossary of Road Terms does not cover or include recreation as a definite term. (Individual, Tucson, AZ - #1394.32000)

Public Concern: The Forest Service should clearly define “potentially isolated” areas.

“Potentially isolated” areas; what is this referring to? It is quite unclear as written. In addition, they represent a very small proportion of the ITAs. Is this important enough to discuss in such painful detail? (Individual, Leavenworth WA - #15897.31100)

Public Concern: The Forest Service should define all acronyms used in the Draft EIS.

Comment: Page 3-31, first and fourth paragraphs-- The average reader will have no idea what TMDL's are. These bureaucratic acronyms and abbreviations need to be defined in the glossary as well as defined the first time they are used in each section of the document. Relief: The Forest Service must define these terms and include them in the glossary. (County Elected Official, Worland, WY - #16185.32000)

Public Concern: The Forest Service should remove the term “wildland” from the Draft EIS.

The term “wildland” is referenced many times throughout the DEIS. Yet, there is no definition for this term, even in the DEIS glossary, this term should be removed not only from the DEIS but also from any other support documents. (Mining Organization, Reno, NV - #15907.31100)

Public Concern: The Forest Service should clarify what constitutes “imminent”.

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; Comment: There should be clarification about what constitutes “imminent”. Does this mean the fire is actually burning, or only a high fire condition index? (Environmental/Preservation Organization, Asheville, NC - #43412.31100)

9.7 Adequacy of Maps, Tables, Figures, and Appendices

Numerous respondents exhort the Forest Service to make its maps clear and accurate in the document and on the web. The maps lack sufficient detail to accurately determine the boundaries of roadless areas, according to one recreational organization. The Forest Service should update maps to include uninventoried unroaded areas and wilderness areas. Others believe the Forest Service should provide legible maps with a larger scale. Proclaiming that the maps in Volume 2 of the Draft EIS “are impossible to review,” a business representative attests that such a lack of clarity is “probably deliberate to further obfuscate the damage you are doing to the people and land of the western United States.” While not insinuating a conspiracy, one person does point out that the maps provided on the internet do not match the Forest Service’s GIS coverage.

Questioning the veracity of current maps, other respondents request that the Forest Service create accurate, up-to-date maps and acreage calculations of the unroaded portions of inventoried roadless areas. Additionally, several people ask that the Forest Service map the location and size of every roadless and unroaded area before proceeding with the proposed rule.

One Utah resident, citing a similar concern to the aforementioned internet maps, requests that the Forest Service reconcile the large discrepancy in the number of acres of inventoried roadless areas on the Intermountain Region web site with that on national forest maps. The accuracy of the Inyo National Forest maps in Volume 2 of the Draft EIS is also called into question by some. The Forest Service should also clarify the table of contents for Volume 2 of the Draft EIS. Another specific question of clarification involves the northern-most portion of the Badger-Two Medicine area of the Lewis and Clark National Forest. One respondent wishes to know whether this area is considered an “inventoried roadless area” on the roadless Draft EIS map. An individual requests the forest Service improve the shading in figure 3-17 so the map and legends match. The Forest Service should make the graphics in the Draft EIS easier to read.

A related concern for some respondents is the determination of mining permissive tracts in the Draft EIS maps. “Using a single map of an entire geographic region of multiple states showing permissive tracts of undiscovered mineral deposits 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,” an individual proffers.

The tables designed to elucidate the Draft EIS’s proposals elicits comments from some readers of the document. Since many tables contain wording such as “may cause” and “could increase,” some respondents suggest that the tables should exclude such terms and include scientifically based, definitive language. Citing a similar concern, one elected official believes that the Forest Service should modify tables 2-2 and 2-3 to include all information disclosed in Chapter 3 of the Draft EIS. “The table comparing the alternatives and environmental consequences provide an incomplete comparison by omitting certain sections analyzed in Chapter 3, Environmental Consequences. This leads to potential errors in interpreting the full effects of each alternative,” this individual asserts. Additionally, there is some confusion over Table 3-20 regarding percentages of areas at risk to wildfires.

This same official also proposes that the Forest Service clarify discrepancies between table 2-2 and page 3-76 of the Draft EIS. “On Page 3-76, a reference is made to a 33% reduction in timber harvest levels over other alternatives. A review of Table 2-2 indicates this reduction is 66%,” this person posits. “This represents a 50% increase in harvest level reductions.”

Citing a recently published forest plan revision for the Medicine Bow National Forest, one timber association representative requests that the Forest Service reconcile the discrepancy between the number of roadless area acres stated in the plan revision with the number presented in Appendix B. “Our conclusion is that even though the proposed rule is supposed to apply to only the ‘unroaded portions of inventoried Roadless Areas,’ in fact, the acreages in Appendix B include ‘roaded portions of inventoried roadless areas’ as well.”

Public Concern: The Forest Service should make its maps clear and accurate.

Your maps in Volume 2 are impossible to review. Poorly presented and probably deliberate to further obfuscate the damage you are doing to the people and the land of the western United States. Be sure to change your Project Website Maps so as to better inform the public of your onerous intentions. (Business, Boise, ID - #75.44210)

The adobe maps you have for download do not match your GIS coverages. The Oregon sand dunes area in the Siuslaw has very little protection, and shouldn’t be left out of the adobe maps...it’s in the roadless coverage. Also the adobe maps of the Maiden peak/Waldo lake roadless areas are not matching. The adobe maps don’t represent all of the areas, they leave out sections which the GIS roadless coverages shows. Please fix these areas. (Individual, Portland, OR - #404.44230)

Given the significant number of acres, the disparate types of terrain, tract sizes and locations involved, the maps included with the DEIS lack sufficient detail to accurately determine the boundaries of the previously identified “inventoried roadless” areas and the inclusion (or proximity) of existing roads. The generic maps provided a pictorial display of areas and do not adequately identify all of the existing roads and landmarks to accurately determine the boundaries. For example, were you aware that the state of New Mexico operates a state highway through one of these cartoon areas? You wouldn’t if you relied on your provided maps. Not being intimately familiar with all 40 to 60 million acres, I find it difficult to intelligently comment under these conditions. (Recreational Organization, Los Alamos, NM - #5663.30000)

The map “Inventoried Roadless Areas on National Forest System Lands” has a dark green color to designate some areas. The code for that color indicates it includes “wilderness areas, wild and scenic rivers and national monuments.” That makes the color uninformative as to roadless areas because it includes both roadless areas and areas containing roads. Therefore the dark green areas should be broken down to show which parts are roadless and which are not. The same problem applies to a map of Arizona. (Individual, Tucson, AZ - #13128.33600)

I have looked at the US Forest Service map of roadless areas in the Ozark National Forest, including the Dismal Creek “inventoried special interest area”. The map shows a road going up the Dismal Creek drainage marked “Forest Service Road 1458A” No such road exist. I have hiked all the way down Dismal Creek from the Glory Hole near Arkansas Highway 16 to our place where Dismal Creek joins Walnut Creek. There is no road there, nothing resembling a road, and there has not been one since we bought the place in about 1993. You have to bushwhack the whole way down that drainage. If there ever was an old logging road, it has totally disappeared. If this “phantom road” is typical of Forest service mapping in other parts of the Ozark and Ouachita National Forests, then there is a serious problem. (Individual, Fayetteville, AR - #15439.32100)

CORRECT INACCURACIES OF MAPS ON THE WEB.

I will comment on the maps and associated databases provided as part of the DEIS. I found these maps to be a great resource for the public. However, they have numerous errors and inconsistencies that should be corrected in the final EIS. This is true of both the PDF files and the shape files, but the shape files seem to be especially “raw”. I have included three annotated maps that delineate some of these errors on the Stanislaus and Toiyabe National Forest in California (Individual, Albany, CA - #26866.33600)

The recommended Hoover additions (both Congressionally-mandated and Forest Plan-derived) are a source of error in the inventory. The western addition is in the PDF file, but not the SHAPE file. The eastern proposed addition is in neither file. This error needs to be corrected. (Individual, Albany, CA - #26866.33600)

I have been unable to view the downloadable maps on the roadless.fs.fed.us web site. The scale and detail of the maps make specific information unobtainable without many hours of effort, effectively preventing detailed public comment. The “roadless” areas defined for the Ottawa National Forest have been logged for many years, and roads through the forest are numerous. The maps and information to define the roadless area is incorrect. (Individual, Tustin, CA - #15501.34100)

Public Concern: The maps included with the Draft EIS should provide sufficient detail.

Given the significant number of acres involved, the maps included with the DEIS lack sufficient detail to determine the boundaries of the identified “inventoried roadless” areas and the inclusion (or proximity) of existing roads. The generic maps provided a pictorial display of areas and do not identify existing roads and landmarks to determine the boundaries. (Individual, San Diego, CA - #2876.34000)

Using a GIS overlay at a national scale is meaningless. (Individual, McCall, ID - #19994.33600)

UPDATE MAPS TO INCLUDE UNINVENTORIED UNROADED AREAS AND WILDERNESS AREAS

The DEIS separates currently unroaded areas into a variety of categories. One of those categories is uninventoried unroaded areas. The DEIS does not contain maps of these uninventoried unroaded areas for the Panhandle National Forest in Region 1 of the Forest Service. We are requesting a current map of the Panhandle National Forest that specifically identifies the uninventoried unroaded areas within that National Forest's boundaries. (County Elected Official, Bonners Ferry, ID - #16104.44240)

Maps and texts do not accurately identify wilderness areas. Therefore, the public is not well informed of the true nature of the environments. (Individual, Ford, CA - #15244.33000)

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

INCREASE SCALE

With only small scale maps of the roadless areas for our review it is difficult to know where the proposed boundaries are located. (Recreational Organization, Bozeman, MT - #7512.34000)

There have not been any detailed (1 inch = 1 mile) maps available on which to base reasonable decisions. It is impossible to determine exactly what areas are encompassed by this DEIS based on the maps supplied. (Individual, Thousand Oaks, CA - #15923.33600)

Please provide a separate mailing of maps of all Counties in the State of Idaho to a scale of 1:150000. Copies of these maps, colored so as to exhibit the damage you intend to do, should be available to all public meetings as well as mailed to all persons requesting and receiving your hastily and poorly prepared Volume 2. (Business/Business Association, Boise, ID - #75.44240)

Public Concern: The Forest Service should create accurate, up-to-date maps and acreage calculations of the unroaded portions of inventoried roadless areas.

Finally, we are very confused about the actual acres and areas that will be affected by the proposed rule. For example, the Medicine Bow NF recently published an updated inventory of Roadless Areas as part of the revision of their forest plan. That inventory showed 319,738 acres of inventoried roadless areas on the Medicine Bow NF. However, Appendix B indicates that there are 378,000 acres of "Inventoried Roadless Areas" on the Medicine Bow NF. An example of one reason for this discrepancy is the East Fork Encampment Roadless Area, which was calculated in the new inventory as 7,429 acres; that compares to 11,330 acres for the Coon Creek Roadless Area, as this area was previously named. Similar discrepancies are evident for the White River National Forest, the Arapaho Roosevelt National Forest, and the Nebraska National Grasslands. For example, the DEIS for the revision of the White River National Forest, LRMP states on p 3-379 - "There are 37 roadless areas on the WRNF, totaling approximately 298,000 acres; yet the Roadless DEIS Appendix B shows 642,000 acres of "Inventoried Roadless Areas." Our conclusion is that even though the proposed rule is supposed to apply to only the "unroaded portions of inventoried Roadless Areas", in fact, the acreages in Appendix B include "roaded portions of inventoried roadless areas" as well. Additionally, it appears that despite the footnote on page B-11, i.e., "Inventoried Roadless Areas are based on forest plans, forest plan revisions in progress where the agency has established an inventory, or other assessments that are completed or adopted by the agency. RARE II information is used if a forest does not have a more recent inventory based on RARE II", that forest plan revision inventories have been incorporated into this process. These discrepancies are unacceptable for a proposal of this significance. Because of these discrepancies and the confusion associated with the differences, we believe that it is absolutely essential that the Forest Service produce an accurate, up-to-date, and consistently calculated acreage and maps of the "unroaded portions of inventoried Roadless Areas" for public review and comment prior to a decision on this proposal. (Timber Company, Rapid City, SD - #15900.33520)

Public Concern: The Forest Service should map the location and size of every roadless and unroaded area before making any rules.

Before making such rules the Forest Service should first map location/size of every supposed roadless and unroaded areas. (Timber Company, Winston, OR - #2138.33600)

If the Forest Service insists on going forward, a new NOI should be developed that includes: A detailed list of areas being considered, including maps. (Individual, Titusville, PA - #905.33520)

Public Concern: The Forest Service should reconcile the large discrepancy in the number of acres of inventoried roadless areas on the Intermountain Region web site with that on national forest maps.

[The Intermountain Regional Forester] wrote that “In the 32 million-acre Intermountain Region (includes Nevada, Utah, western Wyoming and southern Idaho), this proposal would apply to about 16 million acres of inventoried roadless areas. In Utah, with 8 million acres of national forest land, the inventoried roadless areas total more than 4 million acres.” Please look up the roadless area maps (www.fs.fed.us/r4), compare them with forest maps, which show thousands of miles of inventoried forest roads within these areas, and request [the regional forester] to reconcile the discrepancies. (Individual, Roy, UT - #2133.64421)

Public Concern: The Forest Service should provide accurate maps of the Inyo National Forest in Volume 2 of the Draft EIS.

There is confusion and misinformation pertaining to the maps that are provided at Volume 2 of the current form of the Draft Environmental Impact statement (DEIS) being circulated. This is particularly true of the information that has been provided for the INF [Inyo National Forest]. The areas allocated to a particular prescription that does not allow road construction or reconstruction is incorrect. (Individual, Mammoth Lakes, CA - #13994.33600)

Public Concern: The Forest Service should clarify the table of contents for Volume 2 of the Draft EIS.

Table of contents for Volume II needs clarification—Are these only maps?? (Individual, No Address - #72.44210)

Public Concern: The Forest Service should clarify whether the farthest-north portion of the Badger-Two Medicine area of the Lewis and Clark National Forest is considered an “inventoried roadless area” on the roadless Draft EIS map.

Recently I noticed that an area thought to be included under “inventoried roadless areas” actually is not mapped as such. The farthest-north portion of the Badger-Two Medicine area of the Rocky Mountain Division of Montana’s Lewis & Clark National Forest is not considered an “inventoried roadless area” on the Roadless DEIS map. I’m not sure why that is so, because much of that portion contains no roads. (Individual, Choteau, MT - #2094.33600)

Public Concern: The Forest Service should improve the shading of Figure 3-17 on page 3-50 of the Draft EIS.

The shading of Fig. 3-17 on page 3-50 needs improvement; the legend doesn’t seem to match the map. (Individual, Oak Ridge, TN - #53014.33000)

Public Concern: The Forest Service should correct the graphics in the Draft EIS.

Some graphics in the DEIS are blackened (e.g., top graphic, header and portions of tables of alternatives, etc.). (Individual, No Address - #72.44210)

Public Concern: The Forest Service should provide a better representation of mining permissive tracts in the Draft EIS maps.

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 these areas in which roadless areas coincided with permissive tracts...Using a single map of an entire geographic region of multiple states showing permissive tracts of undiscovered mineral deposits 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. (Individual, Purcellville, VA - #15876.33600)

Public Concern: The tables in the Draft EIS should be scientifically based.

Many tables of comparison of effects contain wording such as “may cause, could increase, and decrease likely.” Simply conjectures, and a matter of opinion, not science based. (Individual, Carson City, NV - #669.31000)

Public Concern: The Forest Service should address inaccuracies in tables of the Draft EIS

Tables 2-2 and 2-3-- The table comparing the alternatives and environmental consequences provide an incomplete comparison by omitting certain sections analyzed in Chapter 3, Environmental Consequences. This leads to potential errors in interpreting the full effects of each alternative. RELIEF: The Forest Service must rewrite Tables 2-2 and 2-3 to include all the information disclosed in Chapter 3. (County Elected Official, Basin, WY - #43980.33200)

Table 3-54 is misleading in that it fails to list a number of national forests and communities that will be directly affected by the proposed action. To insure that the public has the opportunity to fully understand the impacts of the proposed action and in turn knowingly comment, a supplemental DEIS should be prepared that discusses all of the affected national forests and communities. The absence of this information in Table 3-54, raises the specter that these communities and forests were not considered in developing the DEIS. (County Agency, John Day, OR - #16087.33300)

Table 3-19 needs to be consistent with Table 3-4. How many miles of planned road construction are reconstruction activities by region? (County Elected Official, Fallon, NV - #17290.31300)

Public Concern: The Forest Service should clarify the data presented in Table 3-20 of the Draft EIS.

Yet another oddity is that the Forest Service claims that 100 percent of the roadless areas in South Dakota are in need of treatment to reduce wildfire threats, and that 71 percent of those acres are at high risk from wildfire. They claim that only five percent of the acres in Montana need to be treated, and that 67 percent are at risk from wildfire. This analysis is extremely confusing. We do not understand how they generated these numbers. It is impossible to provide complete comments on this document in its present form. (Timber Association, No Address - #52501.33300)

Public Concern: The Forest Service should clarify discrepancies between Table 2-2 and page 3-76 of the Draft EIS

In addition, errors occur in calculating the level of timber harvest reductions to assess impacts. On Page 3-76, a reference is made to a 33% reduction in timber harvest levels over other alternatives. A review of Table 2-2 indicates this reduction is 66%. This represents a 50% increase in harvest level reductions. (County Elected Official, Worland, WY - #16185.33300)

Public Concern: The Forest Service should address the data presented in Appendix B.

We are also very confused about the actual acres and areas that will be affected by the proposed rule. For example, the Medicine Bow NF recently published an updated inventory of Roadless Areas as part of the revision of their forest plan. That inventory showed 319,738 acres of inventoried roadless areas on the Medicine Bow NF. However, Appendix B indicates that there are 378,000 acres of “Inventoried Roadless Areas” on the Medicine Bow NF. An example of one reason for this discrepancy is the East Fork Encampment Roadless Area, which was calculated in the new inventory as 7,429 acres; that compares to 11,330 acres for the Coon Creek Roadless Area, as this area was previously named. Our conclusion is that even though the proposed rule is supposed to apply to only the “unroaded portions of inventoried Roadless Areas”, in fact, the acreages in Appendix B include “roaded portions of inventoried roadless areas” as well. (Timber Association, Laramie, WY - #15894.33520)