



Roadless Area Conservation on National Forest System Lands in Idaho Proposed Rule and Draft Environmental Impact Statement

NSG
NEPA
Services
Group

Summary of Public Comment

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June 2008

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1.0 Introduction and Overview

This document is a summary of public comment received by the U.S. Forest Service (Forest Service or Agency) regarding the National Forest System Lands in Idaho Draft Environmental Impact Statement (DEIS) on the proposed rule and request for comment. The comment period originally was December 21, 2007, to March 13, 2008, although the period was extended until April 7, 2008, as announced in the *Federal Register* on January 11, 2008 (73, FR 2027). The Forest Service has received 139,118 responses. Of these, approximately 130,420 are form letters; the remaining letters consist of original responses or form letters with additional original text.

A *response* is a single, whole submission that may take the form of a letter, email, fax, presentation at an organization-sponsored public meeting, etc. Each response may contain anywhere from one to several hundred comments.¹ Although many of the responses were *original responses*, which include both those submitted by individuals and those from agencies and organizations, the majority of the responses were *form letters*. Form letters are five or more letters that contain identical text but are submitted by different people.

Each original letter and an example of the form letter were analyzed to ensure that the concerns of all respondents were considered. In addition, if a respondent added information to a form letter, and the additional information was not redundant to the comment already in the form itself, this content also was analyzed. No out-of-scope letters were analyzed. Comments that were redundant to comments already analyzed and entered into the database were read and coded but were not entered in the database and are represented in the database with an “x”. This Summary of Public Comment is a narrative analysis of concerns raised in the responses.

Although this analysis attempts to capture the full range of concerns raised, it should be used with caution. The respondents are self-selected; therefore, their comments do not necessarily represent the sentiments of the entire population. This analysis attempts to provide fair representation of the wide range of views submitted but makes no attempt to treat input as if it were a vote or a statistical sample. In addition, many of the respondents’ reasons for voicing these viewpoints are varied, subtle, or detailed. In an effort to provide a succinct summary of all of the concerns raised, many subtleties are not conveyed in this summary.

This Summary of Public Comment is divided into the following sections:

- Introduction and Overview
- Content Analysis Process
- Project Background
- Summary of Concerns

The appendices to this document provide more detailed descriptions of the process used to analyze the comment received, the coding structure used by the analysts, demographic data about the respondents, and information about the organized responses (i.e., form letters):

- Appendix A—Content Analysis Process
- Appendix B—Coding Structure

¹ *Responses* refer to single, whole submissions from respondents (e.g., letters, emails, faxes, presentations at public meetings). *Comments* refer to identifiable expressions of concern made within responses.

- Appendix C—Public Concerns List
- Appendix D—Demographics
- Appendix E—Organized Response Report
- Appendix F— Public Meeting Opening Address by Governor Risch, January 14, 2008

2.0 Content Analysis Process

The goals of the content analysis process are to:

- Ensure that every response is considered,
- Identify the concerns raised by all respondents,
- Represent the breadth and depth of the public’s viewpoints and concerns as fairly as possible, and
- Present those concerns in such a way as to facilitate the Forest Service’s consideration of comments.

Content analysis is a method developed by a specialized Forest Service unit, the National Environmental Policy Act (NEPA) Services Group (NSG), for analyzing public comment. This method employs both qualitative and quantitative approaches. It is a systematic process designed to provide a mailing list of respondents, extract topics from each letter, evaluate similar topics from different responses, and identify specific topics of concern. The process also provides a relational database capable of reporting various types of information while linking comments to the original letters.

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

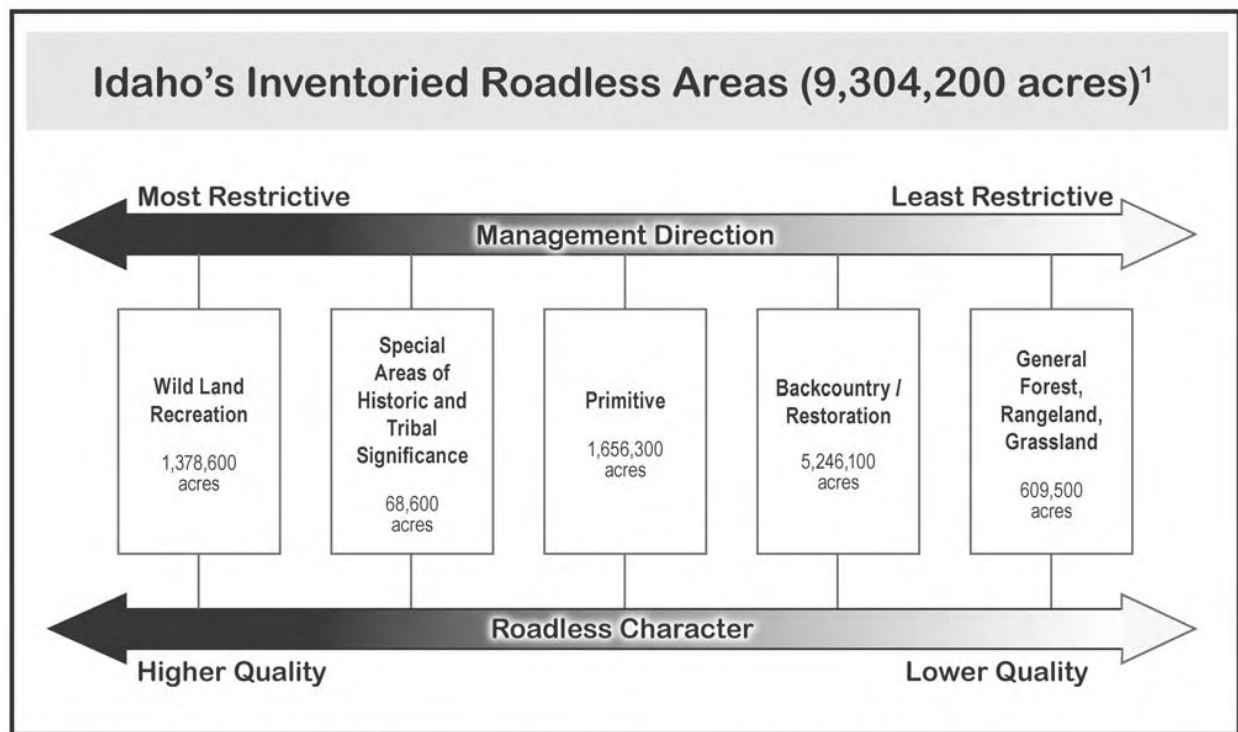
This Summary of Public Comment attempts to capture all significant concerns related to a project. However, it is only a summary. Content analysis summaries and reports are not intended to replace original letters. As noted above, the database reports are linked directly to individual letters.

3.0 Project Background

This section summarizes the project background information supplied in the DEIS. Some passages are quoted directly from that publication.

The Forest Service is proposing to establish a State-specific rule to provide management direction for conserving and enhancing the roadless characteristics for designated Roadless Areas in Idaho. This rule is in response to the Idaho State Petition presented to the Secretary of Agriculture under section 553(e) of the Administrative Procedure Act and Department regulations at 7 CFR § 1.28. The Department also has received rulemaking petitions from the Nez Perce Tribe and other organizations and individuals requesting reinstatement of the 2001 rule. The proposed Idaho Roadless Rule would designate a system of lands called *Idaho Roadless Areas* and establish five management area themes for individual Roadless Areas: Wild Land Recreation; Primitive; Special Areas of Historic and Tribal Significance; Backcountry/Restoration; and General Forest, Rangeland, and Grassland. The proposed themes

span a continuum (Figure 1) that includes at one end a restrictive approach emphasizing passive management and natural restoration approaches, and on the other end, active management designed to sustain forest, rangeland, and grassland management. This continuum accounts for stewardship of the uniqueness of each individual Roadless Area’s landscape and the quality of roadless characteristics in that area.



¹ 345,100 acres of forest plan special areas will be managed in accordance with applicable current and future forest plans

Figure 1. Idaho Roadless Rule Continuum

Allocation to a specific theme is not intended to mandate or direct the Forest Service to propose or implement any action; rather, the themes provide an array of permitted and prohibited activities regarding:

- Timber cutting, sale, or removal;
- Road construction and reconstruction; and
- Mineral activities.

The Proposed Action also provides for the ability to accommodate necessary corrections and modifications in the future.

The purpose of the proposed Idaho Roadless Rule is to respond to the State’s petition to provide State-specific direction for the conservation and management of 9.3 million acres of Inventoried Roadless Areas (IRAs) in the State of Idaho. The proposed Idaho Roadless Rule integrates local management concerns with the national objectives for protecting Roadless Area values and characteristics.

The management direction is based on individual roadless characteristics for lands (1) containing outstanding or unique features, where there is minimal or no evidence of human use; (2) containing culturally significant areas; (3) containing general roadless characteristics, where

human uses may or may not be more apparent; and (4) displaying high levels of human use, while:

- Protecting communities, homes, and property from the risk of severe wildfire or other risks existing on adjacent Federal lands;
- Protecting forests from the negative effects of severe wildfire and insect and disease outbreaks; or
- Protecting access to property, by ensuring that States, Tribes, and citizens owning property within Roadless Areas have access to that property as required by existing laws.

The Roadless Area Conservation National Advisory Committee (RACNAC) reviewed the petition and on December 19, 2006, issued a unanimous recommendation to the Secretary of Agriculture that the Forest Service and the State of Idaho, as the cooperating agency, proceed with the rulemaking.

The alternatives considered are:

1. Direction based on the 2001 Conservation Roadless Rule (2001 Roadless Rule);
2. Direction based on existing forest plans (Existing Plans);
3. Direction based on the State Petition, as presented to the RACNAC (Idaho Roadless Rule).

The Preferred Alternative (Alternative 3) represents a strategy for the conservation and management of Idaho Roadless Areas that takes into account State and local situations and unique resource management challenges, while recognizing and integrating the national interest in maintaining roadless characteristics.

4.0 Summary of Concerns

The following is a summary of the comments received on the National Forest System Lands in Idaho DEIS and the proposed Idaho Roadless Rule. This summary reflects public sentiment on a variety of concerns both diverse and interrelated regarding the DEIS and the proposed rule. These concerns range in nature from the strictly procedural to the technically specific. Public comment on these concerns demonstrates the interest, feelings, and concern Americans have regarding the management of National Forest System (NFS) lands and Idaho's Roadless Areas. In fact, many of the issues raised by respondents on the DEIS for the Idaho State Petition are similar to those raised by respondents during earlier roadless public involvement processes, particularly for the 2001 Roadless Rule, the 2005 State Petition Rule, the petition development process undertaken by the State of Idaho, and the Notice of Intent for this rule. These comments reflect the convictions of many respondents concerning the National Forests, the designation process, and the priorities the Forest Service should use to manage Roadless Areas in Idaho.

This section begins with a general analysis and proceeds with identification and discussion of respondents' main areas of concern. It is divided into the following parts:

- General Analysis
- Rulemaking Process and Public Involvement
- The Proposed Rule
- DEIS Analysis and Requested Revisions
- National Forest Management and Resource Issues

4.1 General Analysis

The responses to the National Forest System Lands in Idaho DEIS and the proposed rule are characterized by the wide variety of opinions, the thoughtfulness of the responses, and the thoroughness of the respondents. Many comments are detailed and specific and raise multiple issues sometimes tied to specific Roadless Areas. Many of the respondents refer to the scoping process and clearly have been active participants throughout the scoping and eligibility and suitability determination processes. As a result, a number of the respondents include comments they have submitted previously.

The Idaho State Petition is the latest stage in national debate on the appropriate way to manage Roadless Areas within NFS lands. Many comments received on this rule reflect this continued debate, and many of the issues raised during this comment period were raised as part of the earlier rulemaking efforts for the 2001 Roadless Rule and the 2005 State Petitions Rule. Most respondents who favor the 2001 Roadless Rule also oppose the Idaho State Petition, and many of the opponents of the 2001 Roadless Rule express support for the Idaho State Petition. Likewise, the concerns raised during the current process are often the same concerns that were raised during earlier processes. For example, supporters of the 2001 Roadless Rule often favored that rule because it protected Roadless Areas from additional road construction, and they now oppose the Idaho State Petition because they believe it undermines those protections.

Many respondents are also clearly aware of the earlier debates and often refer to earlier rules, earlier public involvement processes, and the various court cases and rulings that surround these earlier proceedings. Thus, what often separates the proponents and opponents of the proposed rule is an honest difference in perspective regarding the fundamental nature and role of NFS lands.

4.2 Rulemaking Process and Public Involvement

4.2.1 Rule-Making Process

The difference in perspective among respondents who favor and those who oppose the State Petition and the proposed rule tends to foreordain their views regarding the efficacy and fairness of the rulemaking process and of the public involvement in that process. The single greatest division in perspective exists between respondents who believe that the Forest Service should have dominion over National Forest roadless lands and thus should have the most input in how they are managed. Those respondents who believe that communities nearest Roadless Areas should have the most input almost uniformly approve of the process used to develop the proposed rule and the nature of the public involvement. Many of these respondents assert that the proposed rule should be implemented in a timely fashion and that county commissioners should continue to coordinate between their constituents and State and Federal agencies and offices regarding input about how Roadless Areas should be managed. Respondents favoring the proposed rule also tend to believe that the Forest Service should continue to rely on the RACNAC for advice and counsel. Some respondents opposed to the proposed rule suggest that the Forest Service should start over with the scoping process, viewing it as having been inadequate, and others in opposition object to the Forest Service's use of the Administrative Procedure Act to modify the 2001 Roadless Rule, stating that using the Act is inappropriate and sets "dangerous precedents for the rest of the nation's Roadless Wildlife Habitat Areas."

Many respondents insist that it is improper or illegal for the Forest Service to delegate its management authority over and responsibilities for National Forest Roadless Areas to State governments. Some state that the “Federal Government cannot cede its authority over public lands to governors or States,” while others view the proposal as the Agency, in effect, divesting National Forest lands from the ownership of all Americans. Respondents are concerned that the States lack the expertise and standing to manage the Roadless Areas within their boundaries, and they believe that a single authority would manage them with greater consistency and take the longer view in terms of management objectives and goals. This concern is amplified in situations where national Roadless Areas, and particularly the same ecosystems, span State boundaries.

Some respondents, however, believe that National Forest rulemaking ought to be left to the States and the residents of those States, with varying opinions regarding how much say the States and their residents should have over management of Roadless Areas. Some believe that the State should have essentially complete control over those lands, while others feel that simply having some larger amount of input than the rest of the nation would be appropriate. These views are encapsulated in comments asserting that Idahoans know what is best for themselves and the Roadless Areas in their State (“People who don’t live in Idaho should not make decisions for Idahoans”), or that Idahoans themselves should have more input than the special interests that these respondents view as driving the process. Others would strike a collaborative balance, saying that the Federal government should work with the State to manage Roadless Areas, and more specifically that the State of Idaho should be empowered to act as an intermediary to resolve road access conflicts. Another view supports the idea that Forest Service should follow the State’s involvement in rulemaking with “National Congressional deliberation.”

Native American respondents favor the Forest Service retaining management responsibility over national Roadless Areas, citing the Federal government’s trust obligations to the Tribes. These respondents state that the consultation process between the Forest Service and the Tribes, as mandated by law, is important to Native Americans because their well-being is inextricably bound to the well-being of the ceded and adjacent lands that fall within Roadless Areas. Many of these respondents believe that their views have been only minimally heeded during the Forest Service’s and the State’s public involvement processes.

The level of honesty and resulting trust typifying the State Petition and proposed rule development process is a pervasive concern. Many respondents want the Forest Service to engage in a more honest presentation of the nature of the proposed rule, by acknowledging that it offers less protection than the 2001 Roadless Rule. Comments varyingly encourage the Agency to be more realistic about the challenges to its proposal, legal and otherwise, that it proceed with a process that complies with the law, and that it manage Roadless Areas in the best interests of the public rather than chiefly on behalf of special interests. Some respondents would like the Agency to wait for legal resolution of the 2001 and 2005 Roadless Rules before attempting to promulgate the proposed rule, while others seek a process that would support the Agency in making robust management recommendations. Development of a process that would recognize and honor the needs of diverse governmental bodies is important to a few respondents seeking an inclusive approach, while another suggestion, desiring to protect the interests of multiple-use and motorized recreationists, invites the Forest Service to request that a “Multiple-Use Review Board look into all past travel management decisions.” Figuring that legal challenges are endemic to the process of rulemaking, regardless of how inclusive the process may be, one respondent would like to see the Agency bolster its legal staff by hiring private law firms.

4.2.2 National Forest Management Philosophy

Many respondents implore the Forest Service to return to its conservation and stewardship roots, a reorientation one respondent suggests would be facilitated by the Agency no longer rating their managers according to board feet of timber sales. One common desire is for the Agency to maintain the National Forests through “sustainable forestry initiatives.” The deepest division in terms of management philosophy, however, is whether or not to use multiple use as the guiding principle in management decisions. Those favoring a continuation of logging, mining, and motorized recreation activities, while employing practices that safeguard the environment, favor the multiple use approach. Those who believe that the forests’ role in mitigating climate change, for example, is more important than extractive or recreation values do not want multiple use to be the guiding principle.

Funding is a concern that some respondents view as inextricable from the formulation of a National Forest management philosophy. Many respondents contend that, given the lack of sufficient budgetary resources seemingly well into the future, the Forest Service should focus on conservation efforts that are renewable and sustainable. Making the repair of existing roads a priority makes more sense than building new roads, respondents assert, as well as educating the public about these roads, their nature, and purpose. Enforcement efforts to protect existing roads and the lands to which they provide access should be enhanced, again rather than using limited funds to build new roads. Supporting motorized recreation by using gas tax revenues, suggests one respondent, might effectively ease the financial burden on the Agency.

4.2.3 Influences on the Decision-Making Process

A large number of respondents assert that the Bush administration (the Administration) and special interests the Administration favors have had undue influence on the decision-making process by which the proposed rule was developed. Many fervently express their hope that the Forest Service will resist the Administration’s efforts to provide special interests greater access to Roadless Areas via the proposed rule. Respondents believe that the Administration’s efforts are “essentially illegal” or unconstitutional in this regard, and perceive those efforts as, again, an attempt to divest the American taxpayers of ownership of these lands. They object to what they perceive as fear-mongering on the Administration’s part, and there is much dismay at the Administration’s perceived failure to hold accountable the relative few who profit from harvesting and extracting on these lands for the disturbances and pollution of Roadless Areas. Respondents point out that the taxpayers are left holding the tab for clean-up of these lands, and when there is no clean-up the loss to the American legacy and to future generations is an untenably high price to pay. Politicians should not be making decisions about fish and wildlife issues, many say, whereas others insist that all Americans should have a say in how Roadless Areas are managed.

Some respondents decry the influence that “[e]nvironmental groups with substantial funding” have on the process, saying that these groups, in their efforts to deny access, do not represent national opinion. Others believe that Idaho counties would be the best stewards of roadless lands within their boundaries, as they are “most affected and most knowledgeable” about those areas. The argument defined by whether local government, local groups, and local residents would provide balanced stewardship into the future or would succumb to profiteering influences and short-term needs at the expense of the nation could not be typified by starker division. Native American Tribes provide a third perspective on this argument, their comments transcending the

notion of “local” versus “remote” or “removed” by pointing to their unique relationship to these lands, which is protected by special laws and treaty responsibilities on the part of the Forest Service and the Federal government. Many Native American respondents feel that their participation in the decision-making process received short shrift, given these laws and treaties and wish to receive more comprehensive or detailed responses to the input they have provided.

4.2.4 Public Participation

One perspective that spans many points of view is the sense that, while the public comment process is highly valued by those who participate, the Forest Service should pay closer attention to their expressed views. A commonly held belief is that public comment should be taken more seriously, and a strong undercurrent suggests that many citizens are feeling ignored or misrepresented. Respondents claim that were this not the case, the expensive process of attempting to establish the Idaho Roadless Rule would not have been initiated, given the overwhelming tenor of public opinion in the past. One respondent posits that, were public comment taken seriously, the American people would not be asked to comment so frequently, as though the Forest Service was trying to “wear down those that actually comment.”

Nevertheless, because public participation is seen as crucial to the decision-making process, many respondents want the Forest Service to improve the methods and the robustness of its outreach efforts. Some respondents would like the notification process improved, others call for longer comment periods to provide greater opportunity for public participation, and still others would like there to be more public meetings and to feel that the Forest Service was taking their opinions more to heart. Respondents state that the process of gathering comment from outside of Idaho was lacking, whereas others assert that the process within the State was not equitable in terms of opportunity to comment or how seriously comment within the State, county to county, was taken. Many respondents lodged complaints regarding how county commissioners conducted the public hearings and how they represented public comment to the State government and the Forest Service. They claim that the Forest Service and the State “have conducted a sham process that ignores the will of the public.” Some respondents thought that the comment forms were misleading and biased, and some contended that the distribution of the county-specific forms was inadequate. It is even suggested that a “process failure” was planned to “to arrive at a predetermined outcome.”

Some motorized recreationists ask that the Forest Service do more to reach out to these organizations. Tribal values should have been better represented in the comment process, state some respondents.

4.2.5 Agency Involvement and Consistency with Plans, Programs, and Policies

Consultation between the Forest Service and other agencies and organizations is another topic on which respondents are divided. Some respondents feel that the Forest Service should delay formal consultation until a final action has been submitted, whereas others insist that the Agency should not delay consultation, primarily because the proposed rule would affect the environment. One position posits that the “Forest Service must engage in formal consultation with the U.S. Fish and Wildlife Service (USFWS) and NOAA Fisheries at the time a final action is selected” to comply with the law and previous court rulings. Some respondents specifically cite the court

ruling that set aside the 2005 Roadless Rule and request that the Forest Service abide by the spirit and letter of that ruling. Another position, concerned that the Forest Service has not complied with the Endangered Species Act (ESA), encourages the Agency revisit their consultation with the USFWS and National Marine Fisheries Service.

Some respondents suggest that the Forest Service consult with State agency and geothermal industry representatives to ensure that “geothermal exploration and development opportunities are not excessively restricted.” Others suggest a similar approach regarding mineral exploration, stating that such consultation would help to reduce the likelihood of unreasonable restrictions and confusion.

4.3 Proposed Idaho Roadless Rule

4.3.1 General Support for and Opposition to the Proposed Idaho Roadless Rule

As suggested earlier, the fault line between respondents who support and those who oppose the State Petition and the proposed rule appears to run deep, and their positions are defined by opposing views on nearly every related issue, consideration, reason, and rationale. Respondents who support adoption of the proposed rule often characterize the 2001 Roadless Rule as a “one-size-fits-all” approach that is ill-suited to a balanced approach to forest management. Supporters believe that the proposed rule will provide needed flexibility in forest management, particularly at the local level, where the most sound management decisions are made. Some supporters appreciate that the proposed rule takes the desires of Idaho residents into account, and others assert that it “addresses the needs of all stakeholders.” Respondents believe that the proposed rule will eliminate the legal uncertainties that have “paralyzed” Forest Service decision-making in the past, and some cite significant public involvement in the process as indicative of the integrity of the development process and the proposed rule itself.

Supporters point out that the proposed rule is consistent with The Multiple-Use Sustained-Yield Act (MUSYA), and indeed a multiple-use management philosophy appears endemic to a favorable view of the proposed rule. Some state that it is also consistent with the Rangeland Renewable Resources Planning Act, and others speak to its compatibility with The Wilderness Act. The proposed rule’s relationship to other Federal regulations and existing forest plans is also sound, assert supporting respondents, some of whom also claim that it will allow the agency “to collaborate and cooperate” with Native American Tribes.

Respondents favoring the proposed rule applaud its accommodation of mineral extraction, phosphate mining in particular, saying that in practice the 2001 Roadless Rule did not allow access to mineral lease lands. Phosphate mining supports agriculture, some point out, and extractive uses generally provide economic opportunities to communities that would languish without them. Extractive industry also supports charitable organizations such as The United Way. Some respondents characterize the National Forests themselves as a renewable resource and maintain that they should be used to the fullest, while others are concerned that if extractive access is denied, industry will move to other nations where the regulatory climate is more favorable.

On the other hand, the many respondents opposing the proposed rule point out that the Forest Service “promised to support the [2001] Roadless Rule.” Some are concerned that the proposed

rule will open a new round of protracted litigation, while others feel that the proposed rule creates confusion that was resolved by the 2001 Roadless Rule. In many instances, the reasons that respondents cite as the basis for their opposition to the proposed rule are identical to those that they and other respondents list as their reasons for wanting to retain the 2001 Roadless Rule. Some opposed to the proposal feel that the 2001 Roadless Rule is more in keeping with the Forest Service's mission, and that by proposing the new rule the Agency is abdicating its responsibilities to the American people. In fact, it is a pervasive pattern that respondents opposed to the proposed rule favor the tenets of the 2001 Roadless Rule. Hence, to enumerate respondents' reasons for opposing the proposed rule is to enumerate, in the direct inverse, reasons many cite for preferring what some term the "Clinton Rule," referring to the previous regulatory guidance. In other words, where respondents believe that the Idaho Roadless Rule should be opposed because it will open additional acres to logging and mining, often the same respondents support the 2001 Rule because they perceive it as far more restrictive toward logging and mining activities. As this is the case, this summary will focus primarily, although not exclusively, on comments made regarding the proposed rule.

The most pervasive objection to the proposed rule stems from the perception that the Idaho Roadless Rule would facilitate large-scale development of Roadless Areas. Many respondents describe the Roadless Areas within Idaho as forming the "last intact forest ecosystem in the lower 48 states," an ecosystem whose integrity would be permanently compromised by the building of new roads often required by extractive uses. Many respondents are concerned that new roads would increase fragmentation of this last intact ecosystem, thus threatening the diversity of native plant and animal communities, the purity of watersheds and the health of aquatic species and fisheries, and the integrity of sensitive soils should the proposed rule be adopted. Specifically, opponents cite increased erosion, invasive plant species, including noxious weeds and destructive insects, and increased wildfire risk as predictable results of new roads. Biodiversity and ecological health are of special concern to those who seek to maintain "complete, healthy ecosystems" as a hedge against climate change.

Opponents assert that, supplanting the 2001 Roadless Rule with the Idaho Roadless Rule would "benefit a few and not the public in general." The marked increase in logging and mining that many respondents foresee under the proposed rule would result, they assert, in significant social and economic costs in return for no significant or lasting economic benefit. Some respondents perceive the Forest Service's claim that new roads are needed to allow access for crews to fight wildfires as being disingenuous increased risk of wildfire—with new logging roads resulting in increased human activity, increased felled and dried out vegetal material, increased ground temperatures as a result of canopy loss, and the openness of logged land to winds—one situation respondents fear will have both social and economic costs attending the loss of once healthy forest.

Many respondents submit that opening additional acres to phosphate mining will lead to increased selenium contamination, putting livestock and human beings at risk. Respondents invoke the Superfund sites still remaining in Idaho as a result of earlier phosphate mining, and the lack of will or the inability on the part of the Forest Service to compel the industry to clean up those areas.

The proposed rule's effect on recreation is also a concern. Some respondents attest that the proposal will have a negative impact on motorized recreation and the motorized recreation industry, primarily by unduly restricting access. Non-motorized recreationists are also concerned

that the combination of increased extractive uses, increased development, and the resulting disturbances and pollution will affect formerly pristine areas that hikers, backpackers, wildlife watchers, fishermen, and hunters depend on. While the loss of visual and ecological integrity would affect all recreationists to some degree, fishing and hunting organizations, as well as individuals who enjoy these activities, are concerned with the impact on wildlife populations should there be an increase in extractive uses. Hunters are concerned, in particular, about the effects on big-game populations. Many respondents point out that the recreation industry is a major contributor to the economy of Idaho, eclipsing the extractive industries in that regard, and that it does so in a sustainable way. In addition, tourism, which in Idaho depends on access to unspoiled lands, also would be heavily affected, assert opponents of the proposed rule. While there is a great deal of crossover between the tourism and the recreation industries, economically and otherwise, many tourists are attracted to Idaho for its scenic beauty and opportunities of quiet, solitude, and inspiration. Respondents express concern that those qualities will be compromised to a degree that even light-access recreation tourism will be negatively affected.

Opponents of the proposed rule have a number of economic concerns, beyond those mentioned above, related to the proposed rule. Some perceive the potential increase in development of Roadless Areas, based on extractive uses, as tacitly encouraging short-term economic fixes to long-term economic and resource problems. Others claim that the Forest Service inappropriately seeks to increase its own revenues by increasing development of these lands, even as the extractive industries profit at the expense of the American taxpayer and future generations. Respondents seek to know how the Forest Service will maintain new roads when the Agency cannot afford to maintain existing roads or support current management programs. Many consider the 2001 Roadless Rule superior to the proposed rule not only in terms of providing greater protections and stewardship for Roadless Areas, but for providing a more realistic approach to forest management, given the likelihood of limited budgets in the years to come. The 2001 Roadless rule is credited by many with containing adequate provisions and management flexibility to address fire and forest health issues, while still others believe that Roadless Areas generally do not need to be managed. Others characterize “forest management,” in the context of the proposed rule, as a euphemism for a giveaway of public lands to extractive industries.

While some respondents decry the 2001 Roadless Rule’s “one-size-fits-all” approach, many others describe the proposed rule’s approach as typified by “incremental decision-making” in its provision that each project be assessed separately for potential environmental impacts. Many opponents maintain that the rulemaking process has violated NEPA and that the proposed rule itself inappropriately avoids consideration of cumulative impacts on the national public interest. Some variously maintain that it conflicts with existing forest plans, with court decisions, with the National Forest Management Act (NFMA), and with treaty rights. Others characterize the proposed rule as an illegal transfer of authority and “morally unconscionable,” while still others view it as setting a destructive precedent. Respondents claim that the proposed rule is the product of a “back-door agreement between the State of Idaho and the Administration,” and point out that it is based on the recommendations of an interim governor. Undue influence on the development process by mining and timber concerns, and opposition by other State governors to the State Petition and the proposed rule, are cited as indicators of how this action is intended to serve relatively limited interests at the expense of the public and the nation. A number of respondents remind the Forest Service and the State that not only is a vast majority of the American public opposed to the proposal, but even a majority of Idaho residents are opposed, some stating that it would disproportionately affect southeastern Idaho. Respondents express

particular concern for the Caribou-Targhee National Forest were the Idaho Roadless Rule to be enacted, pointing out that this forest is a stronghold for plant and wildlife species not found elsewhere.

Native American Tribes express grave misgivings about the State Petition and the proposed rule's loosening of environmental restrictions. Some Tribal respondents state that regardless of whatever planning rule is promulgated, restrictions equivalent to those in the 2001 Roadless Rule must be maintained. They are concerned about a more permissive set of requirements foreclosing Tribal involvement in developing Land and Resource Management Plans. They also remind that reducing protections for Roadless Areas may result in the Forest Service falling out of compliance with the Fort Bridger Treaty.

Many respondents who support the State Petition and the Idaho Roadless Rule believe that the 2001 Roadless Rule does not allow sufficient usage of National Forests. Respondents state that these forests were "meant to be utilized," and they assert that, in providing only one standard for all forests, the 2001 Rule does not comply with MUSYA nor does it generally allow for multiple use. Others interpret the current rule as violating the Americans with Disabilities Act, and in its restrictive posture toward new roads view it as discriminating against those who are not able to hike long distances and against small children. Respondents also view it as providing insufficient flexibility to address specific forest issues, and a few conclude that it has "resulted in huge wildfires." Some feel that this rule tacitly puts "radical environmentalists" in charge of the National Forests, while others submit that the Idaho Roadless Rule, with its less restrictive requirements regarding resource extraction, will allow our nation to better address the trade imbalance.

4.3.2 Revisions to the Proposed Rule

Some respondents suggest that the Forest Service revise the proposed rule to include a clearly stated purpose and need because the inclusion in the DEIS is inadequate. Others question whether the proposed rule would meet the stated purpose and need, as the Agency's own analysis, they contend, does not support its assertions. A provision for periodic review of the proposed rule should be included, state some respondents, because the mechanism for making changes is too burdensome. Others contend that the mechanism may be ripe for loopholes and steady erosion of roadless lands and values, particularly under the umbrellas of "administrative correction" or "non-significant modification," and thus the public should be involved in reviewing changes. There are requests that the Forest Service include clarification of the relationship between the proposed rule and existing forest plans.

One suggestion for revision requests that the Forest Service propose management themes without assigning them to particular Roadless Areas, while another asks that "[a]ll roads be identified and the area associated with them excluded from roadless consideration.." A few respondents ask the Agency to include clarification of how the proposed rule would affect Wild and Scenic Rivers and Research Natural Areas, as well as a description of how the soils analysis was completed.

4.3.3 Implementation Commission

Respondents request that the proposed rule include the Implementation Commission, to ensure that country and local residents play meaningful roles in implementing the rule. Some request

that the Forest Service clarify how the commission would be structured, including the number of members and the groups that would be represented, and how decisions would be made. Motorized recreation interests insist that the commission include individuals who represent the interest of the participants and the industry, to ensure that their views are considered.

4.3.4 Timber Harvest and Forest Health Considerations

While respondents request that the Forest Service expand the Roadless Areas open to timber harvest, in part to reduce wildfire risk, many others request the opposite. From the latter camp, respondents want retained the restrictions on road construction and timber harvest contained in the 2001 Roadless Rule, pointing to the “broad, vaguely written exceptions” of the proposed rule. Respondents want the Agency to ensure that roadless characteristics would not be degraded by timber harvest. Tribal interests fear that expanded timber harvests under the proposed rule will affect Tribal resources, although in seeming opposition, a few respondents wish to be reassured that, under the Primitive and Special Areas of Historic or Tribal Significance themes, protections would not exceed those of the 2001 Roadless rule. Various respondents seek elimination of the provisions allowing road construction and harvesting in areas damaged by weather, disease, or insects, including those who request that the Agency not use tree disease as a reason to allow harvesting because the science used as justification is questionable. Others request that the Agency supply evidence to support the assertion that logging would reduce the prevalence or spread of tree disease and insect infestation.

Troublesome to some respondents is the change of language from the description of wildfire as “uncharacteristic” in the 2001 Roadless Rule to “unwanted” in the proposed rule. They perceive the latter term as opening a discretionary loophole, finding it susceptible to potentially capricious interpretation. Far more respondents, however, are troubled by the term *significant risk* in the proposed rule, some requesting that it be clearly defined and others requesting that it be eliminated altogether. Those seeking the term’s clarification are interested in more precisely knowing when timber harvesting would be permitted, in avoiding multiple interpretations of the proposed rule, and in understanding how it would limit harvesting. Those seeking its elimination want to reduce uncertainty and the potential for increased road construction, say that the term is not needed, and point out that it is not widely accepted by foresters or the public.

Whereas one respondent requests that the Forest Service remove the term *forest health* from section 294.23(b)(1)(i), others would like the definition of the term expanded to include watershed water quality, fish and wildlife habitat, and ecosystem processes. Another suggestion is that the Agency clearly define the threshold for active management for the purpose of forest health. Respondents are concerned about the removal of the terms *infrequent* and *generally small diameter*, asking the Agency to explain the removal and provide NEPA analysis of the change.

Another concern about the language of the proposed rule involves the term *Wildland Urban Interface (WUI)*, which respondents wish to have clearly defined. Doing so would help the Agency avoid legal problems and would delineate the WUI areas for the public, they say. Some respondents also seek delineation of areas referred to as *municipal watersheds*.

4.3.5 Road Building Considerations

Much concern exists about the temporary versus permanent nature of roads that are described as being temporary. Many respondents assert that the Forest Service should not allow temporary

road construction because it lacks sufficient means to police the roads it already has and has a huge backlog of road maintenance. Others would like the Agency to acknowledge that funds for closing and decommissioning temporary roads are lacking, and that in essence this means temporary roads may be permanent. Still others believe that the Agency should eliminate the exception for stewardship roads from the proposed rule.

4.3.6 Mining Considerations

Respondents supporting phosphate mining in Roadless Areas do so, in part, because those activities support local economies. In consideration of property rights as protected by the Constitution, some insist that the Forest Service protect the right of access to existing leases. Many respondents, however, are opposed to the Agency issuing new leases in Roadless Areas, submitting that new mines are not needed to meet demand. They state that leases should be limited to those already in existence and to Known Phosphate Leasing Areas (KPLAs), among other reasons so that the proposed rule is consistent with the Caribou Forest Plan.

A commonly held opinion is that the Forest Service should allow only environmentally responsible phosphate mining, and that no company should be given a new lease that has failed to clean up the pollution it has already caused. Open pit mining should be prohibited, say some respondents, because the risk of selenium contamination of watersheds and aquifers is too great. Citing the contamination already caused by the Smokey Canyon Mine, an open-pit operation, some respondents oppose its expansion. While others state that the Agency should revise the mineral activities section of the proposed rule to require public involvement and environmental analysis, still others oppose any expansion of the authority and discretion to issue new leases on Roadless Areas because doing so is “an irreversible commitment of resources.”

4.3.7 Alternative Energy

Respondents oppose exemptions for renewable energy projects in Roadless Areas, and some say that geothermal energy projects in particular should be discouraged. The overarching reason is that geothermal projects would impact the environment, requiring new roads, buildings, fencing, security, transmission lines, and test drill sites.

4.3.8 Other Considerations

Respondents express other varied considerations. Comments state that the Forest Service should do the following:

- Protect and manage every Roadless Area watercourse;
- Prescribe vegetative buffers;
- Maintain species population viability;
- Ensure that core population areas for Gray wolf are buffered from humans and livestock;
- Ensure that no Roadless Areas in Boundary County fall within the WUI;
- Should not defer to the Healthy Forests Restoration Act in determining WUI boundaries;
- Should not reduce protection for Lochsa Face, North Lochsa Slope, and Weir-Post Office Creek; and
- Not restrict access to grazing allotments.

4.3.9 Management Themes

General Considerations

The proposed management themes are the subject of some controversy. Support of the themes seems based largely on the flexibility and the multiple-use advantages that respondents perceive them as conferring on the management process. Opposition seems to stem from the perception that they will facilitate development of Roadless Areas, offering less environmental protection than the single set of requirements contained in the 2001 Roadless Rule. Opponents suggest that the Forest Service revisit the use of the themes in the proposed rule, stating that the public would prefer a more “holistic” approach. Others are concerned that the themes will degrade Roadless Area acreages and values, describing the use of themes as a “sliding scale” approach that is inconsistent with the value of Roadless Areas. Many respondents, request that the Forest Service clarify the themes and better define terminology. For example, it is suggested that the Agency clarify the impact of the proposed rule on Wilderness resources, to avoid conflation of Wilderness with the Wild Land Recreation theme.

Respondents submit many specific requests that IRAs, as well as specific sites within those areas, be designated according to specific themes. They also request a large number of theme changes, such as seeking reclassification of all unroaded and unlogged areas from General Forest to Backcountry/Restoration or, more specifically, reclassification of the Rapid River Roadless Areas from Primitive to Wild Land Recreation. Other suggestions are based on a certain quality or activity respondents seek to protect, such as requesting that the Forest Service retain the Wild Land Recreation, Primitive, and Backcountry/Restoration themes in order to protect unspecified Roadless Areas for recreation. Another suggestion would have the Agency manage large portions of IRAs under the Commodity Production Emphasis within Forested Landscapes.

Wild Land Recreation Management Theme

At least one respondent requests that the Forest Service reduce the number of areas in Wild Land Recreation to protect air quality.

Primitive Management Theme

Respondents whose views appear to oppose one another take the same general position on the Primitive theme, but for differing reasons. One position asserts that the Forest Service should avoid using the Primitive theme because a Roadless Area so classified would fall short of Wilderness suitability criteria, while the other position would have the Agency avoid using the Primitive and Wild Land Recreation themes because any areas designated as such would essentially become Wilderness areas.

Backcountry/Restoration Management Theme

Although some respondents affirm that the Backcountry/Restoration management theme should be applied as described, others state that it should be avoided because it would allow road construction, timber harvesting, and other forms of development. Some find the road construction exception ambiguous and are concerned that the theme would provide insufficient protection against road construction, whereas others believe that it would inappropriately apply to areas previously subject to timber harvesting and motorized recreation. The exemption for phosphate mining should be eliminated from this theme, insist other respondents. Still others

assert that this theme should be revised to require documentation of habitat for special-status species before allowing timber harvesting. On the other hand, there is concern that the theme might not provide sufficient management flexibility to address wildfire, disease, drought, and other forest health issues.

General Forest, Rangeland, and Grassland Management Theme

Respondents again differ between those who would have the Forest Service apply the General Forest theme as it is described and those who feel strongly that it should not be used in any IRA whatsoever. Some would prefer that the Agency reevaluate all areas placed in this theme, while others request that the Agency provide “the detailed reasons why each Roadless Area was placed in” this theme, as requested by Roadless Area Conservation National Advisory Committee.

Respondents request that the Forest Service revisit the impacts of the General Forest theme on the aboriginal territories of the Shoshone and Bannock peoples, to protect “unique opportunities” the Tribes enjoy under the Fort Bridger Treaty of 1868. Another suggestion would have the Forest Service divide General Forest into two themes, to separate out lands with KPLAs.

Special Area of Historic or Tribal Significance Management Theme

Respondents request that the Forest Service modify the Special Area theme to clarify that areas designated by other themes may contain Tribal or historic characteristics that must be protected at the project level.

Ski Areas

Some respondents would favor creation of a “Forest Plan Special Area—Ski Area” theme. Even so, others believe that classifying any land within the Primitive management theme as a ski area would be inappropriate to the theme. There is also opposition to allowing more ski runs near Cascade Reservoir, to limit the impact of runoff, and a request that the Forest Service modify the proposed rule to allow for existing recreational uses on the Lime Creek Roadless Area, among other specific requests.

4.3.10 Roadless Area Boundaries

Respondents submit specific requests, asking the Forest Service to reevaluate the boundaries of the Lime Creek Roadless Area and suggesting that the Agency add the Lions Head and Abandon Mountain Areas to the Selkirk Crest Roadless Area.

4.4 DEIS Analysis and Requested Revisions

4.4.1 General Comments

Perhaps the most prevalent concern among respondents relates to the DEIS’s compliance with NEPA, particularly in regard to the purpose and need and the impact analysis of the proposed rule. While one respondent decries the length of the DEIS as discouraging public comment, overwhelmingly respondents request a more thorough, comprehensive, and scientifically based programmatic DEIS. Some respondents request that the Agency disclose “non-conforming” uses in the final EIS to inform the public of “the actual character of specific Roadless Areas.” All the

same, far more respondents assert that the Forest Service, to revise the DEIS in order to bring it into compliance with NEPA, must do the following:

- Provide needed information to the public;
- Describe how the proposed rule will directly affect the environment;
- Provide a “scientifically and quantitatively credible” analysis of effects;
- Provide substance that will go beyond *pro forma* compliance;
- Provide sufficient information to facilitate decision making;
- Describe to the public the IRA boundary changes of which they were not informed;
- Take a “hard look” at potential impacts of the proposed rule;
- Analyze the impacts of expanded phosphate mining;
- Provide site-specific information; and
- Acknowledge that the DEIS is, in effect, a forest plan revision.

Respondents seek an accurate representation of the 2001 Roadless Rule to ensure a “fair and accurate evaluation” of alternatives. They also would benefit, some say, from an accurate portrayal of designations of IRAs in relation to their roaded versus roadless character, as “many areas classified as roadless actually have roads.” Abundance of IRA acreage in any given State is believed by some to be a misguided justification for development, given the scarcity of roadless acreage nationwide.

Seeking an accurate assessment of impacts on their resources, Native American Tribes request that the Forest Service provide sufficient baseline data. Indeed, some respondents request that the Agency provide a full analysis of effects of the proposed rule on each IRA affected.

4.4.2 Relationship to Forest Plans

Respondents encourage the Forest Service to revisit the rationale for using the Forest Plan baseline approach, saying that it does not represent the “Best Consensus of the public,” and others request that the Agency clearly establish who retains what authority regarding forest plans and the proposed rule. Others are concerned that the Agency is relying on Forest Plans currently undergoing revision to form the basis for the proposed rule, and also that the Agency is relying on Forest Plans for resource protection and mitigation, as many plans are outdated, incomplete, or lack standards and guidelines. Because not all Forest Plans evaluate roadless issues, the Agency should not tier the DEIS off of them.

4.4.3 Management Theme Descriptions

Many of the respondents’ comments on the proposed rule’s management themes, in the context of the DEIS, are identical to those found in the context of the proposed rule itself. This is the case with other DEIS-related topics, as well. Thus, in general, only those comments that are substantively unique will be represented in this section, to avoid repetition.

Some respondents request that the Forest Service complete further NEPA analysis on IRAs designated as General Forest or Backcountry/Restoration, and others request that the Agency revisit fuel reduction prescriptions under the Wild Land Recreation and Primitive themes, to avoid misuse of timber harvesting. Because special interests are perceived as having influenced the decision to apply the General Forest theme to areas for which it may not be appropriate, some request that the Agency fully disclose and analyze the effects of development under the theme.

The most effective approach to evaluating cumulative impacts, state some respondents, would be for the Forest Service “to integrate all relevant management activities” with those of any given IRA management theme. Others are concerned with the effects on big game herds along State boundaries and on Yellowstone cutthroat trout, which are facing extirpation.

4.4.4 Role of the Implementation Commission

Because the Idaho Roadless Rule Implementation Commission may represent an illegal devolving of responsibility from the Federal government to the State level, respondents request that the Forest Service address the role of the commission. How the commission would be structured and would function are also key concerns. A couple of suggestions are to establish the commission as the body “responsible for reviewing Roadless Area projects in the Backcountry/Restoration management theme” and to establish it as “the body responsible for developing Roadless Area habitat projects in the Backcountry/Restoration and Primitive management themes.”

4.4.5 Impacts Analysis

Respondents suggest that, to comply with the definition of *significant* in the Code of Federal Regulations, the Forest Service should provide an analysis of significant impacts. Some further state that the Agency should analyze the maximum and predicted impacts associated with the alternatives, believing that the proposed rule will result in direct impacts. Others encourage the Agency to address all relevant concerns, to use fair and unbiased evaluations, and to use current data in impact analyses. Effects to be analyzed are directly associated with oil and gas leasing and development, road construction, phosphate mining, and timber harvest, assuming robust as opposed to minimal development. Potential future Alaska National Interest Lands Conservation Act claims are also of interest, as they constitute “a reasonably foreseeable action.” Respondents also are seeking to understand the comparative effects on Wilderness characteristics and potential designations between the 2001 Roadless Rule and the proposed rule.

Projections of Development

Perceiving that projections for minerals activity, road construction, and timber harvest are underestimated, and that the projections are based on faulty assumptions, respondents request that the Forest Service reconsider these projections to ensure accurate analysis of their effects.

Phosphate Mining

Respondents encourage the Forest Service to use current data in impact analyses of phosphate mining, to incorporate “recent research regarding selenium concentrations.” More realistic identification of mining impacts of the proposed rule is a concern of many respondents. They believe it is essential that the Agency do a better job of assessing the impacts of mining on native fish, wildlife, humans, and economic factors. Accurate estimation of the effects of phosphate mining is perceived as crucial, particularly in that current mining practices “are not likely to result in reduced impacts over past practices.” Indeed, many respondents believe that anything short of a cumulative analysis of phosphate mining is “unconscionable,” given the high stakes in terms of ecological and human health. Some call for disclosure of the cost of reclamation of retired phosphate mines and how the cleanup will be funded. Independent analysis of expansion

beyond current mining lease boundaries is considered desirable, and full disclosure of the extent of current selenium contamination is sought.

As part of disclosing the effects of selenium contamination, some respondents request that the Forest Service clarify the definitions of *near term* and *long term*. Economic analysis should include the impacts of Superfund sites that resulted from past mining activities, say others, including the contributions of ecotourism on local economies.

Oil and Gas Development

As some respondents foresee oil and gas development occurring under the proposed rule, they maintain that the Forest Service should analyze the potential resulting impacts. One specific request seeks an explanation of the rationale for opening areas in the Targhee National Forest to oil and gas development and an analysis of the potential impacts.

Alternative Energy

Many respondents would like to see the Forest Service consider increasing their emphasis on developing alternative forms of energy. Some request that the Agency consider the impacts of wind projects, which they believe to be a reasonably foreseeable action. Others suggest it would be reasonable for the Agency to analyze how the proposed rule would “affect access to biomass utilization and the effects of biomass utilization” on IRAs. The Agency is advised not to rely on Forest Plans for analysis of geothermal effects. In fact, there is some concern about the possibility that the Agency might prescribe “permissive management” for geothermal development, based on terms such as “open and unrestricted” in connection with energy development and the lack of “scientific studies” regarding the effects of geothermal development on IRAs.

Road Construction

The effects of removing the distinction between classified and unclassified roads are of interest to some respondents, in the context of avoiding “user-created and overgrown roads” from being used as a rationale for future logging. An accurate accounting of motorized and non-motorized trails, say other respondents, is essential to an accurate assessment of impacts, as is an accurate estimation of the costs of maintaining roads for logging and other extractive or development activities, given the inadequacy of current funding. In fact, “realistic identification” of road construction impacts is requested, given the sense that “the projected amount of roadway to be built is likely much too low.” Evaluation of the potential impacts of temporary roads should include erosion, noxious weeds, motorized access, runoff and flooding, as well as a possible increase in human-caused fires and in the magnitude of those fires.

Respondents suggest that the Forest Service include “an approved, peer-reviewed method for constructing and decommissioning roads, “seeking a “near-zero impact” on the areas for any temporary road. Others state that the Agency should revisit the estimates for timber harvest and associated road construction, again believing that the associated assumptions are faulty and the estimates too low to be credible.

Timber Harvest

Before any specific timber sale is proposed, respondents request that the Forest Service realistically analyze all possible effects of the Idaho Roadless Rule, again citing suspect assumptions regarding human-caused disturbances and low-ball estimates. Identifying those IRAs where “the lack of high-value timber and difficult terrain limit harvest opportunities,” states one respondent, would help to establish a clearer picture of potential impacts. The impacts of “frequent timber harvesting and harvesting of large-diameter trees” should be analyzed, says another, given the lack of language limiting frequency and tree size in the DEIS. Noting the “minimal” nature of timber harvesting program impacts, a respondent suggests aligning the analysis more closely with “timber industry aims.” Aiming for greater accountability and accuracy, another respondent proposes that the Forest Service adopt the Government Accounting Office methods of evaluating costs of timber harvesting.

Fire and Forest Health

The Forest Service should provide an analysis of wildland fire use, according to some respondents who feel its absence is a fundamental flaw of the DEIS. Others assert that the Agency should disclose and analyze its “policies and plans regarding wildfire management,” and that it should reconsider “the use of timber harvest, road construction, and mechanical fuel treatments for forest health purposes.” Relying on “scientific evidence” when analyzing the relationship between road construction and fire suppression is essential, contend some respondents, because “roads are neither necessary nor sufficient for fire suppression.” Interested in viewing a comparison between the 2001 Roadless Rule and the proposed rule with regard to the effects of “changing the exemptions that permit timber harvest for forest health,” respondents request an analysis of same.

Water Quality

Respondents believe that it is important to include an analysis of impacts on water quality because the information provided is insufficient to assess them. Concerned about “significant declines in water quality,” some suggest that the Forest Service revisit the analysis of those effects specifically from timber harvest, road construction, and wildfire fuel management.

Recreation

Possible underestimation of projections of recreation activities is a concern, and the Forest Service is asked to revisit the analysis. Respondents encourage the Agency to provide analyses of the proposed rule on scenic quality and recreation, and particularly as the proposed rule would affect backcountry recreationists. Analyses of the cumulative impacts of road closures and of other issues that affect motorized recreationists also would be of interest, as would an analysis of the impacts of “expanded off-road vehicle traffic” under the proposed rule. One respondent requests that the Agency analyze the impact that “national foundation funding of environmental groups has on motorized recreation access to public lands,” and another seeks an evaluation of “Environmental Justice issues” to comply with “Departmental Regulation 5600-2.” Many respondents believe that guidance for recreation should be included, and they request that the Agency do the following:

- Ensure that traditional recreational motorized uses are not affected,
- Give direction to land managers as they exercise their discretionary authority,

- Eliminate confusion caused by inconsistent treatment about sections, and
- Avoid litigation by special interests.

There is also interest in reviewing the Forest Service’s “plans and definitions for dealing with mechanized development of fragmented lands,” particularly involving “decommissioning,” “rehabilitating,” and “closing mechanized development.”

Cultural Resources

The Special Areas of Historic and Tribal Significance management theme needs to be revised, say respondents, to include areas “supporting characteristics of importance to the Shoshone and Bannock people.” They remind the Forest Service to “exercise caution when sharing information about cultural resources,” to abide by trust obligations to protect this information. Also, a “holistic definition” of cultural resources is sought, as is full compliance with the National Historic Preservation Act.

Air Quality and Climate Change

Respondents view the role of IRAs in mitigating climate change as significant, for these areas’ purifying properties and their role as “scientific control areas” by which to understand the effects of the phenomenon, and thus request an analysis of impacts of activities allowed by the proposed rule on climate change. A discussion of the sequestration of carbon in trees should be included in the analysis.

Soil Resources

Respondents request that the Forest Service provide information regarding how the soils analysis was completed.

Terrestrial Species

The Forest Service should revisit and further evaluate the impacts on terrestrial wildlife to ensure protection of the subsistence rights of Native American Tribes and compliance with NEPA, NFMA, and the ESA. Respondents maintain that thorough analyses should include all special-status species inhabiting the IRAs encompassed by the proposed rule, and that the analyses should be performed with greater specificity and quantification resulting in credible scientific findings. The following species are of particular interest.

- Grizzly bear (including possible delisting)
- Fisher
- Wolverine
- Elk
- Mule deer
- Lynx
- Marten
- Mountain caribou
- Greater sage-grouse
- Flammulated owls

The Forest Service is encouraged to consult with the USFWS regarding “all threatened and endangered species potentially affected by the proposed rule.” Clarification of how forest fires could affect grizzly bears is sought.

Aquatic Species

Because they believe that the proposed rule will have adverse impacts on aquatic species, and because Native Americans depend on anadromous species, respondents request that the Forest Service revise the related DEIS analysis. Compliance with the “hard look” requirement of NEPA is a concern, and there is a possibility of coordination with the USFWS, which is planning to conduct a Status Review of Bonneville cutthroat trout.

Botanical Resources

Respondents request that the Forest Service “acknowledge the different ways noxious weeds are spread, including by wind, water, and wild animals.”

Social and Economic Concerns

Clarification regarding how the economic analysis was conducted is sought by respondents who want to be sure that all effects were taken into account. Some request that the Forest Service assess “the economic value of non-commodity resources” such as fish and wildlife, while others believe that “a cost-benefit analysis” of the proposed rule would clarify the availability of monetary resources to address the rule’s impacts.

Cumulative Impacts

To avoid “deferring analyses to future fragmented documents” and to ensure compliance with NEPA, the Forest Service is encouraged to provide an analysis of the cumulative impacts of the proposed rule. Respondents submit that the analysis should include all areas under the Agency’s jurisdiction, to adequately address global climate change. Cumulative impacts of the Hardrock Mining and Reclamation Bill are of special interest, as are those of restrictions on motorized access, and of grazing, travel management, and wildland fire.

Native American Tribal Issues

Respondents suggest that, before initiating action that would affect Treaty rights, the Forest Service should initiate “nation-to-nation agreements” with the Native American nations. The Agency is reminded that it has a statutory mandate to maintain National Forests for Tribal members in “a sustainable manner,” and in partial fulfillment of that mandate, and to comply with Executive Order 12898, the Agency must analyze the effects of the proposed rule on Tribal lands and members. Other considerations are that Tribal members use IRAs for hunting, gathering, and religious purposes and that concerns regarding Tribal trust resources remain unresolved. A change in management of these lands must be analyzed, as must the proposed rule’s impact on cultural resources.

The Forest Service is encouraged to give more weight to the management theme requests of the Nez Perce Tribe, and to consider the Shoshone and Bannock people in the proposed rule and EIS, as no lands of importance to the Shoshone and Bannock Tribes are identified under the Special Areas of Historic or Tribal Significance theme. To analyze the effects on the Shoshone and Bannock people, an ethnographic study should be included in the EIS.

4.4.6 Use of Best Available Science

Whether the Forest Service used the “best available science,” as required by NEPA, in developing the DEIS analyses is a question posed by many respondents. The Forest Service is encouraged to base the proposed rule on the determination of “subject-area experts and scientists,” as well as to determine the “scientific parameters” required for adequate analyses. Independent scientific review of all planning and analysis should be conducted, state some respondents, and sufficient background data should be collected “to quantify existing conditions.” Others posit that the scientific findings of the Final EIS indicate retention of the 2001 Roadless Rule.

4.4.7 Alternatives Analysis

To comply with NEPA, the Forest Service is required to evaluate a range of alternatives. Respondents affirm that the least intrusive of the alternatives should be approved, in order to protect Roadless Areas. Specific requests for alternatives include those that would accomplish the following:

- Prohibit new mineral leases with all IRAs;
- Establish procedures and protocols for management activities that would affect threatened, endangered, and sensitive species;
- Protect municipal watersheds from development activities;
- Provide additional protection for water quality–limited stream segments.

Respondents request that the Forest Service disclose and evaluate the alternatives provided to RACNAC for fuels reduction in the Backcountry/Restoration theme, to possibly meet the purpose and need for the proposed rule. Others request site-specific analysis of how “the selected alternative would impact resources that are protected under existing Forest Plans.”

Alternative 1—The 2001 Roadless Rule

The Forest Service should adopt Alternative 1, say respondents, to accomplish the following:

- Keep existing protections,
- Reduce environmental impacts,
- Protect cultural resources,
- Preserve Roadless Areas for future generations,
- Provide for backcountry recreation,
- Support the outdoor recreation economy,
- Protect Roadless Areas from extractive uses,
- Ensure fiscal responsibility,
- Support sustainable ecotourism and non-motorized recreation-based jobs, and
- Protect ecosystems and wildlife habitat from industrial development.

Alternative 2—Existing Forest Plans

The Forest Service should modify Alternative 2, state some respondents, to allow road construction within one-half mile around existing leases.

Alternative 3—The Proposed Idaho Roadless Rule

Respondents favor Alternative 3 because they believe that it would:

- Provide “a multiple-use approach,” which “is better than a federally imposed approach”;
- Provide for “management flexibility”; and
- Ensure protection from wildfires.

Stating their opposition to Alternative 3, respondents say that the proposed rule would:

- Increase the maintenance backlog,
- Fail to adequately control erosion, and
- Cause “non-point source pollution.”

Some respondents would like the Forest Service to modify Alternative 3 by moving the acres assigned to the General Forest theme to the Backcountry/Restoration theme, in order to provide protection and allow for management activities. Others request that this alternative provide “adequate access to historic mines, cabins, and dispersed campsites and trailheads.”

4.4.8 Revisions to the Draft Environmental Impact Statement

The Forest Service should revise the DEIS to do the following:

- Analyze the impact on the settlement agreement involving the Clearwater National Forest,
- Analyze the impact of House Rule 1975,
- Allow the Tribes to adequately assess impacts, and
- Analyze the impacts of citizen outrage if the proposed Idaho Roadless Rule is adopted.

Respondents assert that the Forest Service should not “use community protection as an excuse for road construction and timber harvest,” as the Agency has successfully suppressed fires in IRAs. To eliminate the appearance of bias against the 2001 Roadless Rule, respondents suggest that the Agency include data from the 2000 Roadless Rule Final EIS.

Fire and Forest Health

Respondents suggest that the Forest Service “redefine and reevaluate the fire condition class” to clarify that a real problem exists. Others contend that the Agency should clearly define “the basis for effectiveness of actions proposed for reducing wildfires.”

Wildland Urban Interface

As data indicate that “very little Wildland Urban Interface actually exists” in Idaho, respondents suggest that the Forest Service reevaluate the extent of WUI areas in IRAs. Some request that the Agency revisit the definition and delineation of WUI, for the following reasons.

- WUI is too broadly defined.
- Reliable data and realistic maps must be used.
- Community protection needs must be better prioritized.
- Total acres of WUI may be exaggerated.

- The need for broad exemptions for road construction and timber harvest must be clarified.

Others request that the Forest Service map the intersection between fire regimes, fire condition class, WUI, and IRAs.

Maps

Respondents point out that including site-specific maps in the DEIS would allow the Forest Service to better meet the requirements of NEPA, and many state that they would benefit from maps that were more detailed and informative. Inclusion of such maps would:

- Allow effective impacts analysis,
- Correct errors in WUI locations and boundaries,
- Assist the public in evaluating the proposed rule, and
- Ensure that numbers are accurate and effects can be compared.

The Forest Service should “correctly identify and map ‘unauthorized’ roads,” say some respondents, because many of those roads were authorized under Revised Statute 2477. Others would like to view maps detailing the location of Bonneville and Yellowstone cutthroat trout habitat. Still others assert that, were the Agency to include maps that detail “current conditions and proposed changes,” the maps would:

- Provide legal descriptions of IRAs,
- Provide more adequate descriptions of IRAs, and
- Improve the effectiveness of the DEIS.

Technical and Editorial Changes

Among the requested changes and revisions, some respondents would like site-specific information incorporated into Appendix C, whereas others request that the information therein be presented with greater accuracy. Correction to “the special mapping area” for the French Creek IRA in the Payette National Forest is requested, as French Creek was found to be “unsuitable for Wild and Scenic River status.” Because topography would make “a logical criterion for determining character,” the Forest Service should revise its roadless character criteria.

Some respondents request that the Agency include a glossary in the EIS, and others seek clear and comprehensive definitions for key terms such as *road*, *sustainable*, *forest health*, and many others. A clear definition of *Wildland Urban Interface* is requested, as is an explanation for how the percentage of Roadless Area is calculated.

4.4.9 Compliance with Other Laws and Regulations

The Forest Service should explain the changes to NFMA, NEPA, and the Wilderness Act that would result from the proposed rule because “the proposal weakens protections provided in Forest Plans.” Some respondents contend that the Agency should consider Revised Statute 2477 in the analysis of the proposed rule, to better understand “the impact on travelways” under the revised statute, because “only an Act of Congress can remove historic rights-of-way,” and to ensure that “legal access is preserved under the assigned management themes.” Other respondents encourage the Agency to comply with NFMA by addressing “concerns related to the Act,” performing “environmental analyses” for each IRA, and including more relevant

information that would allow the public to determine whether NFMA precedents have been followed.

4.5 National Forest Management and Resources

Many respondents made general comments about how they would like to see the National Forests managed, with many making specific comments about Roadless Areas, but many comments applied to the National Forests as a whole.

4.5.1 Protection and Management of Roadless Areas

Respondents who are concerned with the protection of Roadless Areas note that Americans are “overwhelmingly in favor of protecting the roadless lands” and that failure to do so would open the Agency up to potential litigation. Others point out that Roadless Areas are an important part of the national heritage and ask that the Forest Service protect these lands for the benefit of future generations. Further, they point out that these lands contain important cultural resources in addition to species with cultural importance to local Tribes. Others point to the ecological value of these lands and note that they provide both spiritual and human health benefits, including the potential for scientific and medical discoveries.

Others focus on the economic benefits that come from protecting Roadless Areas. They argue that resource extraction might result in short-term benefits but in the “long-term it harms our environment beyond repair.” In addition, they claim that the tourism industry provides more economic benefit to Idaho than the extractive industries do, and point out that preserving Roadless Areas could lead to increased tourism for Idaho’s rural mountain towns. Still others feel that Roadless Areas contribute significantly to the quality of life that “can be a strong factor in attracting and retaining top quality employees.” Others point out that the Agency would save money by reducing the number of roads because there is already an “estimated \$8.4 billion backlog needed for their maintenance and reconstruction.”

Many respondents are concerned with the effect of the extractive industries on Roadless Areas and the extent to which the needs of business are being given greater weight than the environment. Some point out that “the problems we are facing right now—global warming, pollution, deforestation—[indicate] that we are not living in balance with the earth.” They ask for the Forest Service to “to stop the rape and plunder of the earth now before it’s too late.” Many point out that the extractive industries have a history of causing environmental “degradation” that “will later require hundreds of billions to repair.”

Concern about the environment and the role that Roadless Areas play in preserving resources that extend beyond the boundaries of National Forest lands was expressed by many respondents. Many note the important role that Roadless Areas play “as carbon sinks and carbon filters” that helps provide a hedge against climate change. In addition, many note that these areas provide clean drinking water and clean air. Others focus on the importance of preserving biodiversity and reducing habitat fragmentation. Many are concerned with protecting threatened and endangered species, including the wolf.

Some respondents express concern that the failure to protect Roadless Areas might result in the degradation of water quality, which might have a resulting negative impact on fish. Respondents note “The last stronghold of these fish [endangered Chinook salmon] is the excellent habitat that we are blessed with in Idaho.”

Other respondents ask that the Forest Service protect Roadless Areas to reduce the risk of wildfire and insect infestation. Additionally, they note that “roads increase the opportunity for invasive exotics to infiltrate healthy forests.” Some respondents also point out that if property owners are responsible and ensure that their property is defensible in case of a wildfire, other efforts should not be needed; they note that “[t]he experts have spoken on this subject, dispelling the notion that building roads and cutting timber are necessary to prevent fire from taking my house.”

Recreation also is a reason many give for wanting to see Roadless Areas protected. Some want to see motorized recreation, while others ask that the quiet nature of Roadless Areas be preserved by restricting motorized access. Many note that Idaho is known for its high quality fishing and hunting and that Roadless Areas make a huge contribution to this: “Roadless Areas are main spawning/breeding grounds for the fish and game that supply the adjacent roaded areas.” Other respondents ask for the protection of “Idaho’s wild backcountry” because it is “a primary draw for visiting from other places.”

Some respondents note that protections for Roadless Areas are particularly important because State- and privately owned land tends not to be “unmanaged,” and “[t]hat increases the importance of the roadless lands on Federally managed ground.” While others argue that more management of lands already roaded would “produce more timber.” Further, others ask that the Forest Service take “into account the fact that sagebrush ecosystems are important as well as timber, even if they don’t produce lumber” because they provide critical habitat for the sage grouse. Others are concerned with maintaining populations of Yellowstone cutthroat trout.

While some respondents would like to see all Roadless Areas managed as Wilderness to protect them from timber harvesting, others want to see these areas actively managed to prevent forest fires and the contributions to global warming that come from those fires. Others support active management because they believe it is a better use of taxpayer funds, while some argue that many of the Roadless Areas are actually roaded. Concern about the decline in the population of mule deer leads others to argue for “controlled burn and proper forest management.” While still others point out that if we don’t manage our forests “wisely” we will end up “using the resources of other countries who are not conservation minded at all.”

Many respondents are concerned that the Forest Service is not looking at Roadless Areas on a regional or even a continental scale. They point out that to provide for unfragmented habitat and to effectively offset CO₂ emissions, larger contiguous Roadless Areas are needed. Further they point out that Roadless Area values “do not stop and start at State lines” and that many species cross over from Idaho to neighboring states.

4.5.2 Management of National Forest Lands

Many respondents ask that the Forest Service protect National Forest lands to preserve biodiversity, clean water and air, and sustainable habitat. One asks for protection of farms in addition to forests. On the other hand, some ask that the Forest Service ensure that multiple-use values are upheld even in the face of pressure from single-use organizations. As with the Roadless areas, respondents ask for National Forest lands to be managed actively to prevent forest fires. But others point out that “[b]ased on current personnel numbers and proficiency, plus a budget shortfall . . . , management actions are not achievable.”

Biological Resources

Respondents ask that the Forest Service provide protections for biological diversity, including the sage grouse and sharp-tail grouse. They also ask for the protection of riparian areas, particularly along the Snake, Clearwater, and Salmon Rivers to preserve native fish species.

Forest Fire and Forest Health Considerations

Respondents are engaged in a debate about how the Forest Service should best address the issue of wildfires. Some think that active management of forest lands is the only way to ensure that wildfires are reduced, while others argue that active management and timber harvest actually may be exacerbating the problem. Most, although not all, agree, however, that whatever the management strategy, they want the Forest Service to try to prevent forest fires. But there is no doubt that they do not agree on what the appropriate management strategy should be. Some argue that the natural fire regimes benefit wildlife and the Ponderosa pine and help to create healthy ecosystems, and so the Forest Service should limit firefighting efforts. Respondents are concerned about the potential for road construction in support of these efforts, arguing that in the most critical areas, the WUI, sufficient roads already exist. Further, they point out that the WUI areas are “[t]he places where we need to be spending our limited fire prevention budgets.”

Many respondents are concerned about the potential to use timber harvest as a method of contributing to forest health and fire prevention. They argue that timber harvest actually increases fire risks and that “forest[s] with large old trees ... are far more resilient to fire than logged stands.”

Road Construction Considerations

Respondents are very concerned with the impact increased road construction could have on National Forest lands. Some respondents do support the idea that road construction is necessary to address drought, fire, and insect infestations. However, many believe that further road construction should not be permitted. They cite habitat fragmentation, invasive species infestations, acceleration of erosion, and the diminishment of recreation opportunities, among others, as reasons for opposing road construction. Additionally, they point out that the Agency “does not have adequate budgets for patrolling unauthorized motorized use or to maintain the national \$10 billion backlog for needed road maintenance” of existing roads. Several respondents take issue with the concept of permitting “temporary” roads. They note that “[t]emporary roads are not temporary or ecologically benign,” and that they cause the same harm as permanent roads.

Timber Harvesting Considerations

Some respondents support the idea of increasing the levels of timber harvesting because they believe that timber harvesting helps reduce the devastation and frequency of forest fires. Others argue that without sufficient timber harvest “forest lands in question will, in fact, die.”

On the other hand, many respondents would like to see a reduction in timber harvest on National Forest lands. They disagree that timber harvest would reduce or prevent wildfires. In fact, they argue that timber harvest increases fire risk. They also point out that logging can increase erosion and floods, and may contribute to increasing global warming. Economically, they argue that in addition to the fact that timber sales do not pay for themselves, logging discourages tourism.

Some respondents ask that alternatives to logging be sought out and that if timber harvest is needed, the Forest Service should require selective timber harvesting by helicopter.

Mining Considerations

Respondents comment primarily on phosphate mining in Idaho, although a few make comments opposing mining generally. Those who comment on phosphate mining tend to have differing views on whether the Forest Service should allow phosphate mining. Many point out that phosphate mining makes a significant contribution to Idaho's economy and contributes to agriculture and food production throughout the nation. Respondents also point out that mining phosphate domestically eliminates the need to import this strategic mineral. Finally, they argue that mining companies are much better stewards of the environment than they were in the past. Several respondents specifically support phosphate mining in the Caribou-Targhee National Forest. They point out that the current Forest plan supports phosphate mining and that phosphate mining is permitted under the Mineral Leasing Act of 1920. They also argue that “[p]hosphate from the Caribou-Targhee National Forest provides available and affordable supplies of phosphate fertilizer throughout the western United States.”

On the other hand, many respondents are opposed to allowing phosphate mining in the National Forests. They argue that mining causes significant environmental problems and point to the 17 Superfund sites in Idaho that are the result of earlier phosphate mining activities. Concerns about selenium and the impacts on water, fish, and wildlife also are often cited as reasons for restricting phosphate mining. They argue that “[t]he phosphate industry must be required to conduct application processes, environmental impact statements, and public hearings prior to any future development of our public lands” and that the Forest Service should encourage farming methods that don't require phosphate in order to “reduce the need to destroy our remaining lands.”

Some respondents also specifically comment on their opposition to oil and gas development, because of the environmental effect and because they do not believe that taxpayers should be subsidizing this industry.

Alternative Energy

Some respondents ask that the Forest Service encourage development of alternative energy sources to avoid “environmental devastation.” Some specifically recommend that the Forest Service support geothermal energy. But others point out that geothermal energy has environmental consequences as well and ask that the Forest Service not support it. In addition to the environmental impacts of geothermal energy, respondents oppose it because of the potential conflict with Tribal rights.

Industrial Clean up

A number of respondents argue that the Forest Service should force the mining industry to “completely remediate the existing mining sites, determine the actual costs of cleanup, and collect compensation from the owners of these phosphate mines before allowing additional NFS acreage to be accessed and mined.”

Grazing

A few respondents comment on grazing, with some arguing that grazing benefits helps to minimize grass fires; others argue that grazing is environmentally destructive.

Recreation

Concerns about recreation range from requesting more restrictions on motorized vehicles, to support for increased access for motorized vehicles. Some want to see Roadless Areas protected from roads, noise, and off-road vehicle abuse, while others argue that limiting motorized vehicle access would negatively affect local businesses, and that past closures have discriminated against motorized recreationists. Respondents also ask for restrictions on mountain biking and support of hunting in Idaho.

Air Quality

A few respondents ask that the Forest Service increase the monitoring of air pollution to better assess the health impacts of wildfires.

4.5.3 Social and Economic Considerations

Many concerns raised by respondents related to social and economic issues frequently overlap concerns about protecting the environment, the appropriateness of opening forest lands to extractive uses, and the best uses of National Forest lands.

Whether respondents support the proposed rule or oppose the rule, they cite the impact on the Idaho economy as a reason. Those who support the proposed rule tend to believe that logging, mining, and motorized recreation are important contributors to the economy of the region, stating “this will help the economy in Idaho.” Opponents claim that non-motorized recreation and eco-tourism generate more economic value for the state than do extractive industries. Further, they encourage the Forest Service to support employers that are not part of the extractive industries because they provide jobs that “pay well” without damaging the environment. Following this line of thought, some respondents point out that the economic benefit of the extractive industries is by its nature short-term because “[t]here is no eternal source of lumber and minerals.” Further, they argue that “[i]nvariably, these companies will move on, leaving the local economy depressed and the landscape pillaged,” and without the funds to address the environmental damage left behind.

Respondents writing in opposition to development of National Forests for economic benefit note that recreation based tourism “is more sustainable and provides broader economic benefits for Idaho.” On the other hand, some respondents suggest that the Forest Service should be encouraging the timber industry to use “sustainable forest stewardship” as a way to eliminate the “boom and bust cycle created by clear cutting practices.”

Others ask that the Forest Service support development of alternative forms of energy and building materials in order to limit the destructive demands that are placed on the National Forests.

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Appendix B: Coding Structure

Appendix C: Public Concerns List

Appendix D: Demographics

Appendix E: Organized Response Report

**Appendix F: Public Meeting Opening Address by Governor Risch,
January 14, 2008**

Chapter 1: Rulemaking Process, Public Participation, and Agency Involvement

Rulemaking Process

General Considerations

1-1 Public Concern: The Forest Service should not use the Administrative Procedures Act to modify the 2001 Roadless Rule.

BECAUSE IT IS AN INAPPROPRIATE USE OF THE ACT

I did have a point to make that I wasn't able to make in the three minutes I was allotted. That went to the legitimacy of the basic idea behind this rulemaking. This rulemaking is what lawyers know of as a Section 553 rulemaking under the Administrative Procedures Act. That section gives any citizen of the country the right to petition his government, and to have that petition considered in the context of an informal rulemaking. Now what this basically is, is an end run around the normal rulemaking procedure that had been followed, that resulted in the Clinton Roadless Rule back in 2001. Back in 2001 this process had been carefully and methodically explored, and the result it seems to me is far more legitimate than the result that is going to come out of this different procedure that is resulting in this Idaho Rule. The Clinton Rule had over, if my memory serves me, a million comments or close to that. And if my memory serves me correctly, three quarters of those comments were in favor of the Roadless Rule as it had been adopted at that time. I don't know how many years went into the formulation of that Rule, but my understanding was it lasted from the beginning of the Clinton administration all the way to the end. All of this careful and deliberate and ordinarily legitimate process is now to be overturned by the end run of the 553 rulemaking. (Individual, #218.122.10000.720)

BECAUSE IT WOULD SET DANGEROUS PRECEDENTS

The use of the Administrative Procedures Act to log and mine Roadless Areas in Idaho, if successful, will set dangerous precedents for the rest of the nation's Roadless Wildlife Habitat Areas. (Individual, #14.4.22118.130)

The Bush Administration is employing a new back-door plan to subvert the present policy of protecting Roadless Wildlife Habitat Areas towards a policy of extracting the timber and minerals from these critical areas. The state has petitioned (Petition of Governor James E. Risch for Roadless Area Management in Idaho, October 5, 2006) the federal government through a law previously not used in the fight to log and mine our precious Roadless Wildlife Habitat (5 U.S.C. 553 of the Administrative Procedures Act, 1.28 of Title 7). The use of this Administrative Procedures Act, if successful, will set dangerous precedents for the rest of the nation's Roadless Wildlife Habitat Areas. (Individual, #18.1.22118.130)

1-2 Public Concern: The Forest Service should implement the Idaho Roadless Rule in a timely fashion and continue to include county commissions in the process.

BECAUSE THE PROCESS USED TO DEVELOP THE RULE WAS SOUND

On behalf of the Idaho Association of Counties ("IAC"), I write to support timely issuance of a Final Rule to implement the State of Idaho Petition regarding management of Inventoried Roadless Areas (IRAs) on National Forests in Idaho. The development of the Idaho Petition was thorough and inclusive, and involved county commissioners throughout the process. From the beginning of the State Roadless Petition process, Idaho has been a model to other states in involving local government and engaging local communities throughout Idaho.

Lead county commissioners in each National Forest in Idaho spearheaded the effort to involve local communities in the Petition development process. The lead county commissioners contacted other county commissioners in the forest region to schedule community meetings and gather public comments. Through this process, interested individuals had an opportunity to voice their opinions regarding management of individual IRAs. Utilizing the public comments and their knowledge of the local community, county commissioners worked together in developing recommendations that were incorporated into the Idaho Petition.

On behalf of Idaho's counties, I ask that county commissioners continue to be involved as active participants in the rulemaking process as well as in the implementation of the Final Rule. I ask that the rulemaking process continue to reflect the Petition development process: a collaborative, local community-focused effort that addresses issues faced by counties that encompass and border IRAs, and which rely on resources and uses provided by these areas. (Regional/other governmental agency (multi-jurisdictional), Boise, ID - #6545.1.10200.061)

1-3 Public Concern: The Forest Service should continue to rely on the Roadless Area Conservation National Advisory Committee to provide advice and counsel.

Brundage Mountain Resort has been actively participating in this process from the very beginning. The National Ski Areas Association and Lt Governor Risch support our position regarding our proposed changes to the Rule. The NSAA [National Ski Areas Association] has a representative on the RACNAC [Roadless Area Conservation National Advisory Committee] Committee. We feel it is important for the Rule making body to continue to rely on RACNAC to provide advice and counsel as the State and the Forest Service continue rulemaking. (Special Use permittee, Mccall, ID - #1820.2.17000.001)

1-4 Public Concern: The Forest Service should be realistic about challenges to its proposal.

BECAUSE THE IDAHO ROADLESS RULE IS LIKELY TO GENERATE LAW SUITS

I appreciate the effort that is being made to resolve the Roadless Area issue in the State of Idaho. Unfortunately, this politically driven, top-down program/issue continues to be left with more issues than realistic solutions. Having been involved with it beginning with the initial RARE I [Roadless Area Review and Evaluation] assessment, followed by RARE II and then the re-assessment, I thought I understood what the effort was about. Then came the development of a legacy (something other than a green dress), plus litigation, legislative revision and court interpretations; it has developed a life of its own. The real question is whether the judicial process is settled sufficiently so that a decision will stand. Maybe a more appropriate assessment would be to determine how much money has been raised and spent by environmental groups simply fighting or in some way trying to adjudicate this issue. (Individual, #760.1.20000.140)

1-5 Public Concern: The Forest Service should wait to act until the legal uncertainty surrounding the 2001 and 2005 Roadless Rules is resolved.

TO ENSURE THAT MANAGEMENT OF ROADLESS AREAS CAN CONTINUE TO BE CONSISTENT WITH FOREST PLANS

The legal status of both the Clinton and Bush Roadless Rules remains uncertain. Residual legal uncertainty regarding the fate of the RACR [2001 Roadless Rule] needs to be resolved so that the on-the-ground management of Roadless Areas can continue consistent with existing Forest Plans. (Mining Industry/Association, Boise, ID - #1795.1.20000.160)

1-6 Public Concern: The Forest Service should abide by the court ruling that set aside the 2005 Rule.

I am also disappointed that the Forest Service has chosen to move forward with a flawed process that has been set aside by the Federal courts (September 20, 2006 Decision by the Northern district of

California). How can Judge Laporte's decision be ignored by the Agency? Four states, two of which are neighbors of Idaho and will directly be affected by Idaho roadless decisions are party to this lawsuit and decision. (Individual, #1482.14.22100.140)

1-7 Public Concern: The Forest Service should ask a Multiple-Use Review Board to review all past travel management decisions.

TO DETERMINE WHETHER THE NEEDS OF MULTIPLE-USE AND MOTORIZED RECREATIONISTS HAVE BEEN ADEQUATELY CONSIDERED

Motorized recreationists are very concerned that a reasonable alternative will not be adequately addressed in the environmental document and decision-making and that the process is predisposed. To prevent this from happening again, we [Capital Trail Vehicle Association] request that a Multiple-Use Review Board look into all past travel management decisions within public lands to determine whether all decisions have adequately considered the needs of multiple-use and motorized recreationists. Where decisions have not adequately considered the needs of multiple-use and motorized recreationists, we request that the reasons be identified and that corrective actions be taken. (Motorized Recreation, Helena, MT - #168.337.10000.530)

1-8 Public Concern: The Forest Service should make land management decisions based on the best interests of the public.

NOT ON WHAT IS LEAST COSTLY

Agency decision-making is being driven by accepting actions that will not be challenged in court versus decisions that are in the best interests of the public or that would meet the public's needs. For example, the January 21, 2004 Missoulian newspaper quoted Lolo Forest Supervisor Debbie Austin, "'Then, too, it's probably not worth taxpayer dollars to propose a big-acreage, big-ticket salvage sale that's likely to be challenged in court,' she said." The ethics of making decisions that are in the best interest of the public and that meet the needs of the public must be restored regardless of the dollar cost. Failure to base our government on these principles will be devastating in the end and we must restore decision-making based on these principles. (Motorized Recreation, Helena, MT - #168.140.10000.127)

1-9 Public Concern: The Forest Service should develop a process that is likely to result in robust management recommendations.

We [Coeur D'Alene Tribal Council] invite the USFS to develop a process that is likely to result in robust management recommendations. (Tribal Government/Elected Official/agency, Plummer, ID - #1696.20.10000.001)

1-10 Public Concern: The Forest Service should develop a process that recognizes and honors the desires of a diversity of governments.

We [Coeur D'Alene Tribal Council] invite the USFS to develop a process that recognizes and honors desires of a diversity of governments. (Tribal Government/Elected Official/agency, Plummer, ID - #1696.19.10000.020)

1-11 Public Concern: The Forest Service should bolster its legal staff by retaining private law firms.

TO HELP DEFEND THEIR MULTIPLE-USE LAND MANAGEMENT DECISIONS

The Agency should bolster its legal staff by retaining private law firms to defend their multiple-use land management decisions. (Motorized Recreation, Helena, MT - #168.32.14200.160)

1-12 Public Concern: The Forest Service should not rate their managers according to board feet of timber sales.**TO PLACE A HIGH VALUE ON STEWARDSHIP**

Forest Service managers are rated according to board feet of timber sales. This must be changed to place a high value on stewardship. (Individual, #554.5.42000.23)

1-13 Public Concern: The Forest Service should require that some Agency staff participate in off-highway vehicle recreation.**TO UNDERSTAND THE NEEDS OF MOTORIZED RECREATIONISTS**

We [Capital Trail Vehicle Association] request that an adequate number of Agency staff be licensed and safety trained to operate OHVs [off-highway vehicles], have an adequate number of OHVs for their use, and spend an adequate amount of time riding OHVs along with OHV recreationists so that they can understand the needs associated with motorized access and motorized recreationists. (Motorized Recreation, Helena, MT - #168.243.14000.530)

*State and County Involvement in Management of National Lands***1-14 Public Concern: The Forest Service should follow State involvement in rulemaking with national congressional deliberation.****BECAUSE ELECTED REPRESENTATIVES SHOULD REMAIN ACCOUNTABLE FOR DECISION MAKING**

Negotiation to change these [rules] should be done state by state followed by National Congressional deliberation. I want my elected Reps [representatives] to be accountable and stop this "in committee" non-voting decision making. (Individual, Appleton, WI - #4415.2.10100.110)

1-15 Public Concern: The Forest Service should leave National Forest rulemaking to the states.

Leave it to the states to decide what is best for themselves. Time to get rid of the Roadless Rule. (Individual, #967.1.20000.123)

1-16 Public Concern: The Forest Service should give the people of Idaho a say in the management of public lands.**TO PROVIDE BALANCED MANAGEMENT OF THESE LANDS**

I believe it is increasingly more important for States like Idaho to have a say in the balance[d], and I stress balance[d], management of our lands and our natural resources. When I say state of Idaho, please understand that I mean the citizens of Idaho. Politicians and special interest groups in Washington DC, and California seem to have the political and financial power to mandate what is best for Idahoans. For reasons unknown to me, some of these people say they speak for all Idahoans. I am here to claim my own voice in this matter and to speak for myself. (Individual, Pocatello, ID - #9174.1.10110.050)

BECAUSE PEOPLE WHO DON'T LIVE IN IDAHO SHOULD NOT MAKE DECISIONS FOR IDAHOANS

People who don't live in Idaho should not make decisions for Idahoans. (Timber or Wood Products Industry or Association - #9136.4.10110.001)

I want the people of this country to understand that Idaho does not belong to them, Idaho belongs to Idahoans, and especially those Idahoans who have spent generations working, living, and enjoying this State. We're willing to share Idaho, but at least, we have earned the right to have a say in how that land is managed. (Individual, Pocatello, ID - #9185.3.10110.061)

1-17 Public Concern: The Forest Service should allow the State of Idaho to manage lands in Idaho.

BECAUSE IDAHOANS SHOULD HAVE A GREATER SAY THAN SPECIAL INTERESTS OR THE FEDERAL GOVERNMENT

I believe that the State of Idaho and its people have the right to manage their lands, not by special interest groups, not by pressure from the government in DC. (Individual, Pocatello, ID - #9160.1.10110.001)

I have traveled around the country enough to know, and hunted in other states enough to know, that all Forest Service ground shouldn't be managed the same. We should have the opportunity to manage that in Idaho as Idahoans. I don't like the Federal Government managing the wolves the way they like without my say as an Idahoan. I don't like them managing the water. I would not like them to manage the National Forests and the Roadless Areas. I want to have the say as an Idahoan [about] what goes on in Idaho. (Individual, Pocatello, ID - #9206.1.10110.061)

1-18 Public Concern: The Forest Service should work with the State to manage Roadless Areas.

I'm pleased to see that the Forest Service has recognized the importance of the State government in partnering and managing the actual plans and natural resources, especially [those] that apply to the management of inventory of Roadless Areas. (Individual, Soda Springs, ID - #9187.1.10110.001)

1-19 Public Concern: The Forest Service should not delegate its authority to State governments.

BECAUSE IT WOULD BE AN IMPROPER DELEGATION OF AUTHORITY

The proposed change in management of the National Forest Service lands, at the request of the State of Idaho, is an improper delegation of authority from the USDA [U.S. Department of Agriculture]. The National Forests were withdrawn from the States and maintained as Federal property, under Federal agency management. Property that is under the management of the Federal government must be managed in accordance with the intelligible principles laid down in an agency's organic act. In the mandate that guides the forest system management, the National Forest Management Act, there is a requirement for the Forest Service to manage the nation's forest to provide for multiple uses, sustainable in perpetuity. One purpose of Federal management [is to] provide for multiple uses, sustainable in perpetuity. One purpose of Federal management over National Forests is to avoid local interests irreparably damaging a resource that belongs to the citizens of the United States, in common. The Tribes are not aware of any express authority allowing the unelected officials of the USDA or the elected officials of the executive branch, to provide for State or local county management of national resources. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.3.10110.130)

Illegal devolution of authority: Governors have no jurisdiction or right of jurisdiction over National Forests. Furthermore, governors were not elected by all of the citizens who own the National Forests. They were elected by a tiny subset of Americans. In any case, these governors did not run on the issue of National Forest management, as it is not their responsibility. Furthermore, the State commission referred to [in] the NOI [Notice of Intent] has no authority to make decisions on public lands. The NOI suggests that this body will wield considerable influence and oversee implementation of any revised Rule in Idaho. (Individual, Potlatch, ID - #7994.4.10110.030)

BECAUSE THE FOREST SERVICE HAS A RESPONSIBILITY TO PROTECT ROADLESS AREAS

The USDA is not required by statute or other legislative act to accept the Petition of the State of Idaho as proffered. It is the sole responsibility of the USDA to manage the nation's forests for every citizen and maintain those pristine Roadless Areas for generations to come. The Petition by the State of Idaho usurps that responsibility so that mineral and timber development can occur on the few remaining

Roadless Areas in the State. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.18.10100.002)

BECAUSE THIS WOULD NOT BE IN THE BEST INTERESTS OF NATIVE AMERICAN TRIBES

The delegation of management authority over Federal lands to State governments will not be in the best interests of Tribes, the citizens of the United States and Idaho's Roadless Areas. This Rule change is unnecessary given the protections and management direction provided by the 2001 Roadless Rule, already in place. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.11.10100.100)

BECAUSE THE AGENCY DOES NOT HAVE THE AUTHORITY TO DO SO

The Federal Government cannot cede its authority over public lands to governors or States anymore than it can cede its authority to establish treaties with sovereign nations or cede its authority to guarantee constitutional rights to citizens. This action [Idaho Roadless Rule] is contrary to the constitution. This is merely a way to steal from the American people our natural heritage. This is just one of the early steps in a process to rob us of our rights as citizens. This Petition should be stopped. (Individual, Potlatch, ID - #7994.6.10110.121)

BECAUSE NATIONAL FORESTS BELONG TO ALL AMERICANS

NFS [National Forest Service] lands in Idaho are there for all Americans and should not be managed for the benefit of residents from a single State. Roadless Areas are best managed at the national level because the lands are paid for by taxpayers throughout the country, not just those living in Idaho. State governors have no jurisdiction over NFS lands. The Federal government cannot cede its authority over public lands to State governors. (Individual, Fifield, WI - #1715.4.10110.060)

USFS lands belong to all Americans. One state (Idaho) government should not have the power to decide the fate of all Americans' lands. It is a rights violation. (Individual, Coeur D Alene, ID - #4841.2.10100.125)

Roadless Areas in National Forests are national resources and your mission is to manage these resources from a national perspective and responsibility. (Recreation/Conservation Organization, Boise, ID - #1818.73.10100.127)

**BECAUSE THESE LANDS SHOULD BE MANAGED FOR THE GOOD OF THE MANY,
NOT THE SHORT-TERM PROFIT OF A FEW**

I have almost zero faith in the State Legislature to protect Idaho's resources. Just look at their appalling history with selling out the citizens of the State to (silver) mining interests who then moved off shore to avoid their obligations to clean up superfund sites full of mine tailings. The birds and fish in Lake Coeur d' Alene are still suffering from the mess of toxic heavy metals left behind. Idaho's State government took actions to absolve Bunker Hill and increase allowable emissions even as tests showed children were losing brain function from the lead being spewed into the air. This may have been a few years back, but I don't trust them to this day.

You have the responsibility as a Federal agency to protect this resource for the nation and all its citizens, and even to protect Idaho from its decisions that are all too often weighted in favor of short-term economic gain for a few big corporations. Often those that have no ties to the State.

Please maintain the responsibility of the Federal government to manage these resources for the greater good of the many, not the short term profits of a few. (Individual, Port Townsend, WA - #8770.2.10110.720)

BECAUSE THIS IS A DANGEROUS PRECEDENT-SETTING DECISION

This current attempt to road and log vast tracts of the largest area of wildlife habitat in the temperate region of the U.S. [United States] will be the first time that any State has been given the job of deciding management activities for Federal property. This is a dangerous precedent-setting decision and needs to be debated and decided by the American public, not just the State that will happen to reap the most short-term economic benefit from the decision. (Preservation/Conservation, Lenore, ID - #6543.6.12000.123)

**BECAUSE THE STATE HAS NEITHER THE EXPERTISE NOR THE STANDING
TO PLAN MANAGEMENT OF NATIONAL LANDS**

The State of Idaho has neither the expertise nor the standing to plan national lands. Their proposed categories are misleading in name and road biased in description. (Individual, Ketchum, ID - #8064.1.10100.720)

BECAUSE A SINGLE AUTHORITY CAN PROVIDE MORE EFFECTIVE ADMINISTRATION

The Access Fund has brought to my attention plans by the Federal Government to release control of backcountry Roadless Areas to the States starting with Idaho. As an avid backcountry enthusiast, (backpacking, climbing, kayaking,) and as a search and rescue volunteer, I spend a great deal of time in wilderness areas of all kinds, including some vacation trips to Roadless Areas in Idaho. Preservation of these and other wilderness environments is critical for our country, and I believe that the continued administration under one authority allows more effective public input into how this preservation is maintained. Opening up regulation to the States will make it much, much easier for additional roads to be built, logging and mining operations to begin, and will be a large detriment to the splendor that these areas bring to their States and this country. I urge you to consider carefully the appropriateness of this action and to listen to your constituents and other concerned citizens. Maintaining these areas is of vital importance, and keeping them under Federal jurisdiction is one of the best ways to continue their preservation. (Individual, Santa Clara, CA - #8828.1.10110.200)

**TO ENSURE THAT THE FEDERAL GOVERNMENT FULFILLS ITS
TRUST OBLIGATION TO PROTECT TRIBAL RIGHTS**

The proposed rule was drafted with the help of the “Governor’s Roadless Rule Task Force” created by Idaho Executive Order 2006-44.

“The Task Force shall:

- A. Work with the US. Department of Agriculture and U.S. Forest Service in drafting the roadless rule for Idaho.
- B. Ensure that the spirit and letter of the Governor’s petition is achieved in the drafting and final federal rule
- C. Review the proposed rule and coordinate State comments in response to the draft federal rule.

The proposed Idaho Rule, by explicitly recognizing the Idaho Governors Roadless Rule Implementation Committee, institutionalizes the State of Idaho’s unwarranted influence over Federal actions within the Tribe’s homeland.

“. . . The Forest Service and the State anticipate collaborating on implementing this proposed rulemaking. This commitment is reflected in the Governor’s Roadless Rule Implementation Commission (Idaho Executive Order 2006-43), which is charged with the responsibility of working with the Forest Service to accomplish collaborative implementation of this proposed rule. (proposed Idaho rule, CFR, 73:4, p. 1136)”

The Tribe [the Coeur d’Alene Tribe] sees the Proposed Idaho Rule as an attempt by the State of Idaho to usurp Federal management authority. This would seriously impair the Federal government’s ability to fulfill its trust obligation to protect Tribal rights and values within our ceded territory. (Tribal Government/Elected Official/agency, Plummer, ID - #1696.10.20000.123)

**1-20 Public Concern: The Forest Service should retain authority to manage
National Forest Lands.**

**BECAUSE THE AGENCY HAS GREATER EXPERTISE AND CONCERN
FOR CONSERVATION THAN THE STATE OF IDAHO**

I very strongly believe that the National Forest Lands in Idaho should remain under the management direction of the Federal Forest Service. There would be nothing to gain and everything to lose in terms of experience, concern for conservation and efficacy of administration by placing 9.3 million acres of Roadless Areas in Idaho under the jurisdiction of that state. (Individual, Victoria, MN - #208.1.10100.023)

1-21 Public Concern: The Forest Service should abandon the state-by-state process.**BECAUSE IT CREATES EXPENSIVE ENVIRONMENTAL IMPACT STATEMENTS**

Real roadless protection: Rather than go through this fragmented and ridiculous State process, the USDA [U.S. Department of Agriculture] should embark on real roadless protection. This State process will produce a bunch of expensive EISs. Ironically, the current administration that complains of so-called analysis paralysis in National Forest management is engaging in unnecessary analysis by proposing to do an EIS for each State. (Individual, Potlatch, ID - #7994.7.20000.180)

1-22 Public Concern: The Forest Service should not divest National Forest lands from the ownership of all Americans.**BECAUSE SUCH ACTION IS BEYOND THE SCOPE OF THE EXECUTIVE BRANCH**

The National Forests are Federal lands owned by all of the citizens of the United States of America. The divestiture of these lands from all Americans is an un-constitutional taking of land beyond the scope of the executive branch of government. (Individual, #1064.1.22000.21)

1-23 Public Concern: The Forest Service should allow the State of Idaho to function as an intermediary to resolve road access conflicts.**TO PROVIDE PROMPT RESOLUTION OF ROAD ACCESS CONFLICTS**

To aid Idaho miners and the U.S. Forest Service in the prompt resolution of Idaho road access issues, we propose that the State of Idaho act as a local intermediary administrative body to provide the first level adjudication of road access conflicts between U.S. Forest Service and Idaho users. Any such administrative decision from the State of Idaho could, of course, be subject to further review by the Department of Interior/Agriculture. (Organization, #1822.5.10000.680)

1-24 Public Concern: The Forest Service should revise the management theme designations.**TO TAKE INTO ACCOUNT PREVIOUSLY PROVIDED PUBLIC INPUT**

The [County] Commissioners had proposed boundary and theme changes that were ignored [in the Idaho proposal]. This is very unfortunate since it involved public input from people very familiar with the areas. Specifically, Cuddy Mountain (016) was given a primitive theme when a combined backcountry and GFRG [General Forest Rangeland Grassland] assignment was requested. Council Mountain (018) was identified as an area where boundaries should be changed or a GFRG be given to areas on the east, north, and west boundaries so the Forest Plan 5.1 management prescription for the area be assigned. Only a small portion was to be retained in special area or primitive themes. In the Rapid River (922) area, the small portion of the roadless area within the watersheds of Bear and Lick Creeks specifically should be changed to GFRG or backcountry to blend with the current Forest Plan management prescriptions. Not taking these public officials comments seriously seems to support many of our citizen's comment, "They're going to do what they want anyway, and it doesn't do any good to say anything." (Individual, #762.14.23100.61)

*National Forest Management Philosophy***1-25 Public Concern: The Forest Service should return to its conservation and stewardship roots.**

The USFS should return to its conservation and stewardship roots. (Individual, Portland, OR - #2625.1.11000.001)

1-26 Public Concern: The Forest Service should manage National Forests with greater concern for ecosystem boundaries than political boundaries.

These lands [National Forests] should be managed with greater concern for natural ecosystem boundaries rather than political state boundaries. (Individual, Fifield, WI - #1716.6.11200.001)

1-27 Public Concern: The Forest Service should maintain National Forests through sustainable forestry initiatives.

Please allow our forestry and wildlife professionals to maintain our forest areas through sustainable forestry initiatives. (Individual, Hayward, WI - #3587.1.11000.001)

1-28 Public Concern: The Forest Service should use multiple use as a guiding principle in National Forest management.

We [Capital Trail Vehicle Association] request that the over-arching management goals for all multiple use public lands be to: manage multiple use lands for the greatest benefit to the public; manage multiple use lands in an environmentally sound and reasonable manner; manage multiple use land in a way that avoids the pursuit of environmental extremism; and manage multiple use lands in a way that promotes the shared-use that they were intended for versus segregated-use or exclusive-use. (Motorized Recreation, Helena, MT - #168.195.11100.002)

May I remind you that the multiple-use expectations of the National Forests include management for outdoor recreation and wildlife diversity. (Individual, Washburn, WI - #6062.2.11100.002)

I fully support the “multiple-use” concept of USDA [U.S. Department of Agriculture] USFS policy. Logging, mining, firewood gathering, grazing, and other uses are desirable and legitimate uses of the public domain. (Individual - #4365.1.11100.800)

TO ALLOW PHOSPHATE MINING WHILE PROTECTING THE ENVIRONMENT

I’m really disturbed by the fact that you’re either pro-industry and phosphate mining or you’re pro-environment. I believe that those two things can coexist together. (Individual, Pocatello, ID - #9197.1.11000.001)

TO ALLOW TIMBER HARVEST

Please continue to plan to harvest the forests. Please manage them under the multiple use system you were set up to do. Keep up the “Good Work.” (Individual, Clayton, NC - #2224.1.11100.160)

TO ALLOW TIMBER HARVEST WHILE PRESERVING ECOSYSTEMS

I want to see a stable and healthy economy in Southeast Alaska and Idaho that is partly based on logging. I also expect forest management that puts the health of the ecosystem first. (Individual, Spokane, WA - #4353.1.11000.260)

TO COMPLY WITH APPLICABLE LAWS AND PROVIDE FOR MOTORIZED RECREATION

Agency managers seem to be directed to close as much public land as possible to motorized visitors by a top-down management directive that is conflicting with the needs of the public for multiple-use access and recreational opportunities and contrary to the laws established by Congress. Congress has not designated this area to be Wilderness and existing congressional laws clearly intend for this area to be managed for multiple uses. Why are legally designated multiple-use lands being managed for limited-use instead of multiple use? The top-down closure directive is in violation of the will of the people and in violation of congressional laws. (Motorized Recreation, Helena, MT - #168.90.11100.002)

The most equitable management of public lands is for multiple uses. Congress has recognized this need with many laws including the Multiple Use Sustained Yield Act of 1960 (16 U.S.C. 528 et seq.) and National Forest Management Act of 1976. Multiple-Use was defined as “The management of all the

various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people....” Outdoor recreation is the first stated purpose of the act. Note that the pre-Columbian management scheme has not been enacted by Congress. Therefore, the Bureau of Land Management and Forest Service have a responsibility to provide recreational opportunities that meet the needs of the public just as government entities provide road, water and wastewater systems that meet the needs of the public. Public Law 88-657 states that “the Congress hereby finds and declares that the construction and maintenance of an adequate system of roads and trails within and near the national forests and other lands administered by the Forest Service is essential if increasing demands for timber, recreation, and other uses of such lands are to be met; that the existence of such a system would have the effect, among other things, of increasing the value of timber and other resources tributary to such roads; and that such a system is essential to enable the Secretary of Agriculture (hereinafter called Secretary) to provide for intensive use, protection, development, and management of these lands under principles of multiple use and sustained yield of products and services.”

The Federal Land Policy and Management Act of 1976 (FLPMA) states that “(7) goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise specified by law; and, (c) In the development and revision of land use plans, the Secretary shall - (1) use and observe the principles of multiple use and sustained yield set forth in this and other applicable law....”

The BLM Strategic Plan FY [Fiscal Year] 2000 to 2005 states that: “To achieve this mission, the Bureau of Land Management follows these principles: Manage natural resources for multiple use and long-term value, recognizing that the mix of permitted and allowable uses will vary from area to area and over time.”

Multiple-use management goals are the only goals that will “best meet the needs” of the public and provide for equal program delivery to all citizens including motorized visitors. All of [the] visitors have a responsibility to accept and promote diversity of recreation on public lands. Diversity of recreation opportunities can only be accomplished through management for multiple-uses and reasonable coexistence among visitors. Multiple-use lands must be managed for shared-use versus segregated-use or exclusive-use. (Motorized Recreation, Helena, MT - #168.117-118.11100.530)

1-29 Public Concern: The Forest Service should not use multiple use as the guiding principle in National Forest management.

BECAUSE THE FORESTS’ VALUE AS A HEDGE AGAINST CLIMATE CHANGE IS GREATER THAN AS A SOURCE FOR TIMBER, MINERALS, OR ENERGY

About 70 percent of the forest is open to multiple uses that degrade the important functions of the forest: habitat, watersheds, CO₂ sequestering process, wildlife, O₂ production, erosion control, climate stabilization, recreation and non-impact fuel jobs and economy. Its value to control climate change far outweighs its timber, mineral, and energy production. (Individual, Steamboat Springs, CO - #2996.1.11100.250)

1-30 Public Concern: The Forest Service should focus on renewable resources and conservation efforts.

We need to spend Federal money on renewable [resources] and on conservation efforts. (Individual, Grand Junction, CO - #6171.2.14100.001)

1-31 Public Concern: The Forest Service should focus on maintaining existing roads and educating the public.

I think funds would be better served maintaining existing roadways and educating the public about the proper way to treat our natural forest and land resources. (Individual, Boise, ID - #8069.2.14100.002)

1-32 Public Concern: The Forest Service should further fund enforcement efforts for existing roads.

BECAUSE THE CURRENT BUDGETS ARE NOT SUFFICIENT

There is no way to enforce laws in these areas [roaded forests] as the enforcement is stretched to its limits now. (Individual, Oakland, CA - #6721.8.16000.160)

I have spent a significant amount of time in Idaho's Roadless Areas and I have seen the negative impacts of unmanaged recreation stemming from existing roads. I know that the Forest Service does not have adequate budgets for patrolling non-authorized motorized use or to maintain the massive backlog for needed road maintenance within the Forest Service network of roads. (Individual, Ketchum, ID - #6785.8.16000.860)

1-33 Public Concern: The Forest Service should use gas tax revenues to support motorized recreation.

BECAUSE OF THE BENEFIT-BURDEN PRINCIPLE OF LAW

We [Capital Trail Vehicle Association] cite a common principle of law articulated in the Montana Codes Annotated "1-3-212. Benefit - burden. He who takes the benefit must bear the burden." We agree with that principle and the necessary obverse, "He who bears the burden must receive the benefit." We request that all gas tax revenue generated by OHV [off-highway vehicle] recreationists be returned to OHV recreationists for their benefit and used to address—through education, mitigation, enhancement, and development projects—all of the concerns and needs associated with OHV recreation....

[M]otorized trails are seldom maintained by the Agency even though motorized recreationists generate more than adequate funding through the collection of gas taxes. We request that corrective actions (an adequate mitigation plan) be taken to address [this and] to return all past and current off-road gas tax monies to OHV recreationists.

The lack of funding is often used as an excuse to avoid addressing problems associated with OHV recreation when in reality there is more than adequate funding. This is another example of the absence of a rational connection between the facts found and the choices made. Furthermore, the diversion of gas tax paid by OHV recreationists to other programs has contributed to many of the problems facing motorized recreationists. We request the evaluation of the impact and cumulative negative impacts that have resulted from the diversion of gas tax paid by OHV recreationists to other programs, including impacts associated with reduced OHV safety, education, mitigation, and development programs....

There are cases where OHV gas tax funding has been used to improve a non-motorized trail.

There are also cases where OHV gas tax money has been used to improve a trail and then that trail has been closed to motorized use. The use of OHV gas tax funding for non-motorized recreation is improper. We request that these cases be identified and that they be corrected by replacing motorized recreational opportunities that have been closed with new motorized recreational opportunities of equal recreational value. (Motorized Recreation, Helena, MT - #168.302-304.14100.530)

Influences on the Decision-Making Process

1-34 Public Concern: The Forest Service should use a decision-making process that complies with the law.

TO PROVIDE FOR ADEQUATE PROTECTION OF RESOURCES AND PUBLIC INVOLVEMENT

It seems that this current [Idaho rule making] process that has produced the Idaho Roadless Plan has replaced 25 years of public comments and the views of Forest Service professionals with the opinions of politicians who are influenced more by special interest lobbies. It is a political process not a land management or public process. I believe the process is flawed and represents neither the spirit nor the letter of the laws which govern the protection of the environment and the public input on these matters. (Individual, #1807.3.10440.57)

1-35 Public Concern: The Forest Service should resist the Bush administration's efforts to reduce protection of Roadless Areas.

So you Bushies are hard at [work] once more, in your unending efforts to milk every nickel you can from our suffering Nation's natural beauties! Shame on you! Your wicked efforts will be long remembered in infamy. Disgusting! (Individual, #45.1.10410.1)

The Bush administration in its last year will continue to try to destroy the environmental protection established under Bill Clinton. This administration has shown no regard for the environment or the risks to life, both human and wildlife. I would hope that the Congress would try its best to stop this assault. This wilderness is part of our heritage and even though I'm a city dweller and don't visit these areas, knowing that it exists as nature intended and that there are people who want to protect it gives me additional pride in my country. (Individual, #1255.1.10410.770)

BECAUSE THOSE EFFORTS ARE ILLEGAL

The acts by the Bush administration, to use administrative fiat to destroy wilderness areas, are essentially illegal and must cease immediately. (Individual, #447.5.10410.21)

BECAUSE THE DIVESTURE OF THESE LANDS FROM EFFECTIVE OWNERSHIP BY ALL AMERICANS IS UNCONSTITUTIONAL

The population of Idaho is approximately 1,460,000, yet Idaho contains 9,322,000 acres of inventoried roadless public land, more than any other state (excluding Alaska). I ask you, Mr. Dillard, why is it not a violation of the United States laws (that will remain unnamed for now) that emphasize and require public involvement, when the USFS's clear focus is on the input and desires of one-half of one percent of the people for an asset owned by 100 percent of the people? (Individual, #338.6.22100.60)

BECAUSE OTHERS WILL BE LEFT TO CLEAN UP THE DAMAGE

Having lived in Idaho, I would like to comment on the Bush administration's proposal to open Idaho's wilderness to mining, logging and other destructive industries. This should be seen as the last of a series of opportunistic policies by an administration that has already demonstrated itself to be morally and intellectually bankrupt. We already see profound changes to our ecosystem which are difficult to stabilize. This policy will do nothing to help. Opening up some of the last significant area of unspoiled wilderness in the continental US for short-term profit typifies the Bush administration's approach to policy making. Once the damage is done, the man responsible for this criminal act will be gone and leave the consequences for others to bear. It is time to take a stand against the persistent rape of wilderness areas because it is convenient for powerful special interest groups. (Individual, London - #7551.3.10440.200)

BECAUSE THOSE EFFORTS REPRESENT THE INTERESTS OF A MINORITY WHO WOULD PROFIT FROM THEM

The very idea that individual states have land communally owned by 304 million Americans within their borders is unique in the world. Bush, Rey and Kimbell will do anything to see that this ends. They don't see the National Forests as places for families to recreate and for people to escape the complexities of city life. Bush, Rey and Kimbell see hundreds of corporate moneymaking opportunities on these 192 million acres that in their mind are "going to waste" unless they are developed. (Individual, #338.5.10420.127)

I understand you are seeking voter input regarding Bush's proposed changes to the Roadless Rule. I do not want the proposed changes! Few would benefit now [, while] many, many, many would rue the day these changes were made, now [and] for generations to come. Our gifts are finite; don't squander them to line the pockets [of a] few. The land indeed belongs to all. (Individual, #816.1.20000.127)

It is important that the government understand that National Parks belong to all of the people. They were not meant to enrich special interests. They were set-aside as examples of unspoiled and unexploited land. This administration is leaving behind a legacy of shame. The concept of roadless wilderness is a

remedy to rampant mindless development. Undoing it can only lead to great harm. (Individual, #1046.1.20000.2)

By invoking the petition process, former Gov[ernor] Risch is attempting to execute another Federal lands giveaway to Idaho Republicans. I must remind you that the Idaho Roadless Areas of the National Forest System constitute a national resource-not a resource for a State-specific and provincial constituency of a small bunch of select local citizens. The only Idaho-specific motivation for this Petition is to provide another “free lunch” to Idaho Republicans. (Individual, #268.4.10110.59)

BECAUSE TAXPAYERS HAVE PAID TO PRESERVE THESE AREAS

I want you to know that I very much support Roadless areas. It is clear that the Forest Service is even under judicial surveillance for its Bush assault on the forests, which has been taking place for the past years of his administration. This is absolutely disgusting for the forests that taxpayers have paid to protect for years and years and years. Our children are being stolen from by [the] Bush administration corruption. (Individual, #2.1.10440.2)

BECAUSE THE ADMINISTRATION IS USING FEAR-MONGERING TO PROMOTE ITS AGENDA

The risk mapping on page 87 is ludicrous. Fears are manipulated, the same old tactic Bush has used over and over and over—pushing fear on U.S. citizens and that is the tactic employed in this plan. Fear—a fire might come. Fear—diseases and pestilence might come. This is wrong to push fear on Americans. “We have nothing to fear but fear itself,” Roosevelt said. Modern planners here are pushing fear so developers can run rampant and destroy places that can never be seen again. (Individual, #275.7.10440.23)

TO PRESERVE BIODIVERSITY

Biodiversity is needed for a healthy life for all. Please don’t allow the forest, home to countless animals, insects, microorganisms, etc., to fall victim to this administration’s sneaky profit schemes. (Individual, #381.5.41600.21)

BECAUSE SO FEW OF THESE AREAS ARE LEFT FOR FUTURE GENERATIONS

It is shocking that Bush is so hell-bent on destroying this country. There is so little left for future generations except astronomical debt and a third world infrastructure. (Individual, #547.5.10440.21)

What the Bush administration is doing is destroying a significant part of our children’s legacy. Once land has been mined and/or deforested, it will never be the same. It is outrageous that the most unpopular (and incompetent?) president in U.S. history will accomplish this feat of destruction. (Individual, #547.5.10440.21)

Do you ever wonder why the American public holds Congress and the President in such low esteem? I think it is because our national treasures have been put up for sale to the highest bidder and future generations will never know how beautiful our nation once was. They will only be left with the clean-up bill. (Individual, #1288.2.10440.20)

BECAUSE MOST PUBLIC RESPONDENTS SUPPORT COMPLETE PROTECTION FOR ROADLESS AREAS

I am very strongly opposed to the revision of the Roadless Rule proposed by the Bush administration. The fact that 95 percent of the 2.5 million individuals that have commented on the rule support complete protection of roadless areas doesn’t seem to matter to the Bush administration. (Individual, #910.1.20000.21)

BECAUSE THE ADMINISTRATION IS NOT REQUIRING PROOF THAT EXTRACTIVE BUSINESSES CAN CLEAN UP EXISTING PROBLEMS OR PREVENT ADDITIONAL POLLUTION

It is very disconcerting to me to think that the Bush administration, through the offices of the U.S. Forest Service, or any other executive agency charged with the management and protection of public lands, would consider any move to create such negative impacts as is proposed by the State of Idaho. When you have a bad situation, such as mining contamination, it is common sense to require that the

perpetrators prove that they can clean up existing problems, and actually prevent similar problems, before allowing them to break ground again. Statements of confidence are not proof, they are smoke and mirrors. In the IT business, we have an approach that we use with vendors of software. We require them to prove what their software will do today. We don't pay for what they intend for it to do tomorrow or next year. We call that vaporware. The Bush administration, the Forest Service, and the mining industry are trying to sell the American people vaporware. I urge you to abandon plans to gut the Clinton administration's Roadless policy. (Individual, #803.1.20000.720)

1-36 Public Concern: The Forest Service should resist efforts of politicians to make decisions about fish and wildlife issues.

BECAUSE THESE ARE BEST HANDLED BY STATE AND FEDERAL CONSERVATION DEPARTMENTS

I feel all fish and wildlife issues should be handled by State and Federal conservation departments. Politicians and politics should have absolutely no say in conservation issues. I believe in the flag and constitution, not politicians. (Individual, Bayfield, WI - #5930.2.10410.350)

1-37 Public Concern: The Forest Service should resist efforts to privatize public lands.

BECAUSE PRIVATIZATION IS AN ABRIDGMENT OF OUR DEMOCRACY

I am deeply troubled by the government's relentless desire to privatize public lands that belong to all Americans! What is equally disturbing is the fact that the government is intent upon concealing these efforts from public scrutiny. Mussolini once said, "Fascism occurs when the government and the corporation are but one." The privatization of public lands is just another nail in our democracy's coffin. I intend to notify all of my friends and associates about this confiscation of our public lands. (Individual, #1131.1.10440.127)

1-38 Public Concern: The Forest Service should not allow corporations to have undue influence.

Corporate profits should not take precedence over protecting our publically owned lands. The public interest has more claim to these lands than the interests of logging and mining companies. Shame on you for being party to corporate lobbying efforts to remove protections on these Roadless Areas. (Individual, Boise, ID - #8019.2.10420.127)

BECAUSE EXTRACTIVE INDUSTRIES CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS

I would like to voice my opposition to the roadless initiative. It seems pretty clear from attending the public comment hearing in Pocatello that it will only truly benefit corporate interests such as Simplot. It's time to stop giving business interests everything they want and start taking our well being into account. Part of that comes from maintaining a healthy environment. I have seen firsthand the effects mines have on the backcountry and it's disgusting. I have lived right alongside Simplot's Don Plant my whole life and smelled it's so called "Steam only" emissions; so strong I can sometimes actually taste sulfur. I have also seen public support for issues vastly superior to that of corporate interests and still the corporations win out again and again because legislators are apparently too weak to do what the public wants. (Individual, Pocatello, ID - #8779.1.10420.127)

BECAUSE THESE LANDS BELONG TO THE PUBLIC

These Roadless Areas reside in the public domain, national forestlands. These are owned by every single American, not simply Simplot and the phosphate industry. That's something I don't think a lot of people really fully consider. Yet Simplot thinks they have more of a right to this land than the average citizen who wants to use these lands for public recreation of all sorts (Preservation/Conservation, Idaho Falls, ID - #9144.3.10420.127)

1-39 Public Concern: The Forest Service should not allow motorized recreation groups to have undue influence.

TO PROTECT NATIONAL FOREST LANDS AND SPECIES

Do not bow to the interests of the ORV [off-road vehicle] or ATV [all-terrain] vehicle owners to open National Parks in Idaho's 9 million acres. Living in Southern California, we see firsthand the complete desecration of the Imperial Sand Dunes soil and removal of plants, which are desperately needed for survival by the desert dwellers such as the desert tortoises, which are endangered. There is life in the desert, contrary to what many people believe! These off-road vehicles will permanently damage the terrain and spoil the beauty of Idaho's National Forests. Like California, they will be greedy and want more of the land opened for these harmful vehicles. (Individual, Ontario, CA - #6715.5.10420.530)

1-40 Public Concern: The Forest Service should not allow the well-funded environmental groups to have undue influence.

BECAUSE THEY DO NOT REPRESENT THE MAJORITY OF THE PUBLIC

A November 2003 national voter survey by Moore Information (<http://www.cdfc.org/poll.htm>) reveals that most Americans agree that the scores of environmental groups in Montana and throughout the nation have lost their focus. Specifically, 61 percent of voters nationwide agree with the statement; "While protecting the environment is important, environmental groups usually push for solutions which are too extreme for me." Just 33 percent disagree with this, and 6 percent have no opinion. In the Mountain/Plains region that includes Montana, the divergence is even more severe. A full 71 percent of respondents agree with the previous statement, and only 25 percent disagree. Additionally, a poll by Market Research Insight (MRI) in December 2003 found that 27 percent of the public supported environmental groups and 53 percent opposed their actions.

In order to be true and responsive to the public, decisions should not be based on pressure from environmental groups and their litigation. Public opinion supports this position.

Environmental groups with substantial funding and paid staff are likely to provide substantial input to the process and to challenge the process through appeals and legal actions

This influence on the Agency's decisions must be balanced by the needs and opinions of the public for multiple use opportunities. Investigation of this balance will determine that the[se] groups . . . are out of line with the majority of the public's needs and interests. (Motorized Recreation, Helena, MT - #168.136-137.10420.051)

BECAUSE MOTORIZED RECREATIONISTS DO NOT PROPORTIONALLY PARTICIPATE IN THE PROCESS

The Agency must understand and accept that many motorized recreationists do not participate in the NEPA process. Therefore, the Agency should not be driven by the number of perceived participants and comments received. As originally envisioned and stated in law, the NEPA process should be driven by issues and needs, and motorized recreationists have significant issues and needs. Motorized recreationists believe and hope that the Forest Service as a public Agency will look out for their issues and needs in an even-handed way. In other words, as the process works now, the needs of largely unorganized motorized interests, including individuals and families, are largely ignored. The Agency must not be overly influenced by organized non-motorized groups and their significant lobbying, organized comment writing and legal campaigns. The Agency must adequately emphasize the needs of lesser organized and funded motorized recreationists by developing a motorized travel plan that addresses the needs associated with the numbers and popularity of at least 320,800 motorized and OHV [off-highway vehicle] recreationists. Current travel plans and proposals in Idaho do not meet these needs in a multiple-use area that is ideal for motorized use. (Motorized Recreation, Helena, MT - #168.31.10430.530)

BECAUSE THEY DO NOT SUPPORT REASONABLE USE

While we [Capital Trail Vehicle Association] respect other perspectives, one must also realize that the extreme ideals of the environmental groups, such as [that] the public should not be able to enjoy and use public lands, that everything should be wild, and that their use is the only reasonable use, are not

generally acceptable ideals for public policy nor are they supported by the laws. We are practical environmentalists who believe in a reasonable balance between the protection of the natural environment and the human environment, and we believe that the laws are intended to support this ideal. Our position is to restore balance, practicality, and fairness to the system. (Motorized Recreation, Helena, MT - #168.74.10420.700)

1-41 Public Concern: The Forest Service should make land management decisions that reflect the public's will.

As a citizen of the United States, I expect all Americans to have a say in Forest Service management and I know the vast majority of Americans want protection for these valuable resources. (Individual, #89.2.10430.1)

1-42 Public Concern: The Forest Service should give greater weight to the people of Idaho in the decision-making process.

I think the decision of whether to return to the original Roadless Rules should rest in the capable hands of the people of the great State of Idaho. (Individual, #55.1.10110.1)

TO BALANCE THE WEIGHT GIVEN TO THE COMMENTS OF PAID REPRESENTATIVES OF SPECIAL-INTERESTS GROUPS

To counter some of the comments of the ICL [Idaho Conservation League] member who is able to travel to all of the meetings and provide comments: I hope those comments of a paid state or a national representative of a special interest group does not carry as much influence as that of local comments. (Organization, #327.5.10430.61)

1-43 Public Concern: The Forest Service should give greater weight to Idaho counties in the decision-making process.

BECAUSE COUNTIES ARE THE MOST AFFECTED AND MOST KNOWLEDGEABLE

Adams, Idaho and Valley Counties recommended many IRA [Inventoried Roadless Areas] for management as 5.2. The original proposals made by the counties should be brought back into consideration. The counties that made comments are most affected and most knowledgeable regarding their areas. Their comments should carry a great deal of weight in this process. (Individual, #1825.46.10200.61)

We [Idaho Association of Counties] expect individual Boards of County Commissioners to provide comments to you directly about the treatment of particular IRAs in their areas in the proposed Rule and Draft Environmental Impact Statement. The Commissioners are the most informed and knowledgeable elected officials about the IRAs in or next to their counties and the needs of local communities and citizens. Please give their comments the great weight they deserve and be responsive to their recommendations and concerns in finalizing the Rule and Environmental Impact Statement. (Regional/other governmental agency (multi-jurisdictional), Boise, ID - #6545.15.10430.061)

BECAUSE COUNTIES ARE COMMITTED TO FOREST HEALTH

Management suggestions provided by county commissioners of counties particularly tied to Roadless Areas within their counties seem to hold little influence with groups that assigned themes to areas and made determinations about roads for dealing with forest health management needs or other concerns. As an appointed member of the Adams County Natural Resources Committee, they provided me with the information they used and the resolution provided the Governor's group. That is the reason I make the statement. For example, the Commissioners were very committed to making sure that the Roadless Areas of the county be capable of being treated for forest health concerns using roads when necessary; especially, for insects and diseases that may move outside the boundaries and jeopardize forest areas that are relied on by county residents. The Governor's proposal does not reflect that concern. The rule for the backcountry theme is far too restrictive with temporary roads to accommodate the forest health concerns the commissioners had in mind. (Individual, #762.13.20000.30)

1-44 Public Concern: The Forest Service should not give greater weight to the citizens of Idaho in the decision-making process.

BECAUSE DECISIONS ABOUT FEDERAL LANDS SHOULD BE MADE BY ALL CITIZENS

They [Roadless Areas] belong to the people of the nation, and indeed the world, not the State of Idaho. Decisions to destroy or protect them need to be made by the people of this nation. (Individual, #4.3.10110.63)

National Forests are the property of all Americans, not just the ones from the same state the forest is in. Idaho's governor has only as much say so as I do sitting here in Ohio about what to do with our National Forests, and I and millions of others who supported the 2001 rule say no roads. (Individual, #70.2.10100.123)

BECAUSE LOCAL DECISION-MAKING HAS NOT NECESSARILY BEEN MORE SOUND THAN FEDERAL DECISION-MAKING

I think that the Lieutenant Governor's comments made it clear that the rationale that he was offering to legitimize this process was the particular idea that the more local the decision-making can be, the more legitimate the result is going to be. I need to caution the Forest Service that that assumption can't bear too much examination because if you'll look at the historical pattern, the pattern has been that in land use decisions the people that live closest to the land affected in a very high percent of the cases take the shortest run view of what [use] that land ought to be put to, the purpose and uses it ought to be put to.

... And seems to me that if you want to examine the historical pattern, you'd be making a mistake if you let the opinion of the population that is immediately adjacent to these lands be the driving force and deciding factor in how they're going to ultimately be used because history shows the locals don't have a very good understanding of where their own interests lie. (Individual, #218.123-124.10110.61)

The interests of a small group of Idaho citizens (self designated as special, deserving, and knowledgeable) do not trump the national will. Your discourse about how local collaboration, local managers, multiple use (Idaho version), the Governor's Office, and trust between Agency officials and local citizens should be dominant in the management of Roadless Areas was strictly discriminatory. It can best be described as political deception and favoritism. (Recreation/Conservation Organization, Boise, ID - #1723.67.10440.063)

1-45 Public Concern: The Forest Service should resist the efforts of industry to reduce Roadless Area protection.

BECAUSE THE LONG-TERM HEALTH OF PUBLIC LANDS SHOULD BE PUT AHEAD OF SHORT-TERM PROFITS FOR A FEW

Please resist the temptation to allow greedy and shortsighted extraction industries to strip our national heritage for short-term monetary gain. Allowing additional mining and logging in the Roadless Areas is inconceivable. You are there to preserve and safeguard our wilderness areas for the greater benefit of all. Please keep that duty uppermost in mind. (Individual, #1082.1.10420.200)

There are already plenty of sacrifice zones on our national forests—arguably the majority of our public lands in the lower 48 are already sacrificed in significant ways. Please leave these last precious pieces intact, and take the urgings of various vested interests and their political allies with a due grain of salt. What they want is money, not the long-term health and survival of complex and in many cases quite rare ecosystems in our part of the Northern Rockies. (Individual, #98.3.10400.200)

All we have to do is look to the wooded areas of Central and South America and many areas of North America to see the end results of such "limited access" programs. Unfortunately, supporters of such programs in Idaho are only looking to line their own pockets with some kind of ill-gotten profit. We

cannot and must not allow any kind of change to take place in the existing Roadless Areas. (Individual, #178.2.10420.260)

TO PRESERVE AREAS FROM THE CONSEQUENCES OF GLOBAL WARMING

Corporate greed just doesn't "cut it" anymore. Americans all deserve a wilderness where it is quiet, and roads are nonexistent, and the ecosystems that haven't been ravaged by global warming continue to flourish. (Individual, #38.2.10420.206)

TO PROTECT ROADLESS AREAS FOR FUTURE GENERATIONS

Objections to your new Roadless Rule: You do not, apparently, believe in the Native American "Seventh Generation" philosophy, that you consider the impact of your decision on not just your generation but the seven that follow. As custodian and steward of our public land trust, you seem to be more concerned with enabling the timber and mining interests to increase their profits, with little or no expense on their part, than in caring for lands that belong to ALL the people of this country and maintaining their beauty and original character for future generations. The earth is NOT yours to use and destroy, nor are the country's public lands yours to give away and degrade. As one of the "owners" of those lands, I strongly object to your favoring corporate interests over the long-term interests of the people. How is it benefiting us to give away our rights to timber and mining companies who use and degrade the land with no respect for its future use or the quality of the water running through it. (Individual, #11.5.10420.740)

BECAUSE EXTRACTIVE USES CAN CAUSE SIGNIFICANT ENVIRONMENTAL DAMAGE

If anyone has doubts of the necessity for strong regulations protecting unspoiled areas of Idaho against businesses who have designs on opening those areas to commercial exploitation, I would suggest they visit two areas in the Northwest that are the embodiment of the ecological grief that can be the result of wresting natural resources from the earth. The first is Libby, Montana, where the mining of asbestos has caused severe medical illness and death in both the mineworkers and the townspeople, alike. The second is the Silver Valley around Kellogg, Idaho, where a century of mining and smelting has damaged local soils and contaminated surface water that ultimately flows into the Spokane River and on to the Columbia. Both of these areas are designated as Superfund sites under the EPA [U.S. Environmental Protection Agency] and have cost millions and millions in clean-up costs to date. When the companies involved in these two areas first opened the ground to mine the resources there, I'm certain there was no intent to do severe ecological damage to the environment. These companies provided stable, high-wage employment to workers and their families for decades, and the science of the time did not raise any red flags about health or environmental issues. But now we know the horrors that can be left behind when resources are mined in pristine areas. So when a large corporation like Simplot suggests that they can absolutely protect the water quality of southeastern Idaho streams if they are allowed to mine there, after already causing water pollution that killed dozens of sheep, I see nothing but red flags if the provisions of the Roadless regulations are relaxed or overturned anywhere in Idaho. By the company's own admission, it will take 10 years to correct the water pollution their activity has already created. Here, once again, it seems as if a company has the best of intentions toward the environment and has a plan to protect water quality in the future. But what if they are not able to do that in reality? What if this company is not in business in 10 or 15 years, when the full extent of damage done to the watershed is discovered? In the cases of the two Superfund sites described above, both the corporations involved were bankrupt when it came time to clean up after their mistakes. (Individual, #947.2-3.20000.2)

BECAUSE TAXPAYERS END UP PAYING THE COSTS

I'm not sure how anything can be called "protection" for something when everything that is up for discussion is yet another "weakening" of that protection. Corporate special interests are ruining every aspect of this Country, including "protection" for the (legal) citizens of this country who pay all the bills. My wallet and my environment need protecting and yes, I am watching. (Individual, #114.1.20000.57)

1-46 Public Concern: The Forest Service should work with motorized recreation groups to identify opportunities for off-road recreation.

BECAUSE DEMAND FOR THESE OPPORTUNITIES IS INCREASING

There is an increasing demand for OHV [off-highway vehicle] recreation opportunities on public lands. The BLM [Bureau of Land Management], Forest Service, as well as environmental groups, State and local governments, and OHV and recreational access organizations have all acknowledged that many Land Use Plans woefully failed to anticipate the increased public demand for all types of outdoor recreation and related OHV uses. Additionally, and importantly, the Bureau of Land Management's National OHV Strategy states: "Motorized off-highway vehicle use on public lands administered by the Bureau of Land Management (BLM) has increased substantially in recent years. . . . Some of [the factors contributing to growing OHV popularity] are: greater public interest in unconfined outdoor recreational opportunities; rising disposable income; advances in vehicle technology; the rapid growth of the West's cities and suburbs; [and] a population with an increasing median age with changing outdoor recreational interests.

This [[growing OHV]] popularity is evidenced by the fact that recreational enthusiasts are buying OHVs at the rate of 1,500 units per day nationwide, with nearly one-third of them doing so as first-time buyers." "[BLM's OHV] Strategy recognizes, as does policy outlined in BLM Manual 8340 (May 25, 1982), that off-road vehicle use is an "acceptable use of public lands wherever it is compatible with established resource management objectives." As established by the Federal Land Policy and Management Act of 1976 (FLPMA), the BLM is required to manage public lands on the basis of multiple use and sustained yield, while protecting natural values. . . . Motorized OHV use is now firmly established as a major recreational activity on BLM-administered public lands."

Unwisely, rather than work to accommodate the increased demand for OHV recreation, BLM and many National Forests have frequently reacted by restricting OHV opportunities. But more importantly, opportunities to manage OHV use by developing OHV trail systems, marking roads and trails, providing usable maps, identifying OHV trails and systems and entering into cooperative management agreements with OHV user groups have, by and large, been ignored by most Federal land managers. Although more pro-active management is clearly permissible within the existing management plans, a quick search on the BLM's and National Forest's [Service's] websites indicates that land managers more often choose to implement parts of their OHV policy associated with limitations and closures. The planning team should look to individuals and user groups for assistance in identifying opportunities for OHV recreation. (Motorized Recreation, Helena, MT - #168.80-81.10200.530)

Coordination with Native American Tribes

1-47 Public Concern: The Forest Service should have considered petitions from Tribal governments.

The 2005 Roadless Rule under which the Idaho Rule began development inappropriately conveyed responsibility for initial public involvement to the State of Idaho. The USFS decision to implement the Idaho petition under the Administrative Procedures Act after the 2005 Roadless Rule was invalidated by the Federal Courts and the decision to not consider petitions from Tribal governments and others interested in Roadless Area management is evidence of a Federal/State political alliance. (Tribal Government/Elected Official/agency, Plummer, ID - #1696.8.10000.040)

1-48 Public Concern: The Forest Service should consult with Native American Tribes on the Idaho Roadless Rule.

In October 2007, State of Idaho and Forest Service staff presented an update on the Idaho Roadless Petition process to the Nez Perce Tribal leadership. At that meeting, the Tribe expressed concerns about lack of consultation, indicating that the Forest Service, as an agency of the United States, has an obligation to work with the Tribe independently and on a government-to-government basis to ensure that a constructive, ongoing dialogue occurs between the two governments regarding the Rule and its potential implications for Tribal interests. (Government, #1819.8.10300.150)

**BECAUSE THE FOREST SERVICE MANUAL REQUIRES CONSULTATION WITH TRIBES
ON PROPOSED ACTIONS WITHIN A TRIBE'S CEDED TERRITORY**

The Tribe's [the Coeur d'Alene Tribe] relationship to the USFS is "unique and distinct from those that apply to other interests and constituencies served by the Forest Service (FSM 1563.1)." This relationship requires that USFS planning procedures incorporate early, meaningful consultation with Tribes on proposed actions within a Tribe's ceded territory. The USFS manual further defines federal trust responsibilities and directs the USFS to manage lands ". . . in a manner that protects Tribe's rights and interests in the resources reserved under treaty (FSM 1563.01d)." The USFS did not inform the Tribe of its intention to undertake a substantial action affecting the Tribal values they hold in trust until after it had been decided they were going to develop a Rule to implement the Idaho Petition. The USFS justified their lack of scoping by claiming there had been adequate public involvement in the prior development of the alternatives. The Tribe had no opportunity for meaningful input in defining the issues to be addressed or the development of the alternatives to be analyzed. (Tribal Government/Elected Official/agency, Plummer, ID - #1696.7.10300.720)

1-49 Public Concern: The Forest Service should ensure that it fulfills its trust responsibility to Native American Tribes.

TO COMPLY WITH TREATIES AND OTHER FEDERAL REGULATIONS

In the Fort Bridger Treaty of 1868 (Treaty), the Shoshone-Bannock Tribes reserved the right "to hunt on all unoccupied lands of the United States" [Footnote 1:Ft. Bridger Treaty, July 3, 1868, stating ". . . they shall have the right to hunt on unoccupied lands of the United States so long as game may be found thereon. . ." (Ft. Bridger Treaty, July 3, 1868, 15 Stat. 673)]. The 1867 Executive Order established the Fort Hall Indian Reservation, and the Treaty affirmed the reservation as the permanent homeland of the Shoshone-Bannock Tribes (Tribes). Federal laws [Footnote 2: Native American Grave Protection and Repatriation Act (cite), American Indian Religious Freedom Act (cite), are two examples of federal legislation mandating land management agencies to provide access to sacred sites for ceremonial purposes] provide for the practice of traditional cultural practices and ceremonies on federal lands and the protection of cultural/historical sites from undue degradation. Through these reserved rights, the federal agencies must uphold their Trust Responsibility [Footnote 3: Trust Responsibility is a term that has been coined to describe the unique relationship between the federal government and federally recognized Tribes. The term entails an obligation to protect, preserve and give due consideration to the interests of Tribes when making land management decisions] throughout the decision-making process, when there is a potential to affect those rights. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.21.10100.150)

**BECAUSE THE PROPOSED MANAGEMENT PRESCRIPTIONS PROVIDE
INADEQUATE PROTECTION OF CEDED TERRITORY**

The Idaho Rule is born out of a political alliance between State and Federal administrations with a record of hostility to Federal land ownership and management, undermining the trust obligations accepted by the Federal government in return for the cession of our aboriginal territory. The management prescriptions for the Roadless Areas in that ceded territory are substantively inadequate to assure protection of the values with which the Federal government was entrusted by the tribe. (Tribal Government/Elected Official/agency, Plummer, ID - #1696.5.22120.720)

**BECAUSE THE PROCESS USED TO DEVELOP THE IDAHO ROADLESS RULE
BREACHED THIS RESPONSIBILITY**

The State of Idaho, not having the trust obligations of the Federal government, made little effort to include Tribal values in their public comment process. The Forest Service's process in developing the Draft Environmental Impact Statement did not correct this breach of their trust responsibility to the [Coeur d'Alene] Tribe. (Tribal Government/Elected Official/agency, Plummer, ID - #1696.9.10300.020)

1-50 Public Concern: The Forest Service should reply to the comments of the Shoshone-Bannock Tribe in a letter detailing the response.

The tribes [Shoshone-Bannock Tribes] formally request that this comment letter be answered with a written response and hereby request further government-to-government consultations with the USDA [U.S. Department of Agriculture]. The response letter shall include a written explanation of the incorporation of the Tribe's submitted comments, along with a page number where they can be found, as well as rationale for any comment not incorporated into the final document. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.16.10300.001)

Public Participation

Scoping, Notification Process, and Comment Period

1-51 Public Concern: The Forest Service should start over with its scoping process.

BECAUSE THE SCOPING PROCESS WAS INADEQUATE

The Coeur d'Alene Tribe recommends that the USFS begin the process over by doing adequate scoping. (Tribal Government/Elected Official/agency, Plummer, ID - #1696.14.16000.060)

1-52 Public Concern: The Forest Service should improve the notification process.

BECAUSE PEOPLE WHO SHOULD HAVE BEEN NOTIFIED WERE NOT

I find the fact that I was not made aware of this scoping process extremely troubling. I made over 30 comments to the Idaho petition process (for all Roadless Areas within Clearwater and Idaho Counties, as well as a few others), and probably generated an additional 200 comments from other people. This is not the first time that I have worked on this issue. I have commented on Roadless issues since RARE [Roadless Area Review and Evaluation] I and successfully appealed more timber sales in Roadless Areas than most other people. I find it troubling that I was not on your mailing list for this scoping process. Troubling, but not surprising. (Preservation/Conservation, Lenore, ID - #6543.1.12000.720)

Residents in the Yellow Pine/Johnson Creek Area did not receive individual notification of the land status change around them, even though this is standard zoning procedure in the State of Idaho (Idaho Statutes, Title 67, Chapter 65). The result is that residents, including ourselves, did not know what the State was doing and we were not a party to the initial State process. (Individual, Yellow Pine, ID - #8773.5.12100.180)

I live in Boundary County, Idaho. I recently heard that our county commissioners were applying to expand the areas in this county which can be logged, mined and have roads built upon them. I heard about this through word of mouth as there was no official notification to the public. I must say this lack of public information makes me, as a property owner of this county, quite unhappy with our government officials. (Individual, Naples, ID - #8862.1.12110.030)

We live at 1700 Johnson Creek, nine miles south of Yellow Pine. We have received no direct communication regarding the Roadless Plan that is being considered, but have heard about it by rumor. I am concerned that residents who live closest to the affected area are not contacted regarding the plan. (Individual - #343.1.12500.061)

1-53 Public Concern: The Forest Service should increase advertisements for and extend comment periods.

The limited comment periods, which are largely unadvertised and certainly never appear in the media, are just another example of the government's relentless desire to cater to the interests of multinational mining and logging companies who would like nothing more than to have unbridled access to the resources on public lands. (Individual, #1131.2.12200.720)

1-54 Public Concern: The Forest Service should extend the comment period and should conduct public hearings throughout the country.

The comment period should be extended to ninety days, and the Forest Service should conduct public hearings at this stage of rulemaking at representative locations throughout the country. (Individual, #3.2.12000.1)

BECAUSE THE DURATION OF THE PUBLIC COMMENT PERIOD WAS INSUFFICIENT

This process is very hypocritical. The State of Idaho complained in court about the lack of public involvement in the 2001 Rule. That Rule had a much longer scoping comment period including public hearings. Now that Idaho is illegally in control of Federal public land policy, on lands owned by all Americans, there is a short comment period with no public hearings. (Individual, Potlatch, ID - #7994.25.10440.060)

TO ABIDE BY THE AGENCY'S MISSION AND DEMOCRATIC PRINCIPLES

Your contentions that the Agency believes that additional public meetings outside the State of Idaho or an extension of the comment period were not necessary constitute a manifest rejection of your national mission and the democratic principles of our country. (Recreation/Conservation Organization, Boise, ID - #1723.32.12000.100)

*Public Meetings***1-55 Public Concern: The Forest Service should hold a public meeting in Moscow, Idaho.****BECAUSE MANY WERE UNABLE TO ATTEND MEETINGS HELD IN GRANGEVILLE OR LEWISTON**

Please hold a meeting in Moscow, where there are many people who feel strongly about this issue but who may find it hard or impossible, as I would, to get to Grangeville or even Lewiston. Let democracy work the way it's supposed to work, and come to where the people are [able] to truly listen to what they are saying, on all levels. That is the first step in awakening to the genius of listening and mimicking the survival recipes in nature—deep listening to one another. (Individual, #4.7.12120.110)

1-56 Public Concern: The Forest Service should reschedule the public meeting held in Lewiston, Idaho.**BECAUSE POOR WEATHER PREVENTED MANY FROM ATTENDING**

I planned to testify at tonight's roadless hearing in Lewiston (1/29/08). Due to hazardous driving conditions, the Idaho Department of Transportation advises against traveling, so I will not be driving from Moscow with my family. I believe many people will not make it the meeting tonight, so I request that you reschedule the hearings for a later date to ensure adequate public participation in this important process. (Individual, #212.1.12120.61)

1-57 Public Concern: The Forest Service should hold more public meetings in Idaho and in neighboring states.

TO ENSURE THAT AFFECTED CITIZENS HAVE A REASONABLE OPPORTUNITY TO PARTICIPATE

This EIS process does not even allow convenient testimony from many of the most affected communities in Idaho. Those people from the high recreation usage areas of Moscow and Sandpoint, Idaho, for example, will be required to drive for a minimum of two hours (Moscow to Lewiston round trip) to get testimony heard at the proposed hearing schedule. This is true of many of the other highly recreation-dependent communities within Idaho. In addition, this schedule of hearings will eliminate testimony from large populations of wildland-recreation users, who just happen to live in, for example, Spokane, Washington. There are several other cities on the wrong side of the State of Idaho's borderline, that have no say in this short-sighted process, even though they fully share the rights of ownership of this Federal land with the people who happen to live in the resource extractive towns and cities chosen to benefit from this EIS. (Preservation/Conservation, Lenore, ID - #6543.7.12120.061)

To be considered a fair, democratic process, the hearings for this EIS must include hearing dates for the cities of Moscow and Sandpoint, Idaho (I'm speaking only for northern Idaho, there may be other cities in southern Idaho that should be allowed to testify on this issue). This could be accomplished with no additional expense by eliminating either the Grangeville or Orofino hearing from the schedule.

In addition, the people living in Spokane, Washington, La Grande, Oregon, Ontario, Oregon, Salt Lake City, Utah, Jackson Hole, Wyoming, Hamilton, Montana, and Missoula, Montana are all stakeholders in this decision and need to be allowed an opportunity to testify in the formal hearings.

This EIS process needs to schedule hearings for these stakeholders. (Preservation/Conservation, Lenore, ID - #6543.8.12120.110)

BECAUSE THERE HAS BEEN INSUFFICIENT OPPORTUNITY FOR NON-IDAHO CITIZENS TO MEET ON AND DISCUSS THIS PROPOSAL

On January 14, 2008, the U.S. Forest Service will be holding a public meeting in Washington, DC, to discuss a new Rule that would weaken protections for National Forest Roadless Areas in the State of Idaho. This will be the only opportunity for citizens outside Idaho to speak out and demand protection for these irreplaceable public lands; lands that belong to all Americans. (Individual, Wheaton, IL - #51.1.12120.063)

Public Comments

1-58 Public Concern: The Forest Service should show flexibility, when possible, with allotted time for public comment at meetings.

BECAUSE ISSUES AND INFORMATION RELATED TO PROPOSED RULES ARE VOLUMINOUS AND COMPLEX, AND INFORMED PUBLIC INPUT SHOULD BE INVITED

Last night, I attended one of the public meetings in Grangeville, Idaho to hear the USFS presentation by Brad Gilbert, and was allowed my 3 minutes of oral comments. I had been at two other hearings in Washington DC, earlier, where we were also only given 3 minutes to comment. At the Grangeville meeting, I had signed my wife up to speak, hoping she might make the meeting when she got off work. The lady at the check in table said this was ok, and when I asked if I could run over into my wife's allowed time, if need be, she said yes. I mentioned this to Brad at the beginning of my presentation, then proceeded to talk. But, I was asked to wrap up, after my 3 minutes, anyway, which disrupted my presentation. It was only about 25 seconds longer, but then became fragmented and watered down the effectiveness of my conclusion. There were only 5 speakers that night, not 25, 30, or 50, and I expressed my concerns about this to Brad afterwards. Yes, I understand time is a premium (everyone in America is always in a hurry), everyone deserves a chance to speak, etc. but how about some judgment (factor) when sign-ups are shorter for allowances for some drift-over time. As I drove through a blizzard night homeward, I thought more about this. Here I had spent weeks pouring over the plans/documents, reams of info, etc, and hours of writing, trying to reduce comments to 3 minutes. All for a matter that is so

complicated and document heavy, that the USFS can't even simplify into simpler language and wordage. Yet they solicit for public comments, then expect to get valuable feedback in just 3 minutes. How genuine is this? I know a lot of people who never go or participate in public comment periods. The reason: they do not trust that anyone is really listening. They believe it all to be for show, going through the motion the USFS is required by law to do, with comments just appended away for proof the public was allowed to speak. Unless you are a professional writer/speaker, who can say a lot in few words, it is an unrealistic expectation to get meaningful dialogue (other than are you for or against a plan) in only 3 minutes for issues that required reams of information to explain. So what if a public meeting lasts until midnight? There should be more flexibility with the time allowed for people to speak. Sure folks will need a hook for rambling aimlessly, or if things begin to get too nasty, or off issue, but otherwise, why restrict civilized discourse so harshly? It is really frustrating to fly thousands of miles, drive icy winter roads, spend countless hours studying the issues, then get just 3 minutes of token comments. This is why people are tired of politicians and federal bureaucracies. They only pretend to listen to the people, and only for a very short time. They are the professionals. They think they already know what is best for the people. When you look at the polls that show tremendous public support for more Roadless Areas, then get an administration (as in Bush) that has two deaf ears, two blind eyes, and continues to undermine the "public will," why participate? Aside from law, why even hold these public meetings? Even though, (30 years ago) I worked for the USFS as a wildlife habitat biologist, and understand the issues, complications, and input values, it appears that the public perception of being seriously considered is sliding ever more downhill. Very frustrating, (I may have to join my friends who tell me I am wasting my time). (Individual, #215.1-2.12120.720)

1-59 Public Concern: The Forest Service should address the inadequacy of the public involvement process for the Idaho Roadless Rule.

Your consideration of public comments was inadequate, abrupt, and self-serving. Your dismissal of additional efforts to protect Roadless Areas and create stronger accountability in the GFRG [General Forest, Rangeland, and Grassland management theme] was particularly self-indulgent. (Recreation/Conservation Organization, Boise, ID - #1723.29.10430.720)

The U.S. Forest Service and the State of Idaho have conducted a sham process that ignores the will of the public. (Recreation/Conservation Organization, Boise, ID - #1723.75.10440.060)

BECAUSE THE DISTRIBUTION OF COUNTY-SPECIFIC COMMENT FORMS WAS INADEQUATE AND NOT ALL COMMENTS WERE CONSIDERED

The Idaho Conservation League website was the only source for [the] county-specific comment forms that some counties required. At least one county entirely failed to consider written comments submitted in response to their request for comments. (Preservation/Conservation, Boise, ID - #4156.1.12000.030)

BECAUSE THE COMMENT FORMS WERE MISLEADING AND BIASED

The comment forms and other information were misleading, biased, and developed to obtain pre-determined outcomes. (Individual, Potlatch, ID - #7994.18.12000.720)

BECAUSE COMMENTS FROM OTHER STATES WERE NOT CONSIDERED AND SOME COUNTIES WERE ALLOWED MORE INPUT THAN OTHERS

The development of the State of Idaho petition has been a far cry from a public process. First of all, comments from citizens from other States were generally not considered in the analysis. Second, even Idaho citizen comments were filtered through county commissioners, and some counties were given much more input than others in the process. (Recreation/Conservation Organization, Boise, ID - #1818.7.10430.720)

BECAUSE LOCAL AND STATE GOVERNMENT ENTITIES WERE INAPPROPRIATELY PLACED IN CHARGE

The public involvement associated with the Idaho State petition was underwhelming, biased and ludicrous. Having the County Commissioners, the Governor's Office, and the Governor's Office of Species conservation conduct the process was equivalent to having the oil companies write the National

Energy Bill. The State Petition Rule is a manifest example of political cronyism and circumvention of the democratic process. (Recreation/Conservation Organization, Boise, ID - #1723.21.12000.720)

BECAUSE THE BOUNDARY COUNTY COMMISSIONERS DID A POOR JOB OF SOLICITING PUBLIC INPUT

Our Boundary County commissioners, responsible for influencing the fate of our wildlands in the most recent Roadless Plan, did a poor job of soliciting public input. Their recommendations reflect a strong bias in favor of resource extraction, not the reality of the present economy. (Individual, Naples, ID - #6548.4.10430.800)

1-60 Public Concern: The Forest Service should reconsider the input of Adams, Valley, and Idaho Counties.

BECAUSE THEIR RECOMMENDATIONS WERE IGNORED

The counties recommendations made to the Office of the Governor should be brought back into this process. They were largely ignored by Governor Risch. Adams, Valley, and Idaho Counties recommended that large portions of the IRAs [Inventoried Roadless Areas] be managed under 5.2 – Commodity Production Emphasis within Forested Landscapes. (Multiple use or lands rights organization, McCall, ID - #1811.6.10430.800)

1-61 Public Concern: The Forest Service should revisit the comments received on the Idaho Roadless Rule.

BECAUSE THE COMMENT ANALYSIS DID NOT REFLECT THE VIEW OF THE MAJORITY

The comment analysis did not accurately represent the comments of Idahoans. The comments of citizens who favored protection of Roadless Areas and wanted all citizens involved in public land decisions were ignored. This occurred in spite of the fact that over much of the State, those comments were in the vast majority. In several instances, county recommendations ran against those of overwhelming citizen support for protection. (Individual, Potlatch, ID - #7994.19.10430.061)

1-62 Public Concern: The Forest Service should correctly describe the concerns raised by the public.

On page 1142, the preamble states, “Local resource concerns include ensuring access, protecting communities, property and resources from risk of wildfire; as well as protecting forests from the adverse effects of wildfire, insects and disease.” This is misrepresentative of local concerns. As a result of public meetings comment and input from Idahoans and other locals (i.e., Montanans, Utahans, Oregonians and Washingtonians who live in proximity to Idaho Roadless Areas), concerns with the impact of the proposed Rule on wildlife, water quality, recreation, aesthetics, conservation and numerous other issues have been voiced. The omission of these concerns from the discussion is significant and should be corrected. (Preservation/Conservation, Boise, ID - #4156.11.21000.061)

1-63 Public Concern: The Forest Service should correct references to the public input on the Idaho Panhandle National Forest Management Plan.

TO ACKNOWLEDGE THE LACK OF COMMENT RECEIVED ON THE GENERAL FOREST DESIGNATION

Some references to assignments to [the] General Forest on the Idaho Panhandle National Forest (IPNF) were purportedly “based on public input to the revised forest plan.” In response, the Idaho Conservation League conducted a review of the "Analysis of Public Comment" for the proposed IPNF Forest Plan. No reference to any of the General Forest-designated Roadless Areas illustrated any public input that supported such a designation. Other designations were based on “WUI [Wildland-Urban Interface].” However the designation of WUI as General Forest does not meet the need identified by the State petition, or statements of Lt. Governor Risch. (Preservation/Conservation, Boise, ID - #4156.159.20000.600)

1-64 Public Concern: The Forest Service should not treat public comments as votes.**TO COMPLY WITH THE SPIRIT OF NEPA**

We [Capital Trail Vehicle Association] are concerned with the way that comments are being used by agencies in the decision-making process. Agency management has said that the total number of comments received during the process is considered during the decision-making. There is a clear indication that decisions are being made based on those interests producing the most comments. We strongly disagree with a decision-making process using comments as a voting process, where the most comments wins the most trails and recreation opportunities because motorized recreationists and working class citizens have a low participation rate in NEPA processes. The intent of [the] National Environmental Policy Act (NEPA) when seeking comments during scoping and document comment processes is to solicit input in order to assure that significant issues were brought forward and considered. This intent is stated in NEPA Section 1501.7 as “There shall be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action.” And in NEPA Section 1503.1 as “(4) Request comments from the public, affirmatively soliciting comments from those persons or organizations who may be interested or affected.”

Clearly, comments under NEPA were intended to bring issues and concerns to the attention of the team preparing the environmental document and the decision-makers. NEPA did not suggest that comments were to be used as a voting process to indicate support of alternatives. Nor did NEPA anticipate that the scoping and citizen input would be dominated by well-funded special interest groups. And finally, NEPA did not intend citizens to comment on every possible NEPA [process] as a requirement to protect their interests, needs, and quality of life. (Motorized Recreation, Helena, MT - #168.280.10430.131)

1-65 Public Concern: The Forest Service should take seriously the concerns of those who value conservation and preservation.**TO ENSURE THAT THE PROCESS IS FAIR AND OBJECTIVE**

Both the Forest Planning Process and this Idaho Roadless Rule are characterized by token consideration for those that value wilderness and roadless area conservation and preservation, whereas the allocation for development of the Roadless Areas (timber harvest, roading, and mining) totaled some 80.7 percent of the 9.3+ million acres. This can hardly be construed as a fair and objective process. Your continuum of management themes can best be described as flowing from nothing new to a blatant public subsidy to Idaho’s extractive industries. (Individual, #268.8.10400.57)

1-66 Public Concern: The Forest Service should seek out motorized recreationists to solicit comment.

Why use so many indirect attempts such as public meetings and open houses to gather feedback from motorized recreationists? Why not just go directly to motorized recreationists in the field and at club meetings and ask them? NEPA encourages direct coordination with the impacted public instead of a process tailor made for special-interest environmental groups. (Motorized Recreation, Helena, MT - #168.200.12500.131)

1-67 Public Concern: The Forest Service should solicit public comment on all alternatives.**BECAUSE NOT EVERYONE HAS ACCESS OR A WAY OF KNOWING WHAT IS IN THE FEDERAL REGISTER**

To ask for public comment after the alternative has pretty much been set in motion for finalization seems to be a “wash.” Not all have access or were informed [as] to what is in the Federal Register pertaining to [the] EIS, commenting, or the resulting decisions in Summaries of Public Comments. (Individual, Challis, ID - #313.5.12000.720)

1-68 Public Concern: The Forest Service should ensure that all public comments are carefully considered.

BECAUSE PUBLIC COMMENT HAS NOT ALWAYS BEEN TREATED APPROPRIATELY

After the meeting I asked one of the Idaho County Commissioners (whose name will remain undisclosed for now) how they handled the comments they received from the public and how those comments were used to formulate a recommendation to the Governor representing the feelings of the county residents. His first words were barked at me in a raised voice: "It wasn't a vote!" He then went on to explain to me how the Commissioners threw out the public comments that were submitted in post-card format in spite of the fact that each postcard had a unique name and signature. I then told him: "I'll bet most of those postcards were from people who favored the Clinton/Dombeck Roadless Rule. He said "yes." The October 29, 2006, issue of the Spokesman Review newspaper highlighted the "laughable process used by Risch to obtain public information on the state's roadless lands, which was transparently weighted to favor rural interests." It was then I knew that the outcome of the countywide public comment process in Idaho was known before the public even commented. (Individual, #338.15.10430.720)

I attended an unofficial hearing in Boise on Feb[ruary] 28, 2008. Attached you will find the comments I made verbally. I was very discouraged that this was not an official hearing. Why did they even bother since no one took notes? They basically wasted everyone's time. (Individual, #331.1.12120.720)

BECAUSE CITIZENS OF THIS GREAT NATION ARE FEELING IGNORED OR MISREPRESENTED

My view of this administration and its various agendas make me heartbroken. I have never felt more overlooked, trivialized, misrepresented, and ignored as a common citizen of this great nation. (Individual, Dallas, TX - #1278.3.10430.021)

On January 10, 2008, I received a "Dear Interested Party" email from Elaine Waterbury (with your [Mr. Dillard] signature at the bottom) announcing the availability of the DEIS for the so-called "Idaho Roadless Rule." Your 1/10 note invited the public to comment on the DEIS. I wondered at that time how many million times must the US Forest Service big shots be told "No," "hell no" before they will listen to the owners of the land you are paid to administer. When we pay taxes and Congress appropriates that money to pay your salaries that makes the American public collectively your boss. Isn't it customary to obey your boss's reasonable requests? (Individual, Grangeville, ID - #338.3.10430.023)

BECAUSE ALL CITIZENS ARE PART OWNERS OF PUBLIC LANDS

Like all Americans, I am part owner of public lands. As part owner, my say should be heard. I understand the need for mining and logging industries, but total destruction of the environment shouldn't be tolerated. To allow the opening of new mines while the toxic waste and runoff of operating and abandoned mines has yet to be cleaned is just wrong. Period. (Individual, #802.1.10430.200)

BECAUSE THE STATE OF IDAHO MADE LITTLE EFFORT TO INCLUDE TRIBAL VALUES IN THE PUBLIC COMMENT PROCESS

The State of Idaho, not having the trust obligations of the Federal government, made little effort to include Tribal values in their public comment process. The Forest Service's process in developing the DEIS did not correct this breach of their trust responsibility to the tribe [the Coeur d'Alene Tribe]. (Tribal Government/Elected Official/agency, Plummer, ID - #1696.9.10300.020)

BECAUSE COUNTY COMMISSIONERS DID NOT HANDLE COMMENTS APPROPRIATELY

In Latah County, where there was overwhelming support for retaining the 2001 Clinton Rule, IRU [Idaho Rivers United] members supplied comments to that effect. However, when Latah County commissioners forwarded their comments to the State of Idaho, they ignored most of the citizen comments and deferred to other neighboring counties for substantive comments. Their reasoning was that Latah County contained no Roadless Areas, and therefore they did not think that they should be making decisions for their neighbors who lived in counties dominated by Roadless Areas. With all due respect, county commissioners in Idaho are not the gatekeepers of America's public lands. (Recreation/Conservation Organization, Boise, ID - #1818.8.10430.030)

**BECAUSE CITIZENS KEEP HAVING TO SAY THE SAME THING: PRESERVE
OUR PRISTINE PUBLIC LANDS**

It is my understanding [that] once again the Forest Service is seeking comment on the use of Roadless Areas in Idaho. It remains frustrating to me as a citizen and frequent user of the forests in Idaho, Washington and Montana that there is an incessant effort at revisiting what the public has already made clear: we need and want Roadless Areas. (Individual, #195.1.10430.127)

My frustration at being once again forced to respond stems mostly from having to comment on the obvious. If Roadless Areas are opened to logging, development, quads, road building, or whatever buzzword of the day reopens the discussion, then those areas are gone forever for our collective enjoyment. It is painful to watch the continual iterative process where each go around finds the Forest Service asking for compromise to cut yet more of the pristine public lands while giving nothing back to the public for the unspoiled use by the next generation. This is unacceptable. (Individual, #195.2.10430.200)

**TO AVOID THE PERCEPTION THAT COMMENT IS REPEATEDLY SOLICITED IN ORDER
TO WEAR DOWN THOSE WHO CARE ENOUGH TO COMMENT**

I have a legitimate angst that the purpose of this continued effort at public comment is nothing more than a hidden effort to wear down those that actually comment while awaiting a time when we are tired and do not respond. I fear I will then see published Forest Service comments that the public does not care or does not mind the reduction of Roadless Areas. I hope I am wrong, but in case my fear is well founded, please record that I care and I am a permanent objector to any effort now or in the future to invade Roadless Areas. (Individual, #195.5.10430.720)

BECAUSE A PLANNED PROCESS FAILURE IN IDAHO WAS INTENDED TO FAVOR THE MINORITY OPINION

The Governor petition process in Idaho was rigged to arrive at a predetermined outcome regardless of the public comments submitted to county commissioners: There was a well-planned process failure between the time citizens submitted comments to their county commissioners, the county commissioners “evaluated” the comments,” and the county summaries were sent to Lt. Governor Risch. This is precisely why Lt. Governor Risch’s Petition to the Bush administration favors the minority [viewpoint] in the Moore Information, Inc. telephone survey. (Individual, #338.12.12000.720)

**1-69 Public Concern: The Forest Service should correct the statements made by
Lt. Governor Risch.**

BECAUSE THEY WERE INACCURATE

As a retired Forest Service employee who worked 11 years as a forest planner, I know Roadless Area policy. I sat through a videotape of Lt. Gov. Jim Risch telling Idahoans lies about his tragic plans for inventoried Roadless Areas on National Forests located in Idaho. In at least three instances, I wanted to yell out “Stop the video, that’s not true.” These were the times when Lt. Gov. Risch said Idaho’s Roadless Areas would be better protected under the Governor petition process. How convenient that Lt. Gov. Risch chose to circumscribe J. R. Simplot’s planned phosphate mining locations with an “anything goes” Roadless category. (Individual, #338.14.20000.720)

The “Bad” News must be sent to the Top Mr. Gilbert, your job demands two-way communication. There were 16 public hearings across the state of Idaho. I attended the one held in Grangeville. At all 16 hearings, Idaho’s Lt. Governor Jim Risch explained the proposed Rule in a video presentation. Clearly, Lt. Governor Jim Risch’s speech was well scripted by the Forest Service because he made the following untrue statements: “This is an Idaho plan, put together by us, for us. This is something Idahoans should get behind.” My Roadless plan “gives the highest level of protection for this land” and will protect these lands for years to come. (Individual, #338.21.12120.720)

I want to talk about Lieutenant Governor Risch’s video first. He said a few things that were misleading. I don’t think he did it on purpose, but the fact is they were misleading, so I’m going to point them out. [The] RACNAC [Roadless Area Conservation National Advisory Committee] committee did not

unanimously embrace this Rule. They met again today, and they still haven't come to an agreement on it. That's misleading. (Preservation/Conservation, Boise, ID - #9182.1.17000.720)

1-70 Public Concern: The Forest Service should ensure that the public participation process does not obscure the needs of citizens.

TO ENSURE THAT RECREATIONAL OPPORTUNITIES ARE BASED ON PUBLIC NEED

The establishment of recreational opportunities on public lands should be based on public need. Other government entities are directed to address and meet the needs of the public. For example, cities provide water and sewer systems based on public need. Highways are constructed based on public need. The need for these facilities is not based on the level of citizen involvement. The need for these facilities is based on an assessment of need developed by water and sewer usage, traffic counts, etc. The public has a basic expectation that agencies will look out for all of their interests and the best interests of the public are met when agencies respond to the needs of the public in this manner. If members of the public did not comment on the upgrade of a water treatment plant or the construction of a highway [it] does not mean that their water is shut off or that they can't drive to Bozeman. We [Capital Trail Vehicle Association] request that the use of public participation in decision-making for this proposed action be monitored to assure that it does not obscure the needs of all citizens who rely on the project area for their recreation and livelihoods. (Motorized Recreation, Helena, MT - #168.286.10430.060)

Agency Involvement

1-71 Public Concern: The Forest Service should improve coordination between National Forest and BLM lands.

TO MAINTAIN MOTORIZED RECREATION OPPORTUNITIES

There needs to be better coordination between adjoining National Forest and BLM [U.S. Bureau of Land Management] lands when making maps, laying out trails, and establishing travel plans. In some cases, a trail is open in one jurisdiction but becomes closed when it crosses over the boundary to another jurisdiction, resulting in an overall loss of motorized recreation opportunity. (Motorized Recreation, Helena, MT - #168.384.10200.530)

1-72 Public Concern: The Forest Service should delay formal consultation with consulting agencies until a final Agency action has been submitted.

Consulting agencies are required to consult on final Agency actions. Because the proposed Idaho Rule is still in a state of flux, consultation should be delayed until a final, or near final, Agency action is identified and submitted. (Preservation/Conservation, Boise, ID - #4156.114.10200.100)

1-73 Public Concern: The Forest Service should not delay formal consultation and analysis.

BECAUSE RULES OF THIS SORT DO AFFECT THE ENVIRONMENT

Time and again, Federal courts have invalidated arguments that regulations, rules and plans do not directly affect the environment. Most recently, the 2005 Planning Regulations and the State Petitions Roadless Rule suffered such fates. The proposed Idaho Roadless Rule would remove existing protections and would affect the human and natural environment. As they have done in other instances, the Forest Service is delaying formal consultation and analysis until more concrete development plans are proposed. This is inappropriate. (Preservation/Conservation, Boise, ID - #4156.115.10200.720)

1-74 Public Concern: The Forest Service should engage in formal consultation with the U.S. Fish and Wildlife Service and National Marine Fisheries Service at the time a final action is selected.

TO COMPLY WITH THE LAW AND PREVIOUS COURT RULINGS

Perhaps the most significant deficiency in the BA/BE [Biological Assessment/Biological Evaluation] Report is the assertion that formal consultation with the U.S. Fish and Wildlife Service [USFWS] and NOAA Fisheries [National Marine Fisheries Service] is not necessary. The Forest Service claims that because “there are no on-the-ground actions linked to this decision and therefore no direct effects would result from this decision . . .” formal consultation is not required on this programmatic-level planning document (BA/BE Report, p. 3). However, this fallacy was the very reason the Bush administration’s State Petitions Roadless Rule and revised NFMA [National Forest Management Act] Implementing Regulations were enjoined in Federal court. In fact, the management themes in the draft Idaho Rule prescribe or permit specific actions for specific purposes. As courts have consistently found, rules and regulations directly affect the environment when they repeal or amend protections. This has direct on-the-ground impacts, upon which consultations must occur. Further, extensive consultation and analysis went into the development of Forest Plan prescriptions, standards and guidelines that differ substantially from management direction proposed in the draft Idaho Rule. Therefore, the Forest Service must engage in formal consultation with USFWS and NOAA Fisheries at the time that a final action is selected. (Preservation/Conservation, Boise, ID - #4156.83.10200.160)

BECAUSE THE AGENCY HAS NOT COMPLIED WITH THE ENDANGERED SPECIES ACT

The Specialist Report, Biological Evaluation, and Biological Assessment for Aquatic and Terrestrial Habitats and Species (BA/BE Report) as well as the TECS Plants Specialist Report determine that the proposed Idaho Roadless Rule would be not likely to adversely affect species because the proposed Idaho Rule “does not directly authorize any ground-disturbing activities.” The DEIS states that informal consultation is occurring with regards to this proposal. The BA/BE Report maintains that the U.S. Fish and Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration-Fisheries (NOAA [Fisheries]) were “extensively involved in the development and evaluation of alternatives.” The BA/BE Report also claims that this “consultation” meets the requirements of ESA [Endangered Species Act] Section 7. These determinations and findings stand in direct conflict to the ESA. (Preservation/Conservation, Boise, ID - #4156.110.10200.135)

1-75 Public Concern: The Forest Service should consult with State agency and geothermal industry representatives.

TO ENSURE THAT GEOTHERMAL EXPLORATION AND DEVELOPMENT OPPORTUNITIES ARE NOT EXCESSIVELY RESTRICTED BY THE FINAL RULE

Geothermal exploration and development is a particular example of a renewable energy resource activity that is restricted as a leasable mineral-type resource in the Proposed Rule. This resource is potentially widespread within many Idaho counties, and often requires expensive deep drilling exploration supported by temporary roads to explore and delineate prior to making a decision regarding development. The Forest Service should consult with knowledgeable State agency and geothermal industry representatives to assure that geothermal exploration and development opportunities are not excessively restricted in the Final Rule. (Regional/other governmental agency (multi-jurisdictional), Boise, ID - #6545.8.10200.424)

1-76 Public Concern: The Forest Service should consult with State agency and mining/energy representatives.

TO ENSURE THAT THE FINAL RULE WILL NOT UNREASONABLY RESTRICT OR CONFUSE MINERAL EXPLORATION

Mineral exploration and development. The Proposed Rule does not appear to affect hard-rock locatable (Mining Law of 1872) mineral rights and activities, but does contain restrictions on phosphate and other leasable and saleable minerals in Roadless Areas. The Forest Service should consult with knowledgeable

State agency and mining/energy industry representatives and assure that the Final Rule does not unreasonably restrict or confuse leasable and saleable as well as locatable mineral exploration and development. (Regional/other governmental agency (multi-jurisdictional), Boise, ID - #6545.6.10200.400)

1-77 Public Concern: The Forest Service should consult with the Roadless Area Conservation National Advisory Committee and the three lead Idaho county commissioners on the definitions of “significant risk” and “stewardship” projects.

Roadless Area Conservation National Advisory Committee (RACNAC) and Lead County Commissioner assistance for the Final Rule. The Forest Service should consult with the RACNAC and the three lead Idaho county commissioners designated as liaison for this rulemaking, to consider their recommendations for clarifying definitions of “significant risk” and “stewardship” projects for purposes of activities to be permissible in Backcountry/Restoration category areas, and other refinements for the Final Rule. These refinements should remain true to the Idaho petition and concerns expressed in these and prior county commissioner comments and recommendations. (Regional/other governmental agency (multi-jurisdictional), Boise, ID - #6545.13.10200.260)

Chapter 2: Proposed Idaho Roadless Rule

General Support for and Opposition to the Proposed Idaho Roadless Rule

Support for the Idaho Roadless Rule: Purpose and Need Concerns

2-1 Public Concern: The Forest Service should adopt the Idaho Roadless Rule.

We [Associated Logging Contractors] are certain that Idaho's petition for Roadless Area management will provide a better way to manage our Idaho forests. (Organization, #1699.2.20000.1)

The Idaho Chapters of the Society of American Foresters (SAF) support the Proposed Action of the USDA [U.S. Department of Agriculture] Forest Service to adopt the Idaho Roadless Rule as petitioned by the State of Idaho for the management direction of 9.3 million acres of Inventoried Roadless Areas on National Forest System lands in Idaho. (Organization, #1802.1.20000.1)

I support the State of Idaho petition regarding Roadless Areas in Idaho. (Individual, Pocatello, ID - #9168.1.20000.001)

BECAUSE THE IDAHO ROADLESS RULE SHOULD REDUCE LITIGATION

I support the State of Idaho Plan for Inventoried Roadless Areas in Idaho State. It is logical to classify various area[s] based on their current condition, historical use and in harmony with current federal law. I hope that such designations would reduce the endless litigation associated with every mining claim development, timber sale, road built, or campground proposed. (Individual, #1191.1.20000.600)

BECAUSE THE IDAHO ROADLESS RULE WILL PROVIDE BETTER FOREST HEALTH MANAGEMENT

We [Associated Logging Contractors] support appropriate management activities for Idaho's Inventoried Roadless Areas. Idaho has one of the largest number of forest acres to manage in the United States, with large areas of forest lands owned by various Federal and State agencies, as well as private owners. The management of these forests must be well coordinated, with an emphasis on addressing specific forest health problems at the local level, as each National Forest interfaces with State and private holdings. There is no doubt that Idaho's National Forests suffer from significant diseases associated with overstocking of diseased and dying trees, which naturally carries over to state and private lands. The proposed Idaho Roadless Rule, at a minimum, allows for a diverse management approach based upon specific management themes, as identified at the local level in a public process. The proposed Idaho Roadless Rule allows for temporary roads and timber harvesting in areas at high risk for wildfire, insect outbreaks and disease, [and] other natural disasters, especially where local communities and private land holdings are also threatened. (Organization, #1699.4.20000.260)

TO ELIMINATE LEGAL UNCERTAINTIES THAT HAVE PARALYZED FOREST SERVICE DECISION MAKING

The Proposed Rule addresses a number of legal issues associated with the 2001 Roadless Area Conservation Rule. The proposed management of Inventoried Roadless Areas (IRAs) has been the subject of decades of intense public debate. Since the 2001 implementation of the RACR [2001 Roadless Area Conservation Rule], which with some exceptions, prohibited road building in IRAs, the Rule has been challenged in nine lawsuits in federal courts in Idaho, Utah, North Dakota, Wyoming, Alaska, and the District of Columbia. Because of the legal uncertainty regarding the fate of the RACR, the USFS has been paralyzed in making land management decisions or recommendations related to areas in or around IRAs [Footnote 2: For example, the J. R. Simplot Company has had a lease modification application pending with BLM for over five years due to the USFS's unwillingness to make a recommendation to the BLM regarding the discretionary BLM leasing decision]. This uncertainty needs to be resolved so

informed, site-specific management of Roadless Areas can be implemented, consistent with existing Forest Plans. I support the proposed Idaho Rule, because it helps to eliminate uncertainty regarding the legal status of the RACR in Idaho. (Individual, #1815.6.20000.140)

**BECAUSE THE IDAHO ROADLESS RULE ALLOWS FOR MULTIPLE USE
AND WAS SUBJECT TO SIGNIFICANT PUBLIC INVOLVEMENT**

We believe the adoption of this rule, which was developed by the State through an extensive public process, is consistent with requirements for adoption of sustainable forest management plans that appropriately provide for the multiple-use of National Forest lands. (Organization, #328.3.22000.800)

**BECAUSE THE IDAHO ROADLESS RULE ALLOWS FOR MANAGEMENT
FLEXIBILITY AT THE LOCAL LEVEL**

The Idaho Roadless Rule specifically addresses the following: This rule recognizes that a “one-size fits all” approach to Inventoried Roadless Areas is not a realistic or sustainable. The proposed Rule has as its foundation existing management plans for National Forests in Idaho. These plans, which have already been through an extensive public involvement process, provide individual management prescriptions for each Inventoried Roadless Area based on specific management issues and uses. Wildland fire is a growing problem on National Forests. The proposed Rule provides flexibility to address issues associated with forest health so as to reduce risks from wildfires. The rule protects the basic tenets of the Multiple-Use Sustained Act of 1960. For these reasons, the Northwest Food Processors Association urges approval of the proposed Rule. (Organization, #328.5.20000.100)

ALC [Associated Logging Contractors] supports the issuance of a Final Rule to implement a management plan for Inventoried Roadless Areas in Idaho that provides for local input and governance at the county level. (Organization, #1699.1.20000.61)

BECAUSE MANAGEMENT DECISIONS ARE BEST MADE AT THE LOCAL LEVEL

I would also like to say [that] the local forest and ranger district levels are probably the best scale for making management decisions about our forests. In general, I am very wary of Washington, D.C. decision making and shortsightedness by mining and other extractive interests. (Individual, #207.3.11000.57)

We support the proposed action referred to as the “Idaho Roadless Rule.” We want our state authorities with our input to make the decisions involving our Forest and Rangelands. We do not want people back east who don’t live here or who only own a “vacation” home making decisions that involve recreation areas and employment for our State. We are the people that live here every day of every year and this decision will affect our lives long term, so we need to have a say as to how these areas are managed. I want to state that I am in support of the proposed action referred to as the “Idaho Roadless Rule.” (Individual, #282.1.20000.123)

The proposed Roadless Area Conservation Rule for Idaho takes into consideration local input in managing National Forests. I believe that resource management plans, such as the management plan for Caribou National Forest, requires this local input from people most affected by the plans.

Decisions which affect anything from use of a mechanized vehicle on a forest trail, being able to drive into the forest for hunting and fishing opportunities, or access roads to phosphate ore or other resources can best be made locally where the impacts of the Rules are most felt. (Individual, Pocatello, ID - #9165.3.20000.123)

BECAUSE THE IDAHO ROADLESS RULE TAKES INTO ACCOUNT THE DESIRES OF IDAHOANS

We [Clark County Board of Commissioners] begin by saying that we unequivocally support the Idaho Roadless Rule over the Clinton Rule (2001 Rule). The Idaho Rule is so superior to the Clinton Rule there is no comparison. The Clinton Rule was a top-down, government-knows-best approach that did not consider the desires of Idahoans concerning how they want these Roadless Areas to be managed. (Government, #1576.1.20000.61)

**BECAUSE THE IDAHO ROADLESS RULE REPRESENTS THE INTERESTS
OF ALL STAKEHOLDERS**

This plan addresses the needs of all stakeholders, including backcountry enthusiasts. It does not and should not address the wants of backcountry worshippers. (Individual, #225.2.20000.50)

Support for the Idaho Roadless Rule: Legal Concerns

2-2 Public Concern: The Forest Service should adopt the Idaho Roadless Rule.

**BECAUSE THE IDAHO ROADLESS RULE IS CONSISTENT WITH
THE MULTIPLE-USE SUSTAINED-YIELD ACT OF 1960**

For decades, National Forests have been managed within federal law. [The] IRR [Idaho Roadless Rule] is consistent with sustainable forest management plans that provide multiple uses for the State of Idaho and is consistent with the following federal statute: The Multiple-Use Sustained-Yield Act of 1960 established the principle that National Forests are managed to meet multiple needs. (Organization, #1701.6.22116.130)

**BECAUSE THE IDAHO ROADLESS RULE IS CONSISTENT WITH THE FOREST
AND RANGELAND RENEWABLE RESOURCES PLANNING ACT**

The Forest and Rangeland Renewable Resources Planning Act of 1974 reinforced the concept of multiple use in management of the National Forests, providing that management prescriptions for the forests were to be developed after careful planning to determine most appropriate uses. The RACR [Roadless Area Conservation Act] did not provide for such planning and development of appropriate management prescriptions; however, the Proposed Idaho Rule does take into consideration these prescriptions. (Mining Industry/Association, Boise, ID - #1795.8.20000.130)

The RACR [Roadless Area Conservation Rule] did not provide an opportunity for the analysis of environmental and economic impacts, or coordination of multiple use and sustained yield opportunities. Thus the RACR was faulted for applying one set of standards uniformly to every Inventoried Roadless Area, for lacking the flexibility and exceptions for necessary resource management activities, and for prohibiting potential resource uses (timber, minerals, gas and oil). The Proposed Idaho Rule for Inventoried Roadless Area Management does evaluate Roadless Areas as originally envisioned in the 1974 legislation [the Forest and Rangeland Renewable Resources Planning Act of 1974], as a “comprehensive assessment of present and anticipated uses, demand for, and supply of renewable resources from the nation’s public and private forests and rangelands, through analysis of environmental and economic impacts, coordination of multiple uses and sustained yield activities.” The Proposed Rule includes a number of elements consistent with a comprehensive assessment: detailed description of areas; recommended management; the rationale of the management recommendations; [and] a description of how the recommended management compares with existing policies, directions, and resource management plans (such as existing National Forest Plans).

The Proposed Idaho Rule is based on looking at the needs associated with these lands (multiple use), to gather relevant information (analysis) and to provide recommendations (management plan). These steps are consistent with the letter and spirit of the 1960 [Multiple-Use Sustained-Yield Act of 1960] and [the] 1974 legislation. (Mining Industry/Association, Boise, ID - #1795.10.20000.130)

**BECAUSE THE IDAHO ROADLESS RULE IS CONSISTENT WITH THE MULTIPLE-USE
SUSTAINED-YIELD ACT OF 1960 AND THE FOREST AND RANGELAND
RENEWABLE RESOURCES PLANNING ACT**

The rule is consistent with federal statutes such as: The Multiple-Use Sustained-Yield Act of 1960, which established the principle that National Forests are to be managed to meet multiple needs. The Forest and Rangeland Renewable Resources Planning Act of 1974, which further reinforces the concept of multiple use in management of the National Forests, provides that management prescriptions for the forests were to be developed after careful planning to determine the most appropriate uses. The Forest

and Rangeland Renewable Resources Planning Act also specifically states that management of National Forests should be developed in cooperation with interested State and local agencies. (Organization, #328.4.22100.2)

For decades, National Forests have been managed within federal law. [The] IRR [Idaho Roadless Rule] is consistent with sustainable forest management plans that provide multiple uses for the State of Idaho and is consistent with the following federal statute: The Multiple-Use Sustained-Yield Act of 1960 established the principle that National Forests are managed to meet multiple needs. (Organization, #1701.6.22116.130)

BECAUSE THE IDAHO ROADLESS RULE IS CONSISTENT WITH THE WILDERNESS ACT

The Proposed Idaho Rule is consistent with the Wilderness Act, because it does not suffer from the same defect, creating de facto wilderness, which the Wyoming district court found in the RACR [Roadless Area Conservation Rule]. Simplot supports the Proposed Idaho Rule. (Mining Industry/Association, Boise, ID - #1795.12.20000.130)

BECAUSE THE IDAHO ROADLESS RULE IS CONSISTENT WITH FOREST PLANS AND OTHER FEDERAL REGULATIONS

The Proposed Rule is consistent with the Caribou-Targhee Revised Forest Plan (RFP) as well as other existing laws and plans. The proposed Rule is consistent with the established statutes governing management of National Forest, such as the Caribou-Targhee RFP and the Multiple-Use Sustained-Yield Act of 1960 (MUSYA). The RACR [2001 Roadless Area Conservation Rule], because of its “one size fits all” approach, by its own terms could not satisfy the multiple-use mandate of the MUSYA. The proposed Idaho Rule, with the analysis of each IRA [Inventoried Roadless Area], has provided the ability for a site-specific approach necessary to implement the multiple-use policy at an individual Forest Planning level, such as was done in regards to the Caribou-Targhee RFP. (Individual, #1815.7.20000.100)

BECAUSE THE IDAHO ROADLESS RULE ALLOWS FOR COORDINATION WITH NATIVE AMERICAN TRIBES

The Kootenai Tribe’s aboriginal territory encompasses parts of northern Idaho, western Montana, eastern Washington, and areas in Canada. Historically, the Kootenai Tribe relied on the many native fish and wildlife species within its aboriginal territory for cultural, subsistence, ceremonial and commercial purposes. Tribal identity has always depended in large part on caring for these resources consistent with its Covenant with the Creator-Spirit to guard and keep the land forever. The Kootenai Tribe possesses federally reserved hunting and fishing rights within its aboriginal territory, including the Idaho Panhandle National Forest. The federal government is obligated to protect and enhance the exercise of the Kootenai Tribe’s federally reserved rights in its management of the National Forests. The Proposed Rule represents a new method of conducting conservation and management of Inventoried Roadless Areas that recognize both national values and local situations. It allows the Kootenai Tribe, other Tribes, the State of Idaho, the United States government and affected local communities to collaborate and cooperate in accomplishing varied objectives. The recognition that those communities directly affected by National Forest management should have a say in such management is a giant step forward for the nation. (Government, #227.1.20000.40)

Support for the Idaho Roadless Rule: Natural Resource Concerns

2-3 Public Concern: The Forest Service should adopt the Idaho Roadless Rule.

BECAUSE THE IDAHO ROADLESS RULE ALLOWS FOR MINING

I support the Idaho Roadless Rule as it’s written. It’s good for the mining industry, and it gives the State of Idaho an opportunity to have different land uses. (Individual, Soda Springs, ID - #9186.1.20000.002)

BECAUSE THE IDAHO ROADLESS RULE ALLOWS FOR PHOSPHATE MINING

I support the Idaho Roadless Rule. There are limited areas in these United States that offer resources for phosphate extraction and this phosphate is so imperative to making foodstuffs more economical and available for not just [the] U.S. but the world through increased grower production. East Idaho has been blessed with this natural resource, and we are also fortunate to have mining companies that recognize its potential and to have the stewardship to bring these resources to life in an environmentally and safe practice. I support the Idaho Roadless Rule. (Individual, #808.4.20000.840)

BECAUSE IN PRACTICE THE 2001 RULE DID NOT ALLOW ACCESS TO MINERAL LEASE LANDS

The Proposed State Rule allows these rights [rights under the Due Process Clause and the Mineral Leasing Act] to be protected as a practical matter in a specific context, which has not been the experience under the confusion attendant to the RACR [Roadless Area Conservation Rule]. For example, since 2001, Simplot has had a lease modification application pending before the BLM to which it has an existing right under the Mineral Leasing Act regulations, but which has not been resolved due to the continuing reluctance by the Forest Service to take any action on special use permits related to lease modifications or exploration permits in Roadless Areas while the controversy surrounding the RACR continued, notwithstanding a specific exception in the RACR for outstanding rights. [Footnote 7: The Mineral Leasing Act regulations provide as follows: "If I already have a federal lease, or the mineral rights on adjacent private lands, may I lease adjoining Federal lands that contain the same deposits without competitive bidding?" Yes, if the adjoining federal lands are available for leasing, you may lease them non-competitively; even if they are known to contain a deposit of the mineral you are interested in leasing. We will either issue a new lease for these lands (fringe acreage) or add the lands to your existing Federal lease. See 43 CFR 3510.12. Simplot requested a modification to its Manning Creek Lease (1-27512) to add adjacent ground in December of 2001. BLM determined that the regulatory requirements were met in a Memorandum dated July 22, 2002, finding that the area requested was a logical extension of the Manning Creek lease and that "leasing the lands will conserve natural resources and will provide for economical and efficient recovery."] (Mining Industry/Association, Boise, ID - #1795.4.20000.130)

BECAUSE ALLOWING PHOSPHATE MINING WILL SUPPORT AGRICULTURE

NWFPA [Northwest Food Processor's Association] strongly supports the adoption of the proposed Rule. The Idaho Roadless Rule will significantly impact food processing and agricultural production in the Northwest by ensuring that there is access to phosphate ore in Inventoried Roadless Areas in the Caribou National Forest. (Organization, #328.1.20000.423)

I grew up in Moreland, Idaho where a lot of the residents out there are farmers. Farmers depend on their crops. Their crops depend on fertilizer. Fertilizer depends on the phosphate ore that is available in these areas. The petition needs to be passed so companies like Simplot can have access to these areas. Simplot is not the bad guy in this situation. In my time that I have been with the company I have seen the great things that Simplot does for the grounds that they mine on. They take very good care of the land and want to provide a great environment for the wildlife of Idaho. (Individual, #1203.1.20000.423)

BECAUSE EXTRACTIVE USES PROVIDE NEEDED ECONOMIC OPPORTUNITIES

As a land of many uses, our forests offer economic gain to the communities surrounding them. I reside in Southeastern Idaho where phosphate mining, agriculture and timber harvesting are among the dominant industries. They are vital to the economic sustainability of this area. Jobs are created. Families are raised. Communities grow. All are tied to our National Forest. Cattle are grazed on our forest floors and trees are harvested helping to reduce wild fires. Phosphate is extracted, land is reclaimed and offered as lush habitat for wildlife. In my opinion, we have created a kind of cycle of life that is responsible and concerned for the well-being of our forest. Each industry has made tremendous strides in reducing its environmental footprint and should be applauded for it. Much of the criticism that these industries endure is so unjustified. It is imperative that these industries continue. (Individual, Montpelier, ID - #326.6.11100.800)

**BECAUSE THE NATIONAL FORESTS ARE A RENEWABLE RESOURCE
THAT SHOULD BE USED TO THE FULLEST**

The most amazing thing I find about all this is the forest is one of our nation's largest resources, and it is a renewable resource! Why not use it to its full potential and manage it responsibly. Responsible management does not mean stay out; it is a method that allows every user, no matter how they recreate or make a living, the opportunity to do so, peacefully and respectfully. (Individual, #232.6.11100.60)

**BECAUSE IF WE DO NOT ALLOW INDUSTRY ACCESS TO OUR NATIONAL
FORESTS, THEY WILL GO TO OTHER NATIONS**

When President Clinton instated the Roadless Rule in 2001, I applauded the action. Seventeen years later, a broader perspective has changed my stance on this issue. One of U.S.'s greatest assets is its natural resources, renewable and non-renewable. Also, the U.S. has much more stringent environmental laws than most other countries we import timber and minerals from. Therefore, a compromise would be to thoroughly and consistently monitor environmental impacts that the timber and especially mining industry is having on the local environment, but allow companies to access the National Forest Land. It is ironic that some of the most ardent environmentalists seem to miss the fact that if the U.S. government makes it impossible for companies to access America's natural resources, guess what, the companies have to go somewhere else. (Individual, #1078.1.11100.200)

Support for the Idaho Roadless Rule: Other Concerns

2-4 Public Concern: The Forest Service should adopt the Idaho Roadless Rule.

**BECAUSE THE IDAHO ROADLESS RULE SUPPORTS THE PHOSPHATE
INDUSTRY, WHICH IN TURN SUPPORTS THE UNITED WAY**

I support the proposed action referred to as the Idaho Roadless Rule. The phosphate companies and their employees are huge contributors to the United Way of southeast Idaho. By the special interest groups trying to shut down mining in Idaho, they could very well cost the 39 agencies, United Way supporters, several thousand dollars per year. The J. R. Simplot Company and its employees alone pledged over \$57,000 to United Way in southeast Idaho in 2008. This is eight percent of our total contributions. The other phosphate producers are also huge supporters of our agencies in the overall United Way. (Town/City Government Agency/Elected Official/Association, Chubbuck, ID - #9151.1.20000.057)

TO PROVIDE FOR FUTURE SKI AREA EXPANSION

The Recreational Special Uses section from the Recreation Specialist Report from the DEIS is clear that decisions regarding existing and future special use permits would be project-specific and require compliance with all environmental regulations. Activities undertaken pursuant to existing permits would be unaffected by this programmatic action. Processing and administering special use permits would continue to be governed by Forest Plans. Proposed recreation developments such as expansion of ski areas in IRAs [Inventoried Roadless Areas] would be allowed if special use permits are in existence prior to adoption of this Rule and as long as the expansion is inside boundaries established by special use authorization.

This is where the difficulty lies: Brundage Mountain's current Master Plan and Master Plans of the past have always included expansion into areas north, south, east, and west of the resort. The Payette National Forest has always required a long-range Master Development Plan from Brundage, from that plan they require us to do [a] NEPA [analysis] on only a three- to five-year implementation plan.

The only parts of the Master Development Plan that is approved and governed by the special use permit are those that are already existing or are approved for implementation. Given [that] this is the required direction from our land managers, our phase two expansion is just as valid or invalid as the long-range plans that include the areas north of the resort. The 'Designated Roadless' Areas in question are to the north and east of the resort and are included in our Master Plan. (see attached pages [ATT 1])

The complex and expensive approval process associated with developing new ski areas on public land will ensure future skiing opportunities will occur through the expansion of existing ski facilities. In our case, planned ski area expansion will encounter Roadless Areas and without the proposed Rule change [they] will be restricted. (Special Use permittee, McCall, ID - #1820.5.20000.520)

Opposition to the Idaho Roadless Rule: Process Concerns

2-5 Public Concern: The Forest Service should not proceed with the proposed Idaho Roadless Rule.

The Tribe is a federally-recognized sovereign ~with Treaty-reserved rights in the National Forest System (NFS) lands that stand to be affected by the proposed Rule. Based on a thorough review of the proposed Rule, the DEIS, and staff-to-staff meetings between Tribal, Forest Service, and State of Idaho personnel, the Tribe has determined that it must remain unsupportive of the proposed Rule (Government, #1819.1.20000.40)

BECAUSE THE AGENCY PROMISED TO UPHOLD THE 2001 RULE

USDA [U.S. Department of Agriculture] dishonesty: The dishonesty on part of the USDA deserves comment. The USDA promised to support the Roadless Rule as it was written. While that Rule was and is inadequate, that promise was a commitment of continuity of policy. The USDA has tried at every possible moment to undermine the limited protection the Rule provides. This petition by the State of Idaho is another such weakening measure. Rather than retreat from promises, the USDA should keep the current Roadless Rule as a temporary measure and embark on changes to improve it, across the nation. (Individual, Potlatch, ID - #7994.3.20000.100)

BECAUSE THE PROCESS VIOLATES NEPA

The Idaho Petition is far from the open, honest, and informed approach required by the National Environmental Policy Act (NEPA). In our opinion, the process violates NEPA. (Recreation/Conservation Organization, Boise, ID - #1818.13.20000.131)

BECAUSE THE SCIENCE SUPPORTING THE RULE IS SUSPECT

[The] Forest Service makes up reasons to cut timber and I don't believe a single one of them. We have junk science operating courtesy of the corruption in sin city Washington DC. Absolute junk science, where the alleged "science" follows what the corrupt politicians want to make money from. It's really all about venality, greed, money, corruption, avarice, to make money for friends, pals and the greedy politicians and their rich friends. It is economic injustice at work here. (Individual, #214.7.13000.720)

BECAUSE THE IDAHO ROADLESS RULE AVOIDS APPROPRIATE CONSIDERATION OF CUMULATIVE IMPACTS ON THE NATIONAL PUBLIC INTEREST

The Idaho DEIS is concrete proof that State direction in the management of our National Forest roadless lands cannot properly include or assess the national interest in its management prescriptions. The very format and structure of the State petitioning process works in direct contradiction to proper consideration and cumulative analysis of the role each State's Roadless Areas play in the national public interest. One might even argue that the very reason the State petitioning process was implemented was to direct management of our roadless lands in a "divide and conquer" approach that by its very format would preclude any real and valid analysis of each Roadless Area's relevance to the national system of roadless lands as a whole. (Recreation/Conservation Organization, #1649.115.31000.123)

BECAUSE THE IDAHO ROADLESS RULE IS THE PRODUCT OF A BACK-DOOR AGREEMENT WITH THE STATE OF IDAHO

The U.S. Forest Service is considering the fate of our un-protected Roadless Wildlife Habitat, in a document entitled, the Roadless Area Conservation, National Forest System Lands in Idaho; Draft Environmental Impact Statement. The preferred alternative is the product of a back-door agreement with the State of Idaho. (Individual, #56.1.33500.720)

BECAUSE THE IDAHO ROADLESS RULE IS BASED ON THE RECOMMENDATIONS OF AN INTERIM GOVERNOR

I feel your plan to divide up Idaho's 9.3 million acres of Roadless Areas is a bad idea. Implementing a plan from the recommendations of an interim governor is not in the best interest of the citizens of Idaho. (Individual, #8877.1.20000.030)

**BECAUSE MINING AND TIMBER INTERESTS HAVE HAD UNDUE
INFLUENCE ON THE RULE DEVELOPMENT PROCESS**

The political impact and influence of the Simplot/FMC connection to both Governor Otter and the Secretary of the Interior in the development of the Proposed Rules cannot be ignored or understated. I believe that the Proposed Rules are a devious, politically motivated effort to specifically allow Simplot/FMC and lumber companies full access to these areas in direct opposition to the wishes of the majority of citizens and written into the 2001 Roadless Rule. (Individual, #1475.13.20000.720)

**BECAUSE THE ASSAULT ON ROADLESS AREA PROTECTIONS BY INDUSTRY INSIDERS
IN THE ADMINISTRATION IS DISGRACEFUL AND UNLAWFUL**

Our National Forests are a valuable asset to people and creatures of today and in the future, which cannot be replaced. The attack currently taking place in Idaho is disgraceful and unlawful. It is also incomprehensible how some of the persons making the decisions have such strong ties and previous relationships to lumber, paper, and mining interests. (Individual, #1121.1.40000.720)

BECAUSE THE MAJORITY OF IDAHO RESIDENTS OPPOSE THE IDAHO ROADLESS RULE

Ex-Governor Jim Risch's petition to the Forest Service to allow for development in Idaho's pristine forests is an unwelcome proposal. Recent polls indicate that Idahoans overwhelmingly oppose any such proposal, and I second this opposition. These lands not only constitute an important and unique ecosystem and wildlife habitat, but they also provide our nation with opportunities for outdoor recreation, hunting, and fishing. (Individual, #306.2.20000.2)

Even a strong majority of conservative Idahoans favor retaining the Clinton/Dombeck Roadless Rule here in Idaho. On January 9 and 10, 2008, a telephone survey was conducted by Moore Information Inc. of 400 randomly selected likely registered voters in Idaho. . . . The entire survey and analysis can be read at: <http://www.ourforests.org/pdf/summary-idaho-voters.pdf>.

My point is: the feelings of the Idaho citizens closely mirror the feelings of members of the public nationwide with respect to Roadless Areas. They want all of the Inventoried Roadless Areas protected from development regardless of the state where it is located. Roadless Areas must be managed consistently nationwide! (Individual, Grangeville, ID - #338.10-11.20000.061)

**BECAUSE THE VAST MAJORITY OF PUBLIC COMMENTS
SUPPORTED ROADLESS PROTECTIONS**

America has spoken and the Forest Service refuses to listen: . . .

The public involvement process for the Clinton/Dombeck Roadless Rule started in October 1999. The process stimulated massive public interest and response that included 1) 600 public meetings and hearings in 37 states where more than 25,000 people participated, and 2) evaluating 1.6 million written public comments. The analysis of the 1.6 million written comments revealed that about 1,520,000 (or 95 percent) favored the strongest possible protection for Roadless Areas on National Forests.

This was the most response to a government proposal in the history of the United States. Based on the clear will of the National Forest owners, President Clinton and Forest Service Chief Dombeck adopted the Roadless Rule protecting 58.5 million acres of National Forest land in January 12, 2001. On July 12, 2004, USDA [U.S. Department of Agriculture] Secretary Veneman announced that the Bush administration would propose replacing the Clinton Roadless Rule with a State Governor petition process. On July 16, 2004, the Governor Petition process was published in [the] Federal Register, inviting public comments on the new process.

After a short, 4-month time span, on November 15, 2004, the public comment period on the Bush administration's Governor petition process ended. The administration received more than 1.7 million comments that opposed the Governor Petition proposal and supported retaining the original Clinton Roadless Rule. To date, America's public roadless landscapes have remained un-plundered by the hand of man in their mindless quest for money. In spite of over 4 million public comments strongly opposing the Governor Petition process, the Bush administration's Forest "Service" still continues to peddle it to the public as if it were benefiting the public. In reality, this mirrors all other Bush/Cheney initiatives; it is a blatant license granted to corporate America to do with as they please with these roadless lands. (Individual, Grangeville, ID - #338.8-9.20000.720)

BECAUSE MANAGEMENT DESIGNATIONS WERE BASED ON FAULTY INFORMATION

The new rule also designates several hundred thousand acres of roadless land for development, with the claim that some of these areas are actually not roadless. That claim is incorrect. Also, the reasons given for opening most of these particular areas to development are quite poor, the worst of them being in the area of Johnson Creek, on the Payette NF [National Forest]. Road building on this creek will harm the Salmon River and will do nothing to gain extra fire protection for the Yellow Pine. (Individual, #223.3.62000.680)

**BECAUSE THE IDAHO ROADLESS RULE WOULD DISPROPORTIONATELY
AFFECT SOUTHEAST IDAHO**

I am opposed to the Idaho Roadless Rule. I would like to see the Clinton 2001 Rule stand. My particular concerns about this Rule have to do with southeast Idaho in particular. I think we have these different themes that the Lieutenant Governor spoke of. I just think southeast Idaho's getting the short end of the stick. This is where we live. This is where we recreate.

I think that 66 percent of that General [Forest] theme is in our area, so they talk about the smaller portion of the General Forest is a really small portion compared to the 9.3 acres, (sic) but they failed to mention that that's the largest portion affecting us. I just have a problem with that. (Individual, Inkom, ID - #9180.1.20000.600)

I guess the only reason I can't really support this plan is because of the Backcountry/Recreation recommendation and the General Forest recommendation. Southeast Idaho has been disproportionately assigned land that's been put in General Forest. (Individual, Pocatello, ID - #9192.1.20000.600)

BECAUSE THE NATIONAL FORESTS BELONG TO ALL AMERICANS

I'm writing in response to the U.S. Forest Service rulemaking process that could weaken regulations protecting more than 9.3 million acres of Idaho's undeveloped National Forest Roadless Areas. Idahoans, Oregonians, as well as all Americans, have a vested interest in protecting these lands. It is important to remember that these wild areas are not county public lands, or Idaho state public lands, but rather American public lands. They belong to all Americans, and should be managed for the long-term good of the nation. (Individual, #238.1.20000.63)

I would like to remind you that these lands belong to all Americans. The Governor of Idaho should have no more influence over the fate of these lands than me, my wife, or my baby son. Please block further development of roadless forest lands. (Individual, #1317.3.40000.123)

The "political" situation about the Forest Service excepting less protection of "roadless backcountry" instead of 9.3 million acres protection galls me. The Clinton administration had designated 8.8 million acres for wilderness protection. What business is it of the State of Idaho politicians to interfere with prior national policy on Federal public lands in Idaho? The last time I understood a basic civics course, national lands are owned by all citizens of the United States, not any State, not any (particular) business. Anything less than that is politically disingenuous for a country that prides itself as a "nation of laws." (Individual, Coeur D'Alene, ID - #8494.1.20000.123)

**BECAUSE THE GOVERNORS OF SEVERAL STATES HAVE REQUESTED
RETENTION OF THE 2001 RULE**

The proposal for such broad exemptions from the 2001 Rule for Idaho threatens not only Idaho's Roadless Areas, but other Roadless Areas around the country. A number of governors have requested the Agency to retain and implement the 2001 Roadless Rule. The governors of Virginia, North Carolina, South Carolina, Tennessee, Maine, and Pennsylvania have made such requests. A number of governors in the West, including the governors of New Mexico, Arizona, California, Oregon, and Washington, have made similar requests. Proceeding with the proposed exemptions for the Idaho Roadless Areas will determine the efforts of governors in other states to have their Roadless Areas covered by the strong protections found in the 2001 Rule. (Organization, #1803.15.20000.30)

Opposition to the Idaho Roadless Rule: Legal Concerns

2-6 Public Concern: The Forest Service should not proceed with the Idaho Roadless Rule.

BECAUSE THE IDAHO ROADLESS RULE CONFLICTS WITH COURT DECISIONS

We [Idaho Rivers United] are disappointed that the Forest Service has chosen to move forward with a flawed process that has been set aside by the Federal courts (September 20, 2006 Decision by Northern District of California). Four States, two of which are neighbors of Idaho and will directly be affected by Idaho roadless decisions, are party to this lawsuit and decision. (Recreation/Conservation Organization, Boise, ID - #1818.6.20000.140)

The 2005 Roadless Rule under which the Idaho Rule began development inappropriately conveyed responsibility for initial public involvement to the State of Idaho. The USFS decision to implement the Idaho Petition under the Administrative Procedures Act after the 2005 Roadless Rule was invalidated by the Federal Courts and the decision to not consider petitions from Tribal governments and others interested in Roadless Area management is evidence of a Federal/State political alliance. (Tribal Government/Elected Official/Agency, Plummer, ID - #1696.8.10400.760)

BECAUSE THE IDAHO ROADLESS RULE CONFLICTS WITH THE NATIONAL FOREST MANAGEMENT ACT

The National Forest Management Act [NFMA] requires all Forest Service projects to be consistent with individual land and resource management plans. The proposed Idaho Rule would effectively amend current direction in existing plans, weakening protections and providing allowances for new development activities. As a result, projects undertaken in response to the proposed Idaho Rule could overstep the bounds of existing plans that would directly conflict with statutory guidance from NFMA. (Preservation/Conservation, Boise, ID - #4156.106.20000.133)

BECAUSE THE IDAHO ROADLESS RULE MAY CONFLICT WITH TREATY RIGHTS

The Proposed Rule may have impacts on Treaty [Fort Bridger Treaty of 1868] rights or traditional cultural practices, rights reserved in land cessation agreements. The Tribes [Shoshone-Bannock] object to the Idaho Roadless Rule (Proposed Rule) as submitted by the State of Idaho, in the Draft Environmental Impact Statement (DEIS), and further request that the petition be denied and the terms of the 2001 Roadless Rule [Footnote 4: In the DEIS the 2001 Rule is referred to as the "Clinton Rule" and is one of the alternatives analyzed as the current baseline or "no action" alternative] continue to be implemented. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.22.20000.150)

The original boundary for the Fort Hall Reservation has been modified through a series of land cessation agreements to its current size, [for] which the Tribes [Shoshone-Bannock] reserved certain rights, in addition to those rights guaranteed by the Treaty [Fort Bridger Treaty of 1868], to ceded lands that remain part of the public domain [Footnote 5: "So long as any of the lands ceded, granted, and relinquished under this treaty remain a part of the public domain, Indians belonging to the above mentioned Tribes (Shoshone-Bannock Tribes), and living on the reduced reservation, shall have the right, without any charge therefore, to cut timber for their own use, but not for sale, and to pasture their live stock on said public lands, and to hunt thereon and fish in the streams therefore." (31 stat 672, Article IV)] Several of the Inventoried Roadless Areas (IRA[s]) are within that original reservation boundary and thus subject to the terms of those particular cessation agreements. The Tribes continue to utilize the IRAs within the original boundaries of the reservation for Treaty rights and traditional cultural practices. The Proposed Rule will impact Tribal rights and interests in those IRAs and does not adequately address the nature and scope of those impacts. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.23.20000.150)

Article IV of the Treaty [Fort Bridger Treaty of 1868] reserves the right to hunt on "unoccupied lands of the United States," which provides for subsistence purposes. IRAs [Inventoried Roadless Areas] provide

strongholds of biological diversity for native species, which supports the Tribes' subsistence rights and policy. The Proposed Rule would affect Tribal [Shoshone-Bannock] rights by reducing the protections currently in place for IRAs, altering their natural condition and further diminishing biological diversity. IRAs contribute high-quality habitat, consistently yielding strong, sustainable populations of native species. Removing protection from even one IRA diminishes the ability of native species to maintain current populations and genetic diversity by further fragmenting habitat. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.34.20000.150)

TO HONOR THE SPECIAL RELATIONSHIP BETWEEN THE FEDERAL GOVERNMENT AND NATIVE AMERICAN TRIBES

Because of the special relationship that exists between the United States government and the Shoshone-Bannock Tribes, recognized through the Fort Bridger Treaty of 1868, the Tribes request that the State of Idaho's petition be denied. The Tribes hereby incorporate by reference those comments submitted by the Greater Yellowstone Coalition, for the Proposed Idaho Roadless Rule. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.17.20000.150)

BECAUSE THE AGENCY FAILED TO CONSULT WITH NATIVE AMERICAN TRIBES

Federal laws and policies require that meaningful consultation occur throughout rulemaking that has the potential to impact Tribal rights or interests. The FS [Forest Service] neglected to engage consistently in the consultation process with the Tribes and have drafted a Rule that does not reflect our unique Tribal rights and interests. The Tribes [Shoshone-Bannock] demand that established consultation protocol take place prior to the issuance of any final decision. Meaningful consultation is not bringing a decision to the Tribes without taking the time to engage the Tribes to discern our concerns during the scoping process. To further illustrate the lack of meaningful consultation, the Tribes were sent a letter addressed to another Idaho Tribe. The Tribes demand that Federal laws, policies, and FS-Tribal consultation protocol are followed consistently. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.101.10300.720)

BECAUSE THE IDAHO ROADLESS RULE MAY CONFLICT WITH OTHER FEDERAL LAWS THAT APPLY TO NATIVE AMERICAN INDIAN TRIBES

The Tribe is deeply concerned whether the Rule is commensurate with Federal laws that apply specifically to Indian Tribes, such as the United States' fiduciary responsibilities to manage Tribal trust resources for the benefit of the Tribe, or generally the Forest Service's responsibilities under the National Forest Management Act (NFMA) to conduct activities on the Forest that are consistent with applicable land resource management plans. Accordingly, the Tribe does not endorse the proposed Rule and instead reiterates its support for maintenance of the Roadless Area Conservation Rule ("2001 Roadless Rule"). (Government, #1819.4.20000.130)

BECAUSE THE IDAHO ROADLESS RULE WOULD SET A PRECEDENT AND OPEN ROADLESS AREAS TO INCREASED DEVELOPMENT

The proposed action designates more than half of Idaho's 9,304,200 acres of inventoried federally public roadless land as potentially available for road building and timber and mineral extraction, at levels above those permitted by the 2001 RAR [Roadless Area Review]. By any reasonable estimation, this is widely excessive, and inconsistent with the Secretary's commitment to [the] 2001 RAR. Further, an exception of this magnitude would set a precedent that compromises the Forest Service's position for upholding the 2001 RAR protections elsewhere, and seems like a poor policy move. (Individual, #5.2.23000.160)

One of the many impacts of this Roadless Area Conservation Draft EIS will be to open the door to the destruction of our Roadless Wildlife Habitat heritage. The door will be opened to further development within Idaho and will set precedents for other regions to follow. Presently, these areas are protected from destructive development. This Roadless Area Conservation Draft EIS will change those protections. From the existing status of protected wildlife habitat areas, the door will be opened to develop many of these areas. I do not want our Roadless Wildlife Habitat Areas ruined by this short-sighted plan. (Individual, #18.7.20000.350)

The 9.3 million acres of National Forest Roadless Area in Idaho, more than in any other state except Alaska, are the unprotected wildlands which conservationists have been trying to save from development since the days of RARE [Roadless Area Review and Evaluation] I, in the early 1970s. They are the tops of our watersheds, support outstanding biodiversity, contain most of our best fish and wildlife habitat, and provide opportunity for primitive outdoor recreation. But the proposed Idaho Roadless Rule would allow development of many of the Roadless Areas, and the resulting loss of these values. (Individual, #1456.2.20000.2)

**BECAUSE THE IDAHO ROADLESS RULE WOULD SET
A POTENTIALLY DESTRUCTIVE PRECEDENT**

If the Bush administration approves Idaho's petition to open Roadless Areas for logging, mining, road construction and other development, it will set a precedent that many other states are likely to follow. This domino effect could jeopardize Roadless Areas across the country. I don't want to see [that] the last remaining pristine wilderness this country has disappeared. Please keep Roadless protection intact for the entire State of Idaho. (Individual, #143.3.40000.100)

Please accept my comments in the spirit of genuine concern with which they are offered. As a U.S. citizen with a great respect and gratitude for the blessings of our common heritage, I cannot but oppose any proposal such as the Idaho proposal which would result in creating the exceptions which could and would lead to undermining the Rule. As [a] citizen of the State of Wisconsin, I cannot but also oppose the Idaho proposal as a possible template for ultimately developing the National Forest Roadless Areas in my own state of Wisconsin. I look forward to a U.S. Forest Service decision denying the Idaho proposal. (Individual, #321.6.20000.100)

**BECAUSE THE IDAHO ROADLESS RULE RUNS AGAINST THE PUBLIC'S WILL
AND WOULD SET AN UNDESIREABLE PRECEDENT**

Americans have made it clear time and time again that they want to safeguard all 58.5 million acres of our last remaining Roadless Areas. Earthjustice is concerned that the proposal for Roadless Area management in Idaho would set an alarming precedent. (Individual, #218.61.20000.100)

BECAUSE THE IDAHO ROADLESS RULE WILL INVITE APPEAL AND FURTHER LITIGATION

We [the Coeur d'Alene Tribe] recognize the importance of resolving the decades of controversy surrounding Roadless Area management. The proposed Idaho Rule will not accomplish that. The NEPA irregularities and management limitations of the proposed Idaho Rule invite appeal and ongoing litigation. (Tribal Government/Elected Official/Agency, Plummer, ID - #1696.17.20000.131)

**BECAUSE THE IDAHO ROADLESS RULE WILL GENERATE FURTHER LITIGATION
AND WOULD PRIVATIZE NATIONAL FOREST MANAGEMENT**

It [the Idaho Petition Process] will not resolve the Idaho Roadless issue. If the IRR [Idaho Roadless Rule] is adopted and implemented, it will generate further significant controversy and protracted litigation. Also, it would be a significant first step towards privatization of National Forest management. The Clinton Roadless Rule of 2001 resolved the issue and was overwhelming supported by the National Public. To overthrow this National mandate to satisfy Idaho's extractive industries is clearly unethical and appalling. (Individual, #268.73.20000.2)

**BECAUSE THE IDAHO ROADLESS RULE IS INCONSISTENT
WITH THE INTENT OF THE 2001 RULE**

I have been asked to comment, and my reading of the proposal leads me to the following conclusions: The Idaho proposal would completely change the concept of the Federal "Roadless Area Conservation" [Rule]. The 2001 Roadless Rule was intended to create an extension and protection of Wilderness areas, to preserve a special environment for posterity. "Roadless" was intended to mean roadless. (Individual, #8.1.20000.650)

**BECAUSE THE IDAHO ROADLESS RULE IS ILLEGAL
AND MORALLY UNCONSCIONABLE**

Not only are these proposals illegal, they are morally unconscionable. I am not normally a politically active person, but these short-sighted assaults by the greedy on land owned by the citizens of this state is so offensive that I take it personally and will do whatever it takes to prevent it. (Individual, Boise, ID - #1096.3.20000.700)

**BECAUSE THE IDAHO ROADLESS RULE IS INCONSISTENT
WITH EXISTING FOREST PLANS**

The proposed Idaho Rule makes land management prescriptions based on prescriptions in Forest Plans for affected areas, yet many of those Forest Plan prescriptions do not allow for the same intensity of development activities in the affected areas that the Idaho Rule would permit. This disconnect between the Forest Plan prescriptions and the proposed Idaho Rule not only demonstrate the irrationality of the Idaho Rule prescriptions but also necessitates a NEPA analysis where the Rule proposes to allow logging, etc., in areas that are currently off limits to such activities under the governing Forest Plan. (Organization, #1693.47.22310.131)

Opposition to the Idaho Roadless Rule: Federalism versus States Rights Considerations

2-7 Public Concern: The Forest Service should not proceed with the Idaho Roadless Rule.

BECAUSE STATE GOVERNMENTS ARE TOO VULNERABLE TO INFLUENCE

Only the national government can protect them [Idaho's Roadless Areas]. State government has shown itself to be too vulnerable, in general, to influence. (Individual, Houston, TX - #1309.3.10100.050)

**BECAUSE THE IDAHO ROADLESS RULE GIVES TOO MUCH AUTHORITY
TO THE STATE OVER FEDERAL LANDS**

Since Idaho's NFS [National Forest system] Roadless Areas are Federal public lands, their management should reflect nationwide interests, priorities, and preferences. States should be able to make recommendations regarding Federal lands within their borders. However, through this petition process, the Federal government (USDA [U.S. Department of Agriculture]/USFS) has given the petitioning state too much of a role, and too much influence in determining national land management policy. The Petition process may have added to this inequity by placing an inordinate degree of control with the governor's office and the local county commissioners. The governor's office established the ground rules and guidelines used to develop the State's recommendations. These guidelines, which the Petition calls the Guiding Principles, profoundly influenced the outcome of the proposal. (Individual, #1695.12.10110.60)

**BECAUSE THE FOREST SERVICE HAS NO AUTHORITY TO CEDE
ITS JURISDICTION TO ANOTHER BODY**

It [the ruling by Judge La Porte] appears to make the proposed Rule by the USFS literally dead on arrival. It seems that any final determination of USFS to approve this proposed Rule is illegal on its face, and even if it is legal, it is unenforceable and inconsistent with its current policy. I understand the proposed Rule arises from a Petition by the State of Idaho, but I also understand that the USFS has absolutely no authority to cede its jurisdiction over public wildlife areas to any other body. (Individual, #746.1.20000.160)

**BECAUSE THE IDAHO ROADLESS RULE ILLEGALLY TRANSFERS FEDERAL
LANDS TO STATE AND LOCAL CONTROL**

The NRC [Northern Rockies Chapter] members of the Sierra Club feel this new plan possibly hands previously protected, federally owned forest management decisions illegally into the hands of State and local officials like the Implementation Commission. This could allow individuals or subsidized industries to further the current trend of degrading our public lands ecological integrity, (not to mention

the \$10 billion USFS road maintenance deficit) while the lasting effects of roads, weeds, fragmentation, and watershed degradation will last far into the future. (Organization, #1697.5.20000.201)

Opposition to the Idaho Roadless Rule: Environmental Concerns

2-8 Public Concern: The Forest Service should not proceed with the Idaho Roadless Rule.

Because it would open Roadless Areas to increased development. The video of Lt. Gov. [Lieutenant Governor] Risch explaining his Petition submitted to the Forest Service conveniently omits its real impacts to the Roadless Areas in Idaho: According to the Forest Service's DEIS for the Roadless Rule for the State of Idaho, Chapter 2; Section 2.5, pages 62–72.: <<http://roadless.fs.fed.us/idaho.shtml>> - Over 6 million acres or two-thirds of the Inventoried Roadless Areas would lose some degree of their "natural processes and roadless characteristics."-An increase in phosphate mining is expected to cause selenium poisoning of drinking water and aquatic species deaths. 545 million tons of phosphate would be made available from mining on nearly 8,000 roadless acres by opening-up an additional 12,000 acres of unleased areas on roadless acres previously off limits.-Eight times more roadless acres are projected to be logged per year.-Over half a million additional roadless acres would be made available for mining. (Individual, #338.16.10440.200)

This plan will release over two-thirds of the remaining un-protected wild lands to damaging development. It will categorize wild land into four new "management themes" (1) Wild Land Recreation, (2) Primitive, (3) Backcountry/Restoration, and (4) General Forest, Rangeland, and Grassland. This preferred alternative opens the door to varying degrees of specific developments within each category. All categories, under this plan, will lose protections that Roadless Wildlife Habitat Areas presently have. This plan is unacceptable; these areas must remain pristine Roadless Wildlife Habitat. (Individual, #56.2.23100.200)

Not only would this legislation allow Idaho to defile the National Forest land there, it would allow all states to commence destruction of National Forest land. I certainly do not want that to happen in Idaho, or here in Michigan, or anywhere, for that matter. Kill this legislation, not our wildlands, please. (Individual, #409.5.20000.123)

I am writing to express my objections to the Roadless Area Conservation, National Forest System Lands in Idaho; Draft Environmental Impact Statement as it now stands. Under this plan, over two-thirds of the remaining un-protected wildlands will be opened to damaging development. One of the suggested categories, General Forest, Rangeland, and Grassland, will be heavily impacted with roads, logging, and mining. This management category will be the most destructive element of this DEIS, turning some areas in southern Idaho from pristine Wildlife habitat to open-pit and mountain-top removal mines, and creating roads in other pristine areas, for example in northern Idaho. Additionally, all the other categories under this plan will lose the protections that Roadless Wildlife Habitat Areas currently have. The management theme for Backcountry/Restoration, despite its rhetoric, will allow road construction, logging, and other development on more than 5 million acres. The Primitive management theme will open the door to some logging and road building on 1.6 million acres. These areas will then fall short of the Forest Service's recommended Wilderness suitability criteria. (Individual, #14.1.23100.330)

BECAUSE ROADLESS LANDS ARE OUR HERITAGE

These [Idaho Roadless] lands are our heritage, our history, and our future. They are what make Idaho the greatest state in the nation. Please do not change the terms of the 2001 Roadless Rule. Give the citizens of Idaho the chance to choose, and our lands the chance to remain great. (Individual, #237.3.20000.740)

Spanning 58.5 million acres in 38 states, America's National Forest Roadless Areas contain some of our nation's last pristine forests. I recreate with my children in the back-country and find the current "roadless" initiative to be limiting and unfair. I wish to share with my children more of America's

National Forests, but with roads and trails closed to biking, motorcycles, and off-road vehicles, it leaves few options for the citizens of our country. Please return these lands to the people! (Individual, #27.1.64200.530)

**BECAUSE THESE AREAS ARE THE LAST INTACT FOREST ECOSYSTEM
IN THE LOWER 48 STATES**

As someone who cares about keeping America wild, I am writing to urge you to maintain protections for all of Idaho's Roadless Areas under the current Roadless Area Conservation Rule. Idaho contains more National Forest Roadless Areas than any other State except Alaska, making up the core of the last intact forest ecosystem in the lower 48 States. This is the last place where all the native plants, fish and wildlife of the northern Rockies, from the smallest plant to the largest predator, can still be found. These public lands belong to all Americans and should be safeguarded as a national treasure. As our nations wildlands become fewer and farther between, it is incumbent upon us to protect what we have left for future generations to enjoy as we do. (Individual, Harlingen, TX - #7993.1.20000.002)

BECAUSE ROADS PERMANENTLY COMPROMISE ECOSYSTEM INTEGRITY

An analogy I'm going to give you, roads in the forest are like tattoos. Tattoos are permanent as are roads. Even with the strictest regulations, when you get a tattoo you run the risk of infection. Just as building a road opens up the door for invasive species to move in. When tattoos get old and faded, they are still there. Just as an abandoned road bed, they're still there.

Should you decide to professionally remove a tattoo even with the best technology, it still leaves a scar. Once you build a road, even if it's reclaimed with the best technology, it still leaves a scar.

Once you compromise the original integrity of an ecosystem, you can never fully rectify the change, the damage. So don't let the Idaho Rule go forward. (Individual, Freedom, WY - #9152.2.20000.680)

**BECAUSE THE IDAHO ROADLESS RULE DOES NOT PROVIDE PROTECTION
FOR DIVERSITY OF PLANT AND ANIMAL COMMUNITIES**

Among the National Forest Management Act (NFMA) substantive requirements is the duty to provide for the diversity of plant and animal communities [Footnote 30: See 16 U.S.C. [Section] 1604 (g)(3)(B)]. The Proposed Rule does not provide the same level of protection for various plant and animal communities that will be needed to promote biological diversity among Idaho's forests. The Proposed Rule takes an approach that does not promote the preservation of unique communities of native plants and animals throughout Idaho, especially by choosing to sacrifice Southern Idaho's high sagebrush hills and the unique aspen-conifer interface. The Tribes [Shoshone-Bannock] rely on these unique resources for subsistence and traditional cultural practices. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.72.20000.133)

TO PROTECT RECREATION, CLEAN WATER, AND FISH AND WILDLIFE HABITAT

I strongly oppose the Roadless Area Conservation Draft EIS for the following reasons: Roadless Areas need to be roadless for quality recreation, clean water, [and] fish and wildlife habitat. True wildlife habitat should be protected for future generations to enjoy. (Individual, #226.1.30000.2)

**BECAUSE ROADS DEGRADE NATURAL AREAS, INTRODUCE EXOTIC
SPECIES, AND RUIN WILDLIFE HABITAT**

I believe Idaho's existing Roadless Area should remain roadless and not be reduced in size as suggested by former Idaho Governor James E. Risch's Petition. I am requesting you maintain Idaho's existing 9.3-million-acre Roadless Area for the following reason: Roads and the resulting development they introduce permanently degrade natural areas, introducing exotic species such as spotted knapweed and ruining wildlife habitat. Mitigation and restoration do not replace non-disturbance. (Individual, #1937.3.20000.680)

**BECAUSE ROADLESS AREAS CONTRIBUTE TO BIODIVERSITY AND ECOLOGICAL
HEALTH AND ACT AS A HEDGE AGAINST CLIMATE CHANGE**

I have visited the National Forests in Idaho on six occasions. I have also had the opportunity in my professional career to study the history of the National Forest in regards to stream flow and water quality. I treasure the times spent camping and hiking in the Idaho forest, enjoying their spectacular

scenery, the woods, meadows full of wildflowers, wild mountain streams, the chance to view wildlife, and the peace and quiet of these places, so rare now in our everyday lives. The draft Rule proposed by the Forest Service does not provide sufficient protection for the Roadless Areas in Idaho. The importance of the forests in moderating temperatures and water flow and in protecting the ecological health not only of the forests, but also of the surrounding countryside, has been recognized by naturalists in the United States since the 1860s, if not earlier. Today more than ever we need to preserve the Roadless Areas to help to protect, maintain, and restore biodiversity and ecological health. Global climate change and the increasing demands for clean water require that we conserve our remaining wild forests, and that in place of extractive industries, find ways to reduce usage of, reuse, and recycle materials. Please provide full protection for the Roadless Areas in Idaho based upon the 2001 Roadless Area Conservation Rule. (Individual, #222.1.20000.2)

BECAUSE ROADLESS AREAS ACT AS A HEDGE AGAINST CLIMATE CHANGE

The IRR [Idaho Roadless Rule] program that you describe is inconsequential within the context of ameliorating the adverse effects of climate change. (Recreation/Conservation Organization, Boise, ID - #1723.45.20000.250)

BECAUSE WEAKENING PROTECTIONS DOES NOT BENEFIT LONG-TERM FOREST HEALTH, FIRE REDUCTION, PRIVATE PROPERTY PROTECTION, OR RECREATIONAL ACCESS

Weakening rules for Roadless Areas protection does not benefit long-term forest health, fire reduction, private property protection, or recreational access. Insect damage has always been part of forest ecology. Road construction for salvage logging can't be supported because of adverse effects to forest ecology. Increasing insect damage involves several species and is a function of local climate warming giving a boost to the insect's life cycles. Warming is not predicted to be short-lived so damage will likely expand for a while to larger tracts and higher elevations until this natural process produces a new equilibrium. The exceptions for insects and fire protection could open most of the Roadless Areas to new road building under proposed "facilitating forest health activities" language and should not be done. (Organization, #1804.12.42000.260)

TO PRESERVE STREAM AND WATER QUALITY

Stream and water quality would be degraded under this new proposed Rule and I am opposed to this. (Individual, #615.4.20000.243)

TO PROVIDE FOR CLEAN WATER RECHARGE AND PROTECT SENSITIVE SOILS

Roadless Areas are a vital resource for clean water recharge. Clean snow pack mean clean aquifers and streams; 235,200 acres of Roadless Areas with highly sensitive soil will be opened to road construction for mining. This construction is likely to have negative impacts on these sensitive soils. In Idaho, eight times more roadless acres are projected to be logged and four times more roads are projected [to] be built each year. Despite the assurances of State and Federal officials that this Idaho Roadless Petition seeks to maintain roadless characteristics, it is brutally clear that this proposal does anything but. At stake here is forestlands. Idaho's National Forests are owned by all Americans, and should be managed accordingly. For these reasons and more, I ask that you suspend this Petition process and reinstate the 2001 Roadless Area Conservation Rule to ensure proper protections for Roadless Areas in both Idaho's portion of the Greater Yellowstone Ecosystem and the State of Idaho as a whole. (Individual, Owings Mills, MD - #7991.2.20000.002)

BECAUSE THE IDAHO ROADLESS RULE WOULD WEAKEN PROTECTIONS FOR BIG GAME AND OTHER WILDLIFE

The [Idaho state] Petition goes too far in weakening protection for big game and other wildlife in terms of new projects. The 2001 Roadless Rule provides for management with "beneficial" effects to animals and habitat. Decreasing the protections for these animals and wildlands is unacceptable. (Individual, #238.6.20000.860)

BECAUSE THE IDAHO ROADLESS RULE WOULD RESULT IN GREATER ENVIRONMENTAL EFFECTS THAN THE 2001 RULE

According to the Summary of Net Benefits of the Proposed Rule and Alternatives, there is trade-off in concrete benefits to risk with the Idaho Rule. Scenic quality will decline; wilderness experience will decline; noxious weeds will increase; roads and their adverse impact will increase; over 13,000 acres will be leased to Simplot's phosphate mining company where water quality, wildlife habitat, and hunting and fishing will be eliminated or destroyed; wildlife habitat overall will decline; recreational opportunities may be affected in some areas; and there's no benefit to schools through the timber cutting on these lands. The Idaho Rule does claim to reduce insects and disease from the forests; reduce fire danger (fuel management); increase lease land for mining (phosphates); and jobs may increase. Overall, the Idaho Rule is not worth changing from the 2001 Rule and may be detrimental to tourism and the environment. (Individual, #308.11.20000.2)

BECAUSE ONCE IDAHO'S ROADLESS AREAS ARE GONE, THEY WILL BE GONE FOREVER

This proposition is painfully ignorant, short-sighted, and greedy. Please don't let this [Idaho Roadless Rule] happen! Once our Roadless Areas are gone they will be gone forever, and you who make the decisions will be to blame. (Individual, #203.3.20000.700)

Once destroyed, we can never replace a wilderness area with the same ecosystem. Keep the 2001 Roadless Area Conservation Rule in place and preserve our last wild lands. (Individual, Greenbank, WA - #2454.1.20000.200)

BECAUSE THE GENERAL FOREST THEME WOULD ESSENTIALLY REMOVE ALL PROTECTIONS FOR ROADLESS AREAS

The proposed Rule addresses 9.3 million acres which are now managed under the 2001 Roadless Rule. The Idaho proposal reclassifies the 9.3 million acres into five categories with different "management themes": Wild Land Recreation, 1.4 million acres; Primitive, 1.7 million acres; Backcountry/Restoration, 5.5 million acres; Special Areas of Historical and Tribal Significance (SAHTS), 68,600 acres; [and] General Forest, Rangeland, and Grassland (GFRG), 600,000 acres. The GFRG category simply carves out 600,000 acres and returns those to management under the old Forest Plans adopted before the 2001 Rule. The Idaho Rule ends all protection for the roadless values of these lands. (Organization, #1698.3.23100.200)

Opposition to the Idaho Roadless Rule: Forest Management Concerns

2-9 Public Concern: The Forest Service should not proceed with the Idaho Roadless Rule.

BECAUSE THE FOREST SERVICE CANNOT AFFORD TO MAINTAIN EXISTING ROADS

The [Idaho State] Petition puts too much of a burden on American taxpayers. The US Forest Service is already faced with a backlog of \$660 million in road maintenance for the 34,000 miles of roads on Idaho's Forest Service land. It makes no sense to open roadless backcountry areas up to new road construction when the Forest Service does not have the resources to manage the roads it already has. (Individual, #238.7.20000.860)

The USFS has a backlog of billions of dollars of roadwork that has not been funded; yet, you propose to build more. I want to go on record in opposition to this proposal. (Individual, #1424.3.20000.680)

The reasons for protecting what remains are fairly obvious but they are: Roads cost money to maintain -- where will that come from? The Forest Service is already strapped with maintaining the many miles they currently are responsible for. And where does the money for regulation come from? It is very clear that regulation to ensure against violations of motorized users is not possible with current budget levels of land management agencies. (Individual, #844.4.40000.800)

**BECAUSE THE FOREST SERVICE DOES NOT HAVE THE FUNDS TO SUPPORT
THE CURRENT MANAGEMENT PROGRAMS**

Mining operations of any kind have forever impacted the natural areas where they have been allowed, no matter the checks agreed to in legislation. Our Forest Service [and] Fish and Game agencies do not receive sufficient annual funding as it is to carry out existing management programs. They are agencies that are constantly on the fiscal chopping blocks at the local, State, and national levels. Any additional management programs as the result of changing existing management headaches of Roadless Areas will produce nothing but negative results. For the future, I cannot support any legislation that would further allow changing roadless, wilderness areas for any other purpose than what now exists as a non-renewable, natural resource. (Individual, #178.3.14000.160)

BECAUSE MINOR CHANGES OFTEN ADD UP TO MAJOR CHANGES

None of this proposed new roadless plan for protection makes any sense to me. I am totally against it. I remember when Jim Caswell promised us at Pierce Idaho, the Lolo Trail corridor would be the same after the bicentennial as it was before. Now we have outhouses that never were [there] and signs that don't belong, and are incorrect, but the Forest Service said they were only doing minor changes. Minor changes add up after a while to major changes. I am afraid the new proposed roadless "protection" plan will give us major changes in our wild Idaho backcountry—public land. Changes I and many others would be sad to see. The majority of the American people have already spoken on our Federal roadless land; they want it to remain wild. (Organization, #1816.26.20000.200)

**BECAUSE THE 2001 RULE PROVIDES ADEQUATE PROVISIONS
TO ADDRESS FIRE AND FOREST HEALTH ISSUES**

The proposal falls short in a number of ways. The [Idaho State] Petition is too reckless when it comes to development in roadless backcountry areas. Of the 9.3 million acres of roadless wildlands currently protected in Idaho, the petition would open up 5.2 million acres to road building for "forest health" purposes. Similarly, it would allow logging on 7.6 million [acres] for "forest health purposes"; and it would open up an additional 609,500 acres to full development for commercial logging, roads, mining and other industrial development. These changes are not necessary. The 2001 Roadless Area Conservation Rule already contains provisions that allow responsible management to address fire and forest health concerns. (Organization, #582.12.20000.2)

The Idaho proposal paints a "kick me" sign on the back of every Forest Service manager, and the timber industry will be quick to take advantage of it. Remember, some forestry schools still teach that logging is necessary for "forest health." Nothing in the Rule sets a clear limit to how much logging and road-building could be done under these broad, vaguely written exceptions. The Forest Service should stick with the clear exceptions already spelled out in the 2001 Rule. They provide for urgent needs in case of fire, insects, and disease without giving the whole ballgame away. (Individual, Baltimore, MD - #6549.4.20000.260)

The Tribes [Shoshone-Bannock] have researched the importance that both the eco-tourism and the timber industry play in Idaho's emerging 21st century economy [Footnote 31: The Wilderness Society reports that, "Although 98 percent of the forest identified as needing treatment within the Wildland-Urban Interface (WUI) in Idaho are outside Roadless Areas, there are still a small number of Roadless Areas near homes and communities that may warrant concern. That is why the prescriptions of the 2001 Roadless Area Conservation Rule allow for flexibility for human health and safety. According to fire officials, forest-thinning and prescribed fire projects like the one near Silver Creek Plunge resort were critical to the protection of homes and communities. The Idaho Statesman reported in October 2006 that the thinned area slowed the blaze, and gave firefighters the flexibility that they needed to save every structure in the 45,000 acre Rattlesnake Fire area. Similarly, near Yellow Pine, a fire burned across many acres, but all nearby buildings escaped the blaze because thinning and prescribed fire created a buffer in the Wildland-Urban Interface. It is important to note that neither of these thinning and prescribed burning projects required any road construction, and both of these projects were within the guidelines of the 2001 Roadless Conservation Rule. Communities and infrastructure were well-protected

from fire in Idaho this past year—without veering from the guidelines of the 2001 Rule, and without the construction of a single road.”

<http://wilderness.org/Library/ Documents/upload/Roadless%20background%20TWS%20Anderson%20Jan%202008.pdf>].

Timber, as an industry, has provided fewer jobs than historical levels. Revenue from eco-tourism (hunting, fishing, recreation) has created a sizable industry that positively impacts Tribal communities with IRAs [Inventoried Roadless Areas] nearby. The trees in Idaho’s IRAs are worth more as an inseparable part of the eco-tourism industry than for the short-term, non-sustainable timber industry’s profit. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.83-84.70000.870)

**BECAUSE THE IDAHO ROADLESS RULE DOES NOT PROVIDE
FOR APPROPRIATE STEWARDSHIP**

This Rule does not embody the ideal of stewardship and any statement to the contrary is misleading. The Tribes request that any management of the IRAs [Inventoried Roadless Areas] give due consideration of conservation for future generations of Tribal members. The Tribes should not be forced to bear the burden of unjust management that adversely impacts Tribal rights and traditional cultural practices [Footnote 32: United States Constitution, Article VI, provides that treaties are the supreme law of the land and other acts of Congress. The Tribes question the ability of an administrative agency to enact rules that adversely affect Treaty rights without express delegation from Congress]. True stewardship of these Roadless Areas will require that IRAs are preserved in their current condition so that our posterity may enjoy the natural features associated with these IRAs that we do. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.93-94.20000.740)

**BECAUSE THE IDAHO ROADLESS RULE OPENS TOO MUCH LAND
TO EXTRACTIVE INDUSTRIES**

Both the Forest Planning process and this Idaho Roadless Rule are characterized by token consideration for those that value wilderness and Roadless Area conservation and preservation. Whereas, the allocation for development of the Roadless Areas (timber harvest, roading, and mining) totaled some 80.7 percent of the 9.3+ million acres. This can hardly be construed as a fair and objective process. Your continuum of management themes can best be described as flowing from nothing new to a blatant public subsidy to Idaho’s extractive industries. (Recreation/Conservation Organization, Boise, ID - #1723.9.10400.720)

BECAUSE THESE AREAS DO NOT NEED TO BE MANAGED

I’m writing because I’m strongly opposed to opening up Idaho’s Roadless Areas, by building roads, or allowing any form of mining or timber activities. These resources are precious ones, and belong to our future generations as much as they belong to us. They do not need be “managed” by us; they need to be left alone. (Individual, #884.1.40000.740)

Opposition to the Idaho Roadless Rule: Recreation Concerns

2-10 Public Concern: The Forest Service should not proceed with the Idaho Roadless Rule.

BECAUSE IDAHO’S ROADLESS AREAS PROVIDE HIGH-QUALITY RECREATION

I am writing to voice my opinion on the [20]07 Roadless Initiative that is being proposed for Idaho and all northwest states for that matter. This legislation should not be supported. My wife and I grew up in Idaho and spent a lot of time recreating in the mountains. We have spent time all over the state from Island Park, the Big Hole Mountains, the Sawtooths, Coeur d’Alene Mountains, Selkirk, [and] Saint Joe to name a few of the areas we frequented. We love to visit the mountains and do so as often as we can. We enjoy taking our family of five and enjoying the beautiful scenery, and do so in a variety of ways. We enjoy backpacking, hiking, snowmobiling, riding ATVs [all-terrain vehicles], camping, picking huckleberries, and just plain driving up the Forest Service roads. (Individual, #250.6.20000.500)

**BECAUSE THE PROPOSED RULE WILL NEGATIVELY IMPACT
THE MOTORIZED RECREATION INDUSTRY**

By making these areas non-motorized, you are very effectively shutting down 3 major industries that help keep Idaho's economy alive. It [the Idaho Roadless Rule] will totally kill the motorcycle, snowmobile, and ATV [all-terrain vehicle] businesses and put literally thousands of tax-paying Idahoans out of work. It will destroy our tourist industry, as thousands and thousands of people come to Idaho and spend their hard-earned money to recreate in our public lands with their snowmobiles, motorcycles, and ATVs. (Individual, #241.3.52200.870)

BECAUSE MOTORIZED USE WILL BE RESTRICTED

Please do not support the 2007 Roadless Initiative for Idaho. This initiative would make 9.3 million acres of Idaho's public lands non-motorized only. In my book that is not multiple use. (Individual, #274.1.20000.640)

**BECAUSE IDAHO ROADLESS AREAS PROVIDE HIGH-QUALITY RECREATION
AND CONTRIBUTE TO THE LOCAL ECONOMY**

This plan is unacceptable. It will impact over two-thirds of the remaining 9.3 million acres of pristine Roadless Wildlife Habitat Areas in Idaho, and severely reduce its value for wildlife. Idaho's undeveloped Roadless Areas provide the best fishing and hunting opportunities and generate millions of dollars per year for Idaho's economy. These areas are critical for fish and wildlife habitat; clean water; and quality recreation such as hunting, fishing, and hiking. (Individual, #14.5.40000.870)

The [Idaho Roadless] Petition fails to recognize the economic importance of intact Roadless Areas. The drive to open millions of acres to road building, logging, mining, and other development ignores the millions of dollars these lands bring into the Idaho economy each year from outdoor recreation activities such as hunting, camping, hiking, and rafting. (Individual, #238.8.20000.870)

BECAUSE ROADLESS AREAS SHOULD BE PRESERVED FOR RECREATION USES

I am writing in response to the desire by some to open up Roadless Areas in Idaho for logging, mining, and road construction. These areas are important to keep as pristine forests to be used in less impacting ways by the people of this country to recreate in and not to be sold off to make some select few wealthy. (Individual, #284.1.40000.57)

**BECAUSE THE PROPOSED RULE WILL NEGATIVELY IMPACT
BIG GAME HABITAT IN SOUTHEAST IDAHO**

Roadless Areas have been shown to provide important habitat security for big game animals. Too many roads are detrimental to wildlife. They increase the vulnerability of these animals and they result in state fish and wildlife agencies limiting hunting seasons and available tags.

Now, if the current plan is successful in lowering management standards on 398,000 acres of the Caribou-Targhee, these areas will become available for new roads for geothermal, oil and gas, and timber, as well as phosphate mining. They will impact negatively big game habitat in southeast Idaho. (Recreation/Conservation Organization, Rexburg, ID - #9222.2.20000.560)

TO PROTECT NON-MOTORIZED RECREATION OPPORTUNITIES

Of particular concern to our members [Northern Rockies Chapter of the Sierra Club] are the more than 7.7 million acres of the 9.3 million Inventoried Roadless Acres that under Idaho's plan would be subject to logging, road building, and expansion of ORV [off-road vehicle] trails. The roadless lands across Idaho are important to our members who live here and enjoy many opportunities to hunt, fish, hike, bike, ski, and birdwatch in these areas. They enjoy these many forms of recreation and seek solitude provided by our roadless lands as well. (Organization, #1697.1.20000.800)

Outdoor Alliance believes that the proposed IRR [Idaho Roadless Rule] is contrary to the best interests of not only our country's human-powered outdoor recreation community, but also the unique natural resources contained in the various Forest System Roadless Areas in Idaho. Indeed, the proposed IRR amounts to reduced protection and increased extractive development of places that our membership

treasures for the incomparable recreational experiences they provide. Nationwide, opportunities to experience wild America are rare and becoming more rare as time passes. Releasing a significant portion of these finite lands to resource extraction will negatively and materially impact our memberships' interests. (Organization, #1821.2.20000.510)

Opposition to the Idaho Roadless Rule: Social and Economic Concerns

2-11 Public Concern: The Forest Service should not proceed with the Idaho Roadless Rule.

TO PROTECT IDAHO'S ECONOMY

This [20]07 Roadless Initiative will destroy our fragile Idaho economy, put thousands of Idahoans out of work, and kill our forests. Please do not support this initiative. (Individual, #241.5.20000.2)

BECAUSE THE AGENCY SHOULD SEEK TO INCREASE REVENUES IN OTHER WAYS

Let the Forest Service manage our public lands, they are the experts. They just need the proper funding to accomplish their mission, and this [opening Idaho Roadless Areas] is not the way to get it (Individual, #852.5.40000.800)

BECAUSE THE IDAHO ROADLESS RULE ALLOWS EXPLOITATION OF NATIONAL PUBLIC LANDS SOLELY FOR THE BENEFIT OF IDAHO

I oppose logging and roads in backcountry. This plan [Idaho Roadless Rule] tears up national land that national taxpayers own, not just Idaho citizens. This is a criminal act by one state of land that is nationally owned by folks in 50 states.

This [Idaho Roadless areas] should be managed for the entire national public and they should be aware of these secret plans, not just one state consulted.

I don't believe Idaho deserves to take this area into its own economic profiteering function and shut out the fact that national taxpayers from 50 states own this land. This is a taking from them and this plan does not sit with them. No divestiture for Idaho profiteering please. (Individual, Florham Park, NJ - #214.15.10110.060)

No new roads are "needed." Especially not through Federal land. Again, Idaho has State land and private land—use that. No more tree cutting on Federal land owned by national taxpayers is "needed." Let Idaho use its State land and private land in Idaho. (Individual, Florham Park, NJ - #275.3.10110.830)

BECAUSE THE IDAHO ROADLESS RULE ENCOURAGES SHORT-TERM FIXES FOR LONG-TERM ECONOMIC PROBLEMS

Federal Register, pp. 1149, Table 1.-Summary of Net Benefits of the Proposed Rule and Alternatives; Timber Program predicts a potential loss in net revenue for the Idaho Panhandle, Clearwater, and Nez Perce NFs [National Forests], relative to existing plans. (8) states, "Reductions from high/very high to moderate scenic integrity. (9) 25% or more tree mortality can be expected over the next 15 years." Timber harvest in these areas is a short-term fix for a long-term economic problem. Trees don't grow fast enough to supply the insatiable need. Therefore, I see only further degradation and absolutely no environmental benefit of the proposed Rule. (Individual, #1475.12.20000.200)

BECAUSE THE IDAHO ROADLESS RULE WILL HARM TOURISM, THE LOGGING INDUSTRY, AND IDAHO'S ECONOMY

The [20]07 Roadless Initiative would harm the tourist industry; would kill the logging industry, a renewable resource; and harm Idaho's economy. (Individual, #274.3.20000.800)

BECAUSE THE IDAHO ROADLESS RULE WILL BE MONETARILY AND ENVIRONMENTALLY COSTLY

The time and taxpayers dollars that will be spent on this complicated State-regulated plan for our national public lands do not make sense, monetarily or environmentally. (Individual, #617.1.20000.800)

Our members include many who use, enjoy, and treasure National Forest Roadless Areas in their undeveloped state and have long advocated that these areas be spared development. These lands have become more scarce, and the costs—economic, societal, environmental—of developing them have become increasingly steep and obvious in recent years. We oppose the proposal to reject the Roadless Rule in Idaho and substitute it with an individual State rule. (Organization, #1824.1.20000.2)

TO PROTECT ROADLESS AREAS FOR FUTURE GENERATIONS

Idaho citizens are benefiting and will continue to benefit from their greatest resource: wilderness. This rule change will lessen this resource for future generations and benefit a select few. It is bad for Idaho, and it is bad for the United States. (Individual, #64.7.20000.800)

My own daughters are 9 and 7 years old. I hope to show them the backcountry of Iowa's National Forest lands when they're in high school - and I hope there will be something left for them to experience with their children. (Individual, #257.3.20000.740)

BECAUSE IT IS HYPOCRITICAL TO ENCOURAGE PRESERVATION OF INTERNATIONAL ECOSYSTEMS WHILE DESTROYING OUR OWN

At the same time that we are touting save the rain forest and other international ecosystems we are contemplating wrecking our own, this is a typical hypocritical move on the part of the United States Government. We should be ashamed of ourselves for even considering this! (Individual, #800.2.10440.750)

We cannot keep dictating that other countries preserve their old-growth forests while we allow big business to destroy our forests. (Individual, #1347.5.40000.750)

Opposition to the Idaho Roadless Rule: Concerns about Extractive Uses

2-12 Public Concern: The Forest Service should not proceed with the Idaho Roadless Rule.

BECAUSE THE IDAHO ROADLESS RULE WILL OPEN UP AREAS IN SOUTHEAST IDAHO TO LOGGING AND MINING

The Idaho State Roadless Petition and subsequent DEIS make it clear to the citizens, especially of southeast Idaho, that those in the State capital and the Federal land managers do not value roadless lands of southeast Idaho nearly as much as we do.

Rather it should be said that they value these roadless lands in southeast Idaho for mining and logging as opposed to the pristine recreation opportunities, wildlife habitat, and clean water our Roadless Areas here in southeast Idaho provide. (Preservation/Conservation, Idaho Falls, ID - #9203.1.20000.002)

BECAUSE THE ENVIRONMENTAL EFFECTS OF EXTRACTIVE USES WILL RESULT IN SIGNIFICANT SOCIAL AND ECONOMIC COSTS

Please reconsider the effects of such a decision. I understand the needs for employment and creating a better economy for your towns, but the long-term effects will be harmful, destructive, and expensive. Allowing mining, oil drilling, logging and development will create air, water, and land pollution, which in turn harms the health of your residents, thus raising health care costs. Ranchers will soon lose healthy feeding grounds for their livestock, thus raising the cost of food. The jobs that these industries propose to bring into your towns are not guaranteed since they are primed for experienced people open to relocation. These companies will not spend the money to "train" people for their industry. And lastly, bringing in these industries will disrupt the natural habitats of many animals who will only end up wandering into your towns in larger levels and causing more expense in relocation efforts. (Individual, #1279.3.20000.890)

BECAUSE EXTRACTIVE INDUSTRIES CAUSE ENVIRONMENTAL DAMAGE

I do not support the proposed Idaho Roadless Rule, for many reasons, among them the following: Jobs provide work but also toxic conditions, like water polluted by selenium from the Simplot Smoky Canyon Mine, are not the answer, leaving locals to choose between "health and wealth." (Individual, #1332.2.20000.500)

BECAUSE RESOURCE EXTRACTION INDUSTRIES CAUSE SIGNIFICANT ENVIRONMENTAL DAMAGE FOR NO REAL ECONOMIC BENEFIT

Most of the rivers near urban and industrial areas are swimming in poisons. Some have improved dramatically, but still have a long way to go before they can be considered healthy. Mining in Colorado and Montana has tainted much of the surrounding water with copper, acids, and other metals that leach from old mines and tailings that have been left by the companies that pulled out when the profit was gone. That water flows downstream and into groundwater to contaminate ever more water sources. Silt that has washed down hillsides from clear cuts and abandoned logging roads choke streams and rivers, so that they no longer provide abundant spawning beds for salmon and other fish. All of the extraction industries clamor for more land to exploit, in the name of profit for themselves and income for various local government entities. The local public would not be so eager to allow the destruction of their finite natural resources if they weren't enticed with the promise of short term funding of schools and other necessities. They need to derive funding for their schools, etc. from environmentally sustainable industry. The timber companies claim that their forestry plans are based on sustainable resource harvesting. If that were true, they would not need to log old growth forests in the national parks and National Forests. Nor would they need the Forest Service to build new roads into wilderness at the taxpayers' expense. They can't even maintain the existing roads that are still in use. Everyone now recognizes the folly of the early Americans' farming methods in the tobacco industry. Why can't we see that present day extraction industries are following the same flawed ideology? I pray that those responsible for the decision on the Roadless Rule question do not elect to weaken it and restart the irreversible degradation of our wilderness and natural resources. (Individual, #904.1.20000.2)

BECAUSE THE IDAHO ROADLESS RULE PLACES THE NEEDS OF EXTRACTIVE INDUSTRIES ABOVE THE PUBLIC GOOD

The Roadless Area Conservation-Idaho rule that has been proposed by the U.S. Forest Service is simply an attempt to erode the natural resources on our public lands through road construction, timber sales, and the opening up of U.S. Forest lands for phosphate mining. These changes would benefit a few and not the public in general. To me, the proposed Rule is unacceptable. (Individual, #619.2.20000.57)

I recently learned of attempts of the Bush administration to change the Roadless Rule to allow private industry to use public land for more mining and logging in the wilderness areas of Idaho. I am opposed to these changes that endanger our remaining public wilderness areas by selling these resources for the profit of a few companies. (Individual, #838.1.20000.57)

BECAUSE THE IDAHO ROADLESS RULE WILL ALLOW PHOSPHATE MINING

I object to the proposed Rule that allows the phosphate mining industry to receive unfiltered license to exploit our public lands. This is a blatant political handout that gives special treatment to a particular large business interest at the expense of the general public interest. (Individual, #954.1.20000.840)

BECAUSE THE IDAHO ROADLESS RULE WILL OPEN ADDITIONAL ACRES TO PHOSPHATE MINING

The Phosphate Mining Exemption of the proposed Rule breaks the premise of the Idaho Rule by eliminating existing rights of millions of Americans, other businesses, and industries. The new rule will open additional acreage for phosphate mining to occur and take away the rights of those who currently visit those protected acres. Additional phosphate mining will increase selenium pollution, destroy pristine wild areas, and place wildlife, livestock, and humans at greater risk of environmental harm. (Individual, #1200.3.20000.423)

**BECAUSE ROADLESS AREAS SHOULD NOT BE OPENED TO MINERAL EXTRACTION
AND THE ASSOCIATED ROAD CONSTRUCTION**

Road building should not be allowed for common mineral materials. The Idaho rule allows unlimited road building by this statement, "However, under the proposed [sections] 294.23(b)(1)(vii), the Forest Service would be allowed to build roads associated with the sale or administrative use of common variety mineral materials in areas designated as backcountry "if the use of these mineral materials is incidental to an activity otherwise allowed under the rule" [sections] 294.24(e)." This opens the door to road building in 5,246,100 acres for minerals, over 56% of the designated Roadless Areas in Idaho! Totally unacceptable to leave this decision in the hands of the Forest Service or any other agency.

The Idaho rule is designed to allow unlimited mineral extraction throughout the present Roadless Areas as seen in the rules statement, "Using the management spectrum associated with the proposed themes, the Forest Service and the State are seeking a balance between the protection of roadless values and the responsible development of mineral resources." (Individual, #308.8.64100.400)

BECAUSE THE RISK TO LIVESTOCK FROM SELENIUM POISONING IS TOO GREAT

My great-great grandfather and his sons started ranches in Montana and Idaho after the Civil War. Although, I have no ownership interest in them, I hate seeing your policy ruin my ancestor's legacy. I've experienced selenium poisoning first hand in a favorite mare. It occurred from feeding oats grown on selenium rich soil. It was a painful death of a beautiful mare. I just don't understand why you want to risk doing this. This does not reflect well on Republicans. It makes us look like we just don't care about the land of which god allowed us to be stewards. (Individual, #1006.1.20000.420)

**BECAUSE THE RATIONALE THAT MILLIONS OF ACRES NEED TO BE HARVESTED
TO REDUCE FIRE DANGER IS NOT CREDIBLE**

I urge you to reconsider your plan to allow logging and/or road building in National Forests. I understand that the proponents of the plan maintain that millions of acres need to be logged to reduce fire danger to Idaho towns. However almost none of this land is close enough to communities to pose a credible threat. (Individual, #1327.1.20000.260)

TO PROTECT ROADLESS AREAS FROM TIMBER HARVESTING AND MINING

This [state] petition has allowed the U.S. Forest Service to initiate an Environmental Impact Statement (EIS), called the Roadless Area Conservation Draft EIS, which will, inevitably, lead to a decision to log and mine the majority of the remaining Roadless Wildlife Habitat Areas in Idaho. Not surprisingly, the Administration's plan would impact over two-thirds of the remaining 9.3 million acres of pristine Roadless Wildlife Habitat Areas in Idaho, severely reducing its value for wildlife. (Individual, #18.2.20000.350)

BECAUSE TOO MUCH TIMBER HARVESTING ALREADY HAS OCCURRED

We want to voice our opposition for President Bush's plans to open lands to mining & logging. Those lands belong to all Americans and should be left natural as already designated. Too much has already been destroyed. Can we afford to destroy any more trees? They play a vital role in producing oxygen, which we can't live without, and providing for wildlife. It is so sad to see how greed has replaced common sense and fairness. (Individual, #1045.1.20000.2)

TO PRESERVE IDAHO TIMBERLANDS

Roadless review committee: I would like to go on record as a citizen against any changes in the Idaho roadless rules. Please note that this is a critical time in history where we can keep a precious resource (our timberlands) in a condition that has no rival in the U.S. Please help keep the roadless rules in place. (Individual, #50.1.20000.261)

**BECAUSE THE IDAHO ROADLESS RULE ALLOWS UNLIMITED TIMBER HARVESTING,
WHICH INCREASES WILDFIRE RISKS**

Idaho's rule claims to protect communities, water supplies, endangered species, and ecosystem components by "conducting activities that maintain forest health" by invoking the Bush's Healthy Forest Restoration Act (HFRA). Again, this is political speak to allow unlimited logging in Roadless Areas. There's no mention that historical logging practices are a large part of the fire problem. After logging,

the area slowly comes back, but along with the trees come weeds, heavy brush and thick, uncontrolled stands. These areas are where fire is the worst, not in thick timber, alpine areas, and old growth. (Individual, #308.4.42000.720)

BECAUSE THE IDAHO ROADLESS RULE WILL RESULT IN ACCELERATED DEVELOPMENT

Taking Idaho's National Forests, dividing it into "4 Management Themes" and placing their de facto management into the hands of county commissioners will only set us on a slippery slope, allowing for an acceleration of development with far reaching negative consequences. (Individual, #1460.9.23100.30)

Opposition to the Idaho Roadless Rule: Roads

2-13 Public Concern: The Forest Service should not proceed with the Idaho Roadless Rule.

BECAUSE THE IDAHO ROADLESS RULE DOES NOT ADDRESS NATIONAL INTERESTS OR CONSIDER IMPACTS WITHIN THE CONTEXT OF THE NATIONAL ROADLESS SYSTEM

Given the perspective of other parallel rulemakings and legal processes in other states such as Colorado, Alaska, and California combined with the fact that the Idaho rule does not make the continued preservation of Idaho's Roadless Areas its main focus leads GYC [Greater Yellowstone Coalition] to conclude that in actuality the Idaho Rule is far too narrowly focused to properly address the national significance of maintaining roadless characteristics. The 2001 Rule was promulgated after years of debate and analysis that concluded a national rule was necessary to address the national interest. A misleading and false claim should not be made that this Idaho Rule attempts to address the national interest when it does not even attempt to consider the effects of the rule in context of the entire national roadless system. (Organization, #1649.116.20000.123)

BECAUSE ROADS EXACERBATE WILDFIRE RISK

I am writing this letter to ask the Forest Service not to weaken the protections afforded by the roadless rule in Idaho. I am a PhD candidate in forest ecology at the University of California Berkeley. I beseech the commission to maintain present levels of protection for the following reasons: Roads allow brush to build up and dry out exacerbating wildfire risk, and they do not serve as a firebreak, contrary to the common misconception. (Individual, #64.4.20000.260)

BECAUSE ROADS CAUSE INCREASED EROSION

I am writing this letter to ask the Forest Service not to weaken the protections afforded by the roadless rule in Idaho. I am a PhD candidate in forest ecology at the University of California Berkeley. I beseech the commission to maintain present levels of protection for the following reasons: Roads are erosion corridors. (Individual, #64.2.20000.230)

BECAUSE ROADS PROVIDE Footholds FOR INVASIVE SPECIES

I am writing this letter to ask the Forest Service not to weaken the protections afforded by the roadless rule in Idaho. I am a PhD candidate in forest ecology at the University of California Berkeley. I beseech the commission to maintain present levels of protection for the following reasons: Roads provide footholds for invasive species. (Individual, #64.3.20000.350)

General Concerns Regarding the Proposed Rule

2-14 Public Concern: The Forest Service should avoid creating more restrictive management proscriptions.

BECAUSE SUCH RESTRICTIONS ARE NOT NECESSARY

The Idaho backcountry has done a good job of protecting itself over the last 200 years. Because of its remoteness, steep terrain, and harsh climates it has warded off attempts at habitation by people, and will continue doing so in the future. This "back door" approach to creating a pseudo "wilderness area" is unacceptable. At the meeting in Grangeville on January 30th, the men giving the presentation repeatedly

used the phrases “in my opinion” or “in our opinion” and “in my judgment.” Everyone has opinions, both good and bad. Just because one group gathers more supporters that have the same opinion does not mean that their opinions are the correct way to regulate public lands. To permanently prohibit all undesirable activities (in their opinions) seems to be a little shortsighted. No person is allowed [to] randomly build roads or harvest timber or mine for minerals without permission from the current management system. Why not let it do its job. We have enough lands with permanent bans on legitimate activities. We do not need more. (Individual, Grangeville, ID - #228.1.40000.050)

2-15 Public Concern: The Forest Service should acknowledge that the Idaho Roadless Rule offers less protection.

BECAUSE THE DOCUMENT CLAIMS MORE PROTECTION WHEN FOR HUNDREDS OF THOUSANDS OF ACRES THERE WILL BE LESS

The Idaho Roadless Plan is misleading everyone on both sides of the issue. Coming out one side of your document is “more protection” when in fact for hundreds of thousands of acres the protection is less. Be up front and honest. (Individual, #229.1.21000.720)

The introduction [Idaho’s Rule] claims Idaho is “requesting regulatory protections and certain management flexibility for the approximately 9.3 million acres of NFS [National Forest System] inventoried roadless areas in Idaho.” This is politically correct language basically saying the politicians in Idaho want to have their own say as to whether Roadless Areas should be restricted from logging and mining. “Certain management flexibility” allows the state to design rules to allow what roadless areas seek to protect—natural resource extraction and environmental damage due to industry. (Individual, #308.3.21000.720)

2-16 Public Concern: The Forest Service should not reduce protections for Roadless Areas.

We do not support removing any Roadless Areas from Roadless designation as stipulated in the Idaho Rule, nor do we support reducing protection of Roadless Areas by changing their management designation to allow any type of degradation. For example, with directional drilling techniques, areas grandfathered in under the 2001 Rule could have extraction of some resources while maintaining roadless conditions on the surface area. There is no reason to remove these areas from Roadless designation. (Preservation/Conservation, #1491.3.62000.200)

BECAUSE MANY GROUPS HAVE WORKED TO DEVELOP PLANS THAT PROTECT FOREST HEALTH AND COMMUNITY SAFETY

Many groups have worked with stakeholders and the Forest Service to develop forest management plans with the flexibility to manage forest health issues as they arise, protect homes and communities from wildfire, and provide opportunities for industry while creating strong protections for these special places. We don't need to open the door to special interests by rolling back these protections for Idaho's backcountry. (Individual, #176.2.10420.160)

Support for and Opposition to the 2001 Roadless Rule

Support for the 2001 Roadless Rule: Process and Legal Concerns

2-17 Public Concern: The Forest Service should uphold the 2001 Roadless Rule.

Earthjustice believes that the exploitation of our nation’s magnificent roadless heritage in Idaho or anywhere else is an unacceptable step backwards. We urge you to fully protect all of Idaho’s Roadless Areas in accordance with the Roadless Areas Conservation Rule and to apply these protections to all Roadless Areas on all National Forests across the country. (Individual, #218.73.20000.200)

Any person or organization attempting to disrupt this policy [2001 Rule] should be held criminally accountable and prosecuted for the destruction of property belonging to the citizens of the country as a whole. (Individual, Elkhorn, WI - #4682.2.20000.700)

TO AVOID OPENING A NEW ROUND OF PROTRACTED LITIGATION

The Roadless Rule was adopted to bring some predictability to the fate of the nation's undeveloped forest lands, and to extract the Forest Service from the controversy that inevitably attends their development. Now, as the litigation arising out of the 2001 decision is far along and we are approaching this desired stability, it is exactly the wrong time to restart the clock, reopen the controversy, and signal to the world that management of IRAs [Inventoried Roadless Areas] is still undecided. In sum, for the reasons articulated above, we request that you drop this proposal, defend the Roadless Rule, as written, in court, and apply it to the maximum extent you can consistent with existing judicial rulings. (Organization, #1824.29.20000.100)

BECAUSE THE IDAHO ROADLESS RULE CREATES CONFUSION THAT WAS RESOLVED BY THE 2001 RULE

In listening to things tonight, bringing in a lot of things I've heard and just to give some guidance as we move forward, we've heard terms like "wildland," "primitive," "back country," "general forest," "stewardship logging." We use words like wilderness values, WUI [Wildland-Urban Interface]. You know, we have the NFMA [National Forest Management Act] regulations. We heard the governor say "re-wordsmithing." He said there's concern with the Forest Service language. I look at this as far as a policy wonk, and I'm sure to a lot of people it's confusion. And it's an example of this kind of confusion out in the policy world that has led to discretion on the ground and lack of clear language, and the true people on the ground don't know where to go. I mean, what's happening with the Idaho petition here, it's creating essentially five new management categories that don't exist in the Forest Service manual. It doesn't exist in NFMA regulations.... I know the gentlemen up there all know what this is, but to the general public no one knows what it is. As a result of all these different language differences, the confusion within the handbook with what's in legislation, that really resulted after 30 years of age in some kind of national guidance, which resulted in the roadless rule. Here with the petitions being submitted with Idaho and now potentially Colorado, what is opening is, we have the potential to create 38 different roadless rules in 38 states that contain inventor[ied] Roadless Areas. And that's exactly what the last Forest Service Chief Dombeck tried to do, beginning back in 1996, end the 30 year debate. And I see you're moving forward that this petition would create even more confusion amongst the policy wonks, amongst Forest Service personnel on the ground, and between all the policies that the Forest Service has worked so hard to put together.

So I am in favor of national standards and guidelines. I think just as the governor said today, and we're moving forward with the RACNAC [Roadless Area Conservation National Advisory Committee] this week, I think everyone who's really writing this language, the language is important. I agree with everything that's been said here today, and I've been to wilderness areas all around the country as well, and they're beautiful, and I agree with that. But this language is actually really important because it comes down to, this is what is going to guide the decisions to the good guys in the Forest Service that are working on the ground. Right now all I see is confusion. I can't even make sense of all of this. So I just want people to take that into consideration as we move forward. In the end I do believe there should be some kind of national guidance and regulations for Roadless Areas, and I do believe the Roadless Rule set those guidelines and regulations, provided a clear plan, and allowed for all the exceptions necessary for multiple-use management under the Forest Service regulations as they exist now. (Individual, #218.108-109.21000.160)

BECAUSE PUBLIC LANDS SHOULD BE MANAGED IN ACCORDANCE WITH THE PUBLIC WILL

Along with the majority of Americans, I believe that all of Idaho's Roadless Areas should be fully protected in accordance with the Roadless Area Conservation Rule and that these same protections be afforded to all Roadless Areas on all National Forests. These are public lands and should be managed in accordance with the public will. (Individual, #1.3.20000.60)

I believe that all National Forest Roadless Areas, throughout the nation should be managed in accordance with the 2001 Roadless Area Conservation Rule. Until such a time as the administration reverses its course and decides to grant to the public its repeated calls for the protection of these irreplaceable public resources, we ask that you take [our] comments into account in the promulgation of this state-specific rulemaking. (Individual, #3.1.20000.60)

BECAUSE THE PUBLIC OVERWHELMINGLY SUPPORTS THE 2001 RULE

Time and time again, the American public has spoken out in favor of Roadless Area protection. The 2001 Roadless Area Conservation Rule is among the most important conservation measures ever enacted, and over a million Americans have spoken out in favor of Roadless Area protection. The Idaho state petition regarding the future management of these lands turns its back on this public demand. I urge you to reject the provisions of the Idaho state petition that weakens protections for roadless lands, and instead to maintain the current protections of the 2001 Roadless Area Conservation Rule. (Individual, #238.9.20000.60)

The 2001 Roadless Rule was crafted over an approximately three year period of time, was discussed at approximately 600 public forums, and received approximately 1,500,000+ comments. In the development of the 2001 Roadless Rule a vast array of concerns and objectives were raised by the citizens of America. All of these citizens have an equal say in how our National Forests are managed, not just those who reside within a particular state. These special areas are part of the legacy of this generation to the next generations. (Individual, #952.1.20000.2)

Your depiction that Roadless Area management is characterized by two major viewpoints is not an accurate characterization. There is only one valid, major point of view: management of a national resource with a national perspective. The overwhelming response to the Clinton 2001 Roadless Rule was for a national viewpoint and strong protection for the Roadless Areas. (Individual, #268.19.10110.60)

There is overwhelming public support for the 2001 Roadless Rule to protect all National Forest Roadless Areas nationwide: The owners of our National Forests--the American people--have commented repeatedly and overwhelmingly in support of the 2001 Roadless Area Conservation Rule ("Roadless Rule") for its uniform protections for our Inventoried Roadless Areas nationwide, including Idaho. Our members, residents of Idaho, and the public are deeply concerned about the management of National Forests and oppose the damage and irretrievable loss that come with developing these remaining pristine areas. This is not a matter of how much attention to pay the uninformed opinion of the populace at large on a matter of Agency expertise. Rather, what is at stake is how a public agency shall use public funds to manage public lands. (Organization, #1824.2.20000.127)

Over the past several years, you have received correspondence from our respective organizations [Pew Environment Group, The Wilderness Society, Earthjustice, Clean Water Action, Environment America, Greenpeace, Defenders of Wildlife, National Wildlife Federation, League of Conservation Voters, Natural Resources Defense Council, Sierra Club], on behalf of the millions of individuals whom we represent, urging the administration to abandon its efforts to repeal or weaken the 2001 Roadless Area Conservation Rule. We write again to express our grave concerns with proposed Rulemaking that would remove current protections afforded to National Forest Roadless Areas under the roadless rule. Recent actions by the administration now threaten pristine forest lands of the National Forest System in Idaho, Colorado, and Alaska. The administration has initiated a national rulemaking that will decide the fate of more than 9.3 million acres of Roadless Areas in Idaho's National Forests, including part of the Greater Yellowstone Ecosystem. (Organization, #2361.1.20000.200)

BECAUSE THE MAJORITY SUPPORT THE 2001 RULE AND THE PUBLIC INVOLVEMENT PROCESS FOR THE IDAHO ROADLESS RULE WAS BIASED AND POSSIBLY ILLEGAL

The 2001 Rule was overwhelmingly favored by the national will. The 2001 Rule process was scoped nationally-which included the State of Idaho. Idaho citizens and local perspectives were considered in

the process. The majority of the Idaho citizens favored the 2001 Roadless Rule. Your public involvement for the Idaho Petition Process did not properly scope the roadless issue regionally or nationally. Your consideration of public input during this process was flagrantly biased-if not illegal. (Recreation/Conservation Organization, Boise, ID - #1723.66.20000.060)

BECAUSE ROADLESS AREAS BELONG TO ALL AMERICANS

I hope that you will use your influence with other governors to convince them to support a cohesive and consistent policy of protecting all 58 million acres protected by the original rule. This land is our legacy; it belongs to all of the people, and it must be preserved. Idaho, under your leadership, can lead the way. (Individual, #161.2.20000.60)

BECAUSE MANY GROUPS IN IDAHO SUPPORT THE 2001 RULE

Please don't ruin Idaho. Keep it simple and return the 2001 [rule] that was agreed to and supported by so many various groups in Idaho. Remember, it was "final" until the Bush administration stuck their noses in our business and stirred up so much hate and discontent. (Individual, #81.3.20000.21)

BECAUSE NATIONAL FORESTS BELONG TO ALL AMERICANS

My family and I support the Roadless Rule laws that were passed in the Clinton administration. We believe that Federal lands are subject to Federal laws and should supersede state's rights. Federal lands belong to all Americans, not just to the residents of the states where they are located. (Individual, #1106.1.20000.123)

BECAUSE THE 2001 RULE IS MORE ALIGNED WITH THE AGENCY'S MISSION

I wanted to start out by talking about how much Americans love the Forest Service. This is something that I've encountered all across the country, and I think it wouldn't be too far of a venture to say that it's probably the only federal agency that you can say that people all around the country just love that Agency. And I think the reason people love the Forest Service is because they love their National Forests really deeply, whether they go there to hike, fish, camp, swim or whether it's just because they see them as these protected green areas on the map. And the reason I bring that up is because that's how I've always felt about the Forest Service, and I had always dreamed of working for the Forest Service, and got that opportunity two years after I graduated college where I worked as a wilderness ranger on the Mt. Hood National Forest in Oregon. And I remember one day particularly when I was going through fire training, and it was in this junior high school, and I was sitting at this tiny little desk in the junior high school studying convection currents for fires, and I was thinking about the me that used to sit at that desk and how proud I would have been then if I knew that when I grew up I was going to be a forest ranger and a fireman. It was just a really great feeling. Two weeks after that, I was out in the old growth on the Salmon Huckleberry Wilderness, and I was hiking through the most lush, incredibly most alive place I've ever been in my life, and I was doing a loop hike. And I came out of there into a clear-cut. It had been the ancient forest [and] had been clear-cut right to the boundary of the wilderness area. I was completely outraged, and I wanted to find out who did it. I went back to the Forest Service headquarters and went through the files and talked to people and then found out that it had actually been permitted by the Agency whose uniform I was wearing. And this is an Agency that was telling me to go out and talk to people about why they shouldn't wash their dishes in the stream because it was bad for the environment. And they were telling me that clear cutting old growth forest, removing every single tree, had no significant impact on the environment. And then I became ashamed of working for that Agency. And I had some big arguments with my supervisors. They told me I should either change my attitude or be fired. And I didn't, and I was. And since then for the past decade and a half I've been working really hard to try to make the Forest Service an agency that I would be proud to work for again. And I remember when Mike Dombeck, chief of the Forest Service, announced the Roadless Rule, how happy I was that day that this Agency had become one that lived up to the dreams and expectations that people all around the country have for this Agency. And it saddens me to be here again with the threat of those rules and those protections for our last intact forest being open again. And Lieutenant Governor Risch said that he was hopeful about getting past this problem we're having with wordsmithing. And I'd like to be that optimistic, but we're talking about whether or not to build roads, mine, and log in over 6 million acres of pristine wildlands. And that seems like more than just a wordsmithing question. This is a big issue, and I hope and I pray that we can get past that, and I hope we can meet the expectations that

he's laid out here which are the expectations that I have in my heart; because I would like to see the Agency make the right choice and become an agency that I would be proud to work for, an agency that all of you who are still there and stuck it out -- because I know I wasn't alone. I know most of the people who work for the Agency joined for the same reason I did, which is because they cared about these places. And I hope the Agency makes the right choice, becomes once again an agency that I'd be proud to work for and, more importantly, an agency that you can be proud to work for, an agency that lives up to its lofty goal of caring for the land and serving people. (Individual, #218.55-57.10440.23)

TO PROHIBIT NEW MINING LEASES

The Federal Register, pp. 1143 states "Phosphate mining activity on existing leases will be similar across the alternatives over the next 15 years. However, 12,000 acres of unleased known phosphate reserves within Idaho Roadless Areas will be made available for future leasing or lease expansion under the proposed rule that would not be accessible under the 2001 rule. Mining in these areas could generate an estimated 545 million tons of phosphate ore, but development of these areas is expected to occur over an extended period (50+ years). All unleased areas with known phosphate reserves (approximately 13,400 acres: estimated 603 million tons) will be available for leasing over an extended period under existing plans." It further states, "Foreseeable reductions in scenic integrity from high to low levels from long-term development (50+ years) of unleased phosphate reserves are similar for the proposed rule (12,100 acres) and existing plans (13,400 acres) and confined to the Caribou Targhee National Forest. Reductions in scenic integrity associated with development of existing phosphate leases are similar across the three alternatives. . . but the changes in activities permitted within Idaho Roadless Areas under the proposed rule have the potential to affect the degree to which Idaho Roadless Areas are considered for future wilderness designation. Reductions in wilderness characteristics are most likely to occur in areas assigned to the GFRG [[General Forest, Rangeland, and Grassland]] [[management]] theme (1.262 million acres under the proposed rule.)" "Losses in dispersed recreation associated with development of existing phosphate leases are equal for all alternatives: development of future leases will affect opportunities but not within 15 years (that is >50 years)." This is simply intolerable! Future leases are not possible under the 2001 Rule, which obviously was written to protect [Roadless Areas] from phosphate mining, logging, etc. Therefore, I adamantly oppose allowing additional leases and incursion by these industrial giants into the Roadless Areas. It is clear that the additional proposed 12,100 acres above those currently existing under lease will never appease the insatiable monetary appetite of the mining companies, the local communities, the State, or the Nation. There will be no end to the destruction. It is time to defend these areas, permanently deny further access, and reinstate the 2001 Roadless Rule. (Individual, #1475.9-10.20000.423)

Support for the 2001 Roadless Rule: Environmental Concerns

2-18 Public Concern: The Forest Service should uphold the 2001 Roadless Rule.

TO ENSURE PROTECTIONS FOR ROADLESS AREAS

I am writing this letter to ask the Forest Service not to weaken the protections afforded by the roadless rule in Idaho. I am a PhD candidate in forest ecology at the University of California Berkeley. I beseech the commission to maintain present levels of protection for the following reasons: These areas were set aside with a specific purpose: preservation. This proposed Rule change represents the antithesis of the roadless rule: exploitation. (Individual, #64.6.20000.200)

We [the Southern Environmental Law Center] vehemently oppose the current proposal to eliminate the 2001 Roadless Area Conservation Rule in Idaho and replace it with a state rule that would fail to protect Idaho's remaining Roadless Areas. (Organization, #1803.1.20000.200)

It is clear from the proposed Rule that only a fraction of the 9.3 million acres in Idaho that are currently protected under the Clinton rule would remain roadless under the new, toothless, state-supported one. Please obey the law and the wishes of the American people as expressed profusely during the comment

period for the original Roadless Rule and leave these areas as a legacy for all Americans in their pristine state. (Individual, #70.4.20000.100)

**TO PROTECT THE TONGASS, THE GREATER YELLOWSTONE ECOSYSTEM,
AND MUCH OF THE ROCKY MOUNTAINS**

Please do not change the 2001 Roadless Area Conservation Rule in any way, except to strengthen it. This Rule is the only thing that prevents irreversible harm to the Tongass, the Greater Yellowstone Ecosystem and much of the Rocky Mountains. Our survival as a species may depend on the biodiversity protected in these areas. (Individual, Madison, WI - #4686.1.20000.310)

BECAUSE ROADS HAVE SIGNIFICANT ADVERSE EFFECTS

I have seen firsthand how damaging roads can be through our natural lands. They don't just effect the few feet of the roadway-their impacts are multiplied by fragmenting habitat, disrupting wildlife movement and breeding and adding all of the other impacts of increased, incompatible use such as noise, trash, fire, and air pollution. Idaho's roadless backcountry is priceless. I implore you to maintain Roadless Area protections for all of Idaho's National Forest Roadless Areas. Please keep these areas fully protected through strong provisions in the Roadless Area Conservation Rule. (Individual, #141.1.64100.330)

Roads are the gateways to civilization. First a road, later a campground, then a convenience store, gas station etc. Remote campgrounds with road access are always littered with beer cans, rifle shells, and all sorts of trash. Unfortunately, when you make access to a place easy, you make fouling it up easy. Please let's don't start that chain of events. The Roadless Areas are special because there are so very few of them left. Please keep the Roadless Rule intact. (Individual, Abilene, TX - #8826.1.20000.680)

TO PREVENT THE SPREAD OF WEEDS AND PESTS

Roadless Areas serve as barriers against the spread of weeds and pests into pristine areas. The potential for spread of non-native noxious weeds is unlikely under the 2001 Roadless Rule; however, the spread of noxious weeds (one of the four main threats to the National Forest System, according to former Chief Dale Bosworth) would increase in over 600,000 acres under the proposed Idaho Roadless Rule. These are concerns of many members of the scientific community, and illustrate the necessity for strong and explicit protections against road building in these areas. (Preservation/Conservation, Spokane, WA - #1799.17.20000.335)

**TO PRESERVE NATIONAL WILDLANDS FROM LOSSES CAUSED
BY INCREMENTAL DECISION MAKING**

The rule [2001 Roadless Rule] sprang from two central realizations. First, the National Forest system represents the collective resource of the public at large, all states, all communities, all people. Second, management based principally on a local idea of immediate tradeoff inevitably results in the progressive, if incremental, loss of wildlands. That happens regardless of their increasing scarcity and therefore importance on a national scale. Either you step back as the Roadless Rule did, look at the big picture, and decide enough is enough -- we no longer have Roadless Areas to give away, or bit by bit, decision by decision, exception by exception, we will lose them all. (Individual, #218.45.10110.60)

TO BE CONSISTENT WITH THE ADVICE OF THE SCIENTIFIC COMMUNITY

In 2004, when the 2001 Roadless Rule was suspended, more than 125 scientists wrote to the Administration requesting its reinstatement. According to their letter, "There is growing consensus among the scientific community that a strong Roadless Area conservation rule is one of the cornerstones to sustainable public lands management, biodiversity conservation, and ecosystem health of National Forests. Therefore, we request that you reinstate the 2001 Roadless Conservation Rule that received very thoughtful input by scientists and the public." We [Lands Council] hope that the Forest Service and the State of Idaho heed the research and advice of our nation's scientific community and manage all of Idaho's Roadless Areas under the 2001 Roadless Rule. (Preservation/Conservation, Spokane, WA - #1799.30.20000.127)

BECAUSE THE 2001 RULE IS SUPPORTED BY SCIENCE

The scientific findings indicate the need to keep the 2001 Roadless Area Conservation Rule. The July 1993 "Forest Ecosystem Management: An Ecological, Economic, and Social Assessment" is a Report of the Forest Ecosystem Management Assessment Team. The Report addressed issues associated with lands managed by the Forest Service and Bureau of Land Management within the range of the northern spotted owl. On page I-1 of the Executive Summary, the following statements are found. "The Team was comprised of scientists and technical experts of a variety of disciplines from the Forest Service, Bureau of Land Management, Environmental Protection Agency, U.S. Fish and Wildlife Service, National Park Service, National Marine Fisheries Service, and from several universities. Over 600 scientists, technicians, and support personnel contributed in some fashion to this effort." (Organization, #1694.2.20000.355)

TO PROTECT WILDLIFE SPECIES AND HABITAT

Leaving the Roadless Rule in place not only makes good fiscal sense, but it leaves wildlife habitat intact. This in turn protects our natural heritage, as well as protecting endangered species. It also helps species that are not currently at risk from becoming threatened or endangered. (Individual, #131.3.20000.2)

TO PROTECT WILDLIFE AND PLANT SPECIES

Keep current protections in place for all 9.3 million acres of Idaho's roadless lands. We are running out of trees, wildlife and places for wildlife to live. Without wildlife and wilderness for them to live in, we will also perish. We have already lost so many of our sea mammals, fish, birds, polar bears and our bee population here and worldwide and so many other animals and plants every single day. Please speak up and help try to save what is left of America's land, plants and animals from destruction. If you don't, we will end up with nothing but an uninhabitable, dead, polluted wasteland. (Individual, #97.1.40000.201)

TO REDUCE HABITAT FRAGMENTATION AND ENSURE PROTECTION FOR WILDLIFE

There was a reason some of Idaho's forests were protected by the Roadless Area Conservation Rule. Infiltration by logging and other industry will disrupt and fragment habitat for wildlife that need real wilderness to survive, not small plots within a network of human industry. (Individual, #1377.5.20000.331)

The protection of America's Roadless Areas is vital. These areas, by not being fragmented by roads and extractive activities, provide habitat for our wildlife, protect our water quality by protecting the headwaters to rivers, and provide us all with the precious sense of being able to be away from urban development. Fragmentation of wild areas is of increasing international concern because the interactions between species in an ecosystem need sufficient space to continue in a healthy manner. Once these pristine areas are damaged, it may not be possible for us to reverse that damage. We do not know enough about the balance in these ecosystems to take our chances by undoing that balance, only to find out later that the damage requires more management which may or may not be effective. Once we tamper with the balance of those species, we may not be able to save them. In 2001, the U.S. Forest Service issued the Roadless Area Conservation Rule. I write to ask that you let this policy remain in place, in Idaho, as well as in Alaska, Colorado, and throughout the nation. (Individual, Eugene, OR - #8855.3.20000.331) I am writing this letter to ask the Forest Service not to weaken the protections afforded by the roadless rule in Idaho. I am a PhD candidate in forest ecology at the University of California Berkeley. I beseech the commission to maintain present levels of protection for the following reasons: Road construction will break up large habitat patches for large mammals driving them away from the area and increasing destructive (to both parties) animal-human encounters. The internal combustion driven vehicles that will use the roads will further interfere with wildlife. (Individual, #64.1.20000.351)

TO PROTECT WILDLIFE HABITAT AND RECREATIONAL OPPORTUNITIES

Please do not override the national Roadless Rule. It was crafted to do what is best for Idahoans. Not only do fish and wildlife need these untouched areas to thrive, but wilderness ("roadless" is wilderness without the capital "W") is what gives Idaho its character as a place to hunt, fish, relax, go birding, float a wild river, take an extended backpacking trip of a lifetime, and more. (Individual, #33.1.20000.2)

TO PROTECT WATER AND FISH HABITAT

Trout Unlimited mentions that water is the most important forest product worth billions of dollars a year but still can't be measured in dollars and cents. Mature forests provide the best soils slowing runoff with the complexity of roots and cover. With little disturbance on the ground we can expect higher levels of fish production, spawning habitat, irrigation and clean streams. Global warming makes unimpaired cold water streams even more important as core areas to such species as bull trout and westslope cutthroat since warmer water temperatures dictate migration to a more suitable habitat. I propose to retain the 2001 Roadless Rule which provides adequate interim protection of the forest. (Individual, Moscow, ID - #8774.2.20000.240)

TO PROTECT THE NATIONAL FORESTS AND WILDLIFE FOR FUTURE GENERATIONS

Time and time again, the American public has spoken out in favor of Roadless Area protection. The 2001 Roadless Area Conservation Rule is among the most important conservation measures ever enacted, and over a million American's have spoken out in favor of Roadless Area protection. The Idaho state petition regarding the future management of these lands turns its back on this public demand, and on the conservation legacy of Teddy Roosevelt. A century from now, few Americans will look back on the landscape we leave behind and complain that we didn't build enough roads, or clear cut-enough land, or allow enough phosphate mining. But they will thank us for the roadless wild lands we set aside and preserve. When it comes to managing our federal forestlands, the legacy we leave for future generations is the single most important factor we should consider. Oregon Wild urges you to reject the provisions of the Idaho state petition that weakens protections for roadless lands, and instead to maintain the current protections of the 2001 Roadless Area Conservation Rule. (Organization, #582.17.20000.2)

TO PRESERVE THE WILDERNESS THAT REMAINS

I wish to see all of Idaho's land currently protected under the Roadless Area Conservation Rule continue to be protected under that rule. It is imperative that we preserve what wilderness we do have left. The reasons are many and include: The fact that Idaho's roadless backcountry makes up the core of the last intact forest ecosystem in the lower 48 states. (Individual, #113.2.20000.330)

BECAUSE OLD-GROWTH FORESTS PREVENT FLOODS

Please keep the Roadless Rule in place. Old growth forests prevent floods. (Individual, Seattle, WA - #3635.1.20000.230)

BECAUSE OF THE INCREDIBLE BEAUTY OF IDAHO'S ROADLESS AREAS

I wish to see all of Idaho's land currently protected under the Roadless Area Conservation Rule continue to be protected under that rule. It is imperative that we preserve what wilderness we do have left. The reasons are many and include: The incredible beauty of Idaho's Roadless Areas, which I had the privilege to spend 6 weeks backpacking in as part of an archaeological survey. (Individual, #113.1.20000.550)

Please keep current protections in place for all 9.3 million acres of Idaho's roadless lands!!!! I do not live in Idaho today, but I was raised in Idaho. Please don't ruin it. I travel frequently for my job, sometimes to posh places, sometimes to amazing wilderness, and sometimes to not so nice places. Every place I live, every new location I visit, I think to myself that as a child I never appreciated the beauty and pristine wilderness of Idaho enough. I can remember, as a teen, sitting on a ridge looking across to the Owyhee range, and thinking how great it is to be living in such a place. Even then, little did I know that I would move away from Idaho and never be able to replicate that moment. When I lived in Canada, on the Bay of Fundy, it was lovely and clean. But no mountains! In southern Arizona, few trees! (And soon no water.) I can remember Redfish Lake, so clear I could see rocks and trees at the bottom. Paris is lovely, of course, but there are no Sawtooths in the City of Lights, or anywhere in the world but Idaho. Up at Priest Lake there's a place we called Necco Beach because the rocks are smooth and flat, and colored just like the faded candies. But when I was in college in Brooklyn, we spent our time at a beach that inspired a paper I wrote for school, entitled "The Beach is an Ashtray." And when I swam in the water, my eyes burned. Believe me, Idaho is unique in the world. We can never replace it. I keep thinking I'll take some time off and bring my children to Idaho, and show them where I spent my

childhood. A place with untainted rivers, noble mountains, and ridges where you can still dream of a world that isn't killing itself. Governor Jim Risch presented his petition to open up areas currently protected by the Roadless Area Conservation Rule to commercial development on my birthday. I want to cry. (Individual, #9.1.20000.200)

Support for the 2001 Roadless Rule: Social and Economic Concerns

2-19 Public Concern: The Forest Service should uphold the 2001 Roadless Rule.

BECAUSE PRISTINE AREAS PROVIDE SOLACE AND INSPIRATION

The wildly popular Roadless Rule is largely supported by people like me, Americans who may not live near pristine, unroaded National Forests. We're people who seek solace and inspiration in some of the very few places humans haven't spoiled. America's wilderness distinguishes our nation from most of Europe and Asia and other places on the planet where humans have logged and paved away the last traces of wild spirit. America doesn't need any more roads in our National Forests. (Individual, #220.1.20000.770)

BECAUSE RECREATIONAL USE OF ROADLESS AREAS IS INCREASING

Please protect all Idaho Roadless Areas consistent with the 2001 Rule. I believe that weakening protections for Idaho's Roadless Areas is a huge mistake. The use of these areas by recreationists continues to rise. (Individual, Red Lodge, MT - #6201.1.20000.500)

TO PLACE LONG-TERM ENVIRONMENTAL BENEFITS ABOVE SHORT-TERM ECONOMIC GAIN

The impacts resulting from the proposed action will be driven by mining, logging, and new road construction. The "need" for this proposed action would appear to be more "transparent" (as advocated by NEPA), if it was defined as the "need" to harvest natural resources such as phosphates, timber, and other products. This "need" is being driven by the economics of today, versus the long-term benefit of protecting this country's resources for the future. As such, I challenge the "need" for the proposed action as written. The 2001 Roadless Rule provides protection for our National Forests. It provides a rich and bountiful environment for the flora and fauna. It provides 9.3 million acres of land to sustain this bounty, and to allow citizens the pleasure of its beauty. What it does not do is open the door for new mining, logging, or the construction of new roads outside of a set of controlled conditions. (Individual, #749.6.20000.57)

BECAUSE ROADLESS AREAS SHOULD NOT BE MANAGED FOR ECONOMIC BENEFIT

The Idaho proposal would give direction and control of this national land resource to the local (state) interests, and allow them to begin to manage them as commercial resources. The Idaho proposal scoping shows a favorable compromise between 'existing plans' and the 2001 Roadless Rule, but both the existing plans and the Idaho plan are based on increasing the ability of the State to accommodate commercial activities of logging, mining, and recreational development. The Idaho proposal would change the management of 'Roadless areas' from a trust to maintain an environment to management of a resource for economic benefit. I am not in favor of existing 'Forest Plans' or adopting the 'Idaho Roadless Rule.' I am in favor of the 2001 Roadless Rule. (Individual, #8.2.20000.800)

BECAUSE PRESERVING ROADLESS AREAS WILL RESULT IN SUSTAINABLE ECONOMIC GROWTH

Idaho is not supposed to be a park to play in but rather a wild place for nature to exist as it has for eternity. Actually, the special interests that want to ruin the Earth are just doing it for the sake of money. By maintaining the beauty that we have we will attract tourists and their dollars as a sustaining income rather than the short-term income these other avenues offer. Please keep Idaho wild and sustain the roadless rule that was established in the recent past rather than the shortsighted attitude of the current administration. (Individual, #130.2.10410.870)

Support for the 2001 Roadless Rule: Natural Resource Concerns

2-20 Public Concern: The Forest Service should uphold the 2001 Roadless Rule.

BECAUSE ROADLESS AREAS HAVE FEW TIMBER RESOURCES

I have always supported the original, 2001 rule for managing Roadless Areas on the National Forests. That rule correctly recognized that these areas had few timber resources and would be best left in custodial management. (Individual, #223.1.20000.830)

BECAUSE ADVERSE EFFECTS FROM EXTRACTIVE USES WILL BE SIGNIFICANT

I write also to ask that you maintain Roadless Area Conservation Rule protections for all of Idaho's National Forest Roadless Areas. The impacts of logging, road construction, mining, and other industrial development in Roadless Areas allowed by the Idaho petition will have irreversible impacts on the clean drinking water they supply, the vital habitat they provide for fish and wildlife, and the countless recreational opportunities that exist on these unspoiled, wild areas. It is important that these backcountry areas in our National Forests remain protected under the Roadless Area Conservation Rule. (Individual, #194.2.20000.2)

It is imperative that the Roadless Area Conservation Rule be adhered to. The fact that the mining and logging industries would like to see the RAC Rule dissolved just seven years after it was enacted is good evidence that it was necessary. These industries seem to feel that there is currently not enough exploitable land available. If that is true, then it is no leap of logic to assume there never will be. In light of that, it seems obvious that dissolving the RAC Rule to allow logging and mining companies access to these places would be foolish. There is little evidence to suggest that, should either of these industries be allowed into the areas in question, they would be [nothing] but brutal in their pursuit, and careless and indifferent in their departure. (Individual, #1209.1.20000.57)

BECAUSE TIMBER HARVESTING RESULTS IN SIGNIFICANT EFFECTS

Missing the trailhead to Beehive, north of Sandpoint, I once spent half a day lost in the giant trash pile that was the result of a current logging operation. It was horrendous. Because it was too difficult to slog along the muddy, rutted logging roads, we headed into what remained of the forest, but downed trees left behind made the going even worse. We eventually headed back out and slept next to our cars before finding the real trailhead the next morning. Had it been a clearcut operation, the going would have been better, but the experience infinitely sadder. And you want to turn another 6 million acres into that kind of terrain? Or worse? Believe me, the glory of Idaho isn't potatoes or the Budweiser-ad-draped silos of the farmland. It's the forests and lakes of the Panhandle. Cherish them; praise them; preserve them. Please, please maintain the Roadless Area Conservation Rule protections for all of Idaho's National Forest Roadless Areas. (Individual, #109.1.42000.550)

TO PROTECT ROADLESS AREAS FROM ROAD CONSTRUCTION

I advocate returning all roadless management practices and policies in Idaho (as well as all other existing US Roadless Areas) back to Clinton's 2001 plan. You can cook the data all you want about how beneficial building additional roads in these precious areas all you want. It is wrong. We all know this, but those who will financially benefit from road building and tree cutting will undoubtedly press on-destroying unrecoverable resources at the price of personal wealth. Decades from now, President Bush shall be remembered for his hand in allowing the destruction to occur. . . .(Individual, #68.1.20000.57)

TO PROTECT ROADLESS AREAS FROM EXTRACTIVE USES

Idaho's proposed Rule for managing National Forest Roadless Areas would allow eight times more logging than the 2001 rule; it would allow a fourfold increase in road building, an increase of 545 million tons of phosphate mining, and would open 609,500 acres to other mining, oil and gas exploration, and development. Idahoans, Oregonians, as well as all Americans, have a vested interest in protecting these lands. It is important to remember that these wild areas are not county public lands, or Idaho state public lands, but rather American public lands. They belong to all Americans, and should be managed for the long-term good of the nation. (Organization, #582.4.40000.60)

The Idaho rule would allow open-pit phosphate mining with impacts on 12,000 acres and it would allow logging almost anywhere on the pretext of “facilitating forest health.” We prefer the clear, flexible criteria in the 2001 national rule. We know the forests will not be logged off. We can’t be sure of that with this vaguely worded Idaho proposal. If the Governor of Idaho wants to propose specific areas to be developed for mining or logging, a rule for those particular sites might be considered. The open-ended approach of the Idaho proposal is unacceptable because we don’t know what it will lead to. Your environmental impact statement assumes very little impact, but under a different reading of the rule there could be more severe impacts over a much larger acreage. (Individual, #1565.2.20000.100)

TO PROTECT ROADLESS AREAS FROM TIMBER AND MINING INTERESTS

I did take the time to read the EIS in some detail. Although I have not been following the politics surrounding this issue, it is pretty clear that the State of Idaho’s “Existing Plan” is an attempt to push back the Federal “2001 Roadless Rule,” and that the newly proposed “Idaho Roadless Rule” is an attempt at compromise between the two plans. I believe the original “2001 Roadless Rule” provides the strongest protection for our public lands in Idaho. Clearly these lands are under pressure from exploitation by local commercial timber and mining interests, working through the state government to ease restrictions on public land use. I do not wish to see our Nation Forest Service become just an administrative branch for these interests. (Individual, #10.2.33000.57)

BECAUSE THE 2001 RULE PROVIDES FOR RESPONSIBLE MANAGEMENT AND ADDRESSES FOREST HEALTH CONCERNS

The existing rules already provide the flexibility to address fire risk to protect our communities. (Individual, #206.2.20000.160)

The [Idaho state] petition is too reckless when it comes to development in roadless backcountry areas. Of the 9.3 million acres of roadless wildlands currently protected in Idaho, the petition would open up 5.2 million acres to road building for “forest health” purposes. Similarly, it would allow logging on 7.6 million acres for “forest health purposes,” and it would open up an additional 609,500 acres to full development for commercial logging, roads, mining and other industrial development. The 2001 Roadless Area Conservation Rule already contains provisions that allow responsible management to address fire and forest health concerns. (Individual, #238.4.20000.2)

I have come to the conclusion and it is my clear opinion that the proposed Rule is the beginning of the end for our public lands in Idaho, as we currently know them. Frankly, the 2001 Rule, also known as the Clinton Rule, which is currently in place, affords far better protections for our public lands than the proposed Rule. The current 2001 Rule should remain in place in perpetuity. The 2001 Rule currently protects wildlife populations, preserves watersheds, and protects the wild places we in Idaho are so fortunate to have at our doorstep. It further has provisions for wild land fire management that sufficiently protect our rural communities. The proposed Rule does none of this. The proposed Rule, in fact, degrades the qualities our public lands that are so highly treasured by Idahoans and other. (Individual, #619.1.20000.100)

The 2001 protection provided healthy watersheds that supported a wide range of recreation opportunities, giving economic life to local communities. The 2008 Rule compromises these benefits. Policy changes allowing increased road building in Backcountry/ Restoration and General Forest areas to promote forest health, fire reduction, private property protection, or increased recreational access are not beneficial in the long run, nor are they needed since current Roadless rules already provide solutions to protect property or life. (Organization, #1804.4.20000.890)

BECAUSE THE 2001 RULE PROVIDES SUFFICIENT FLEXIBILITY IN ADDRESSING HAZARDOUS FUELS

You have not presented a convincing case that the IRR [Idaho Roadless Rule] is superior to the 2001 Rule and existing Forest Plans in its ability to treat hazardous fuels. The 2001 Rule still permits the treatment of hazardous fuels under certain conditions and provisions. (Individual, #268.46.20000.262)

Fuels treatment is happening all over Idaho under the 2001 Roadless Conservation Rule, and is supported by TWS [The Wilderness Society] and other conservationists. These mechanical treatments include a contract out for bid in Myrtle Creek near Bonners Ferry, past treatments around Yellow Pine, at Silver Creek near Garden Valley, and at Job Creek near Stanley. Other roadless mechanical fuels treatment projects are being prepared at Big Creek near McCall and at Salmon. There are also prescribed fire projects treating thousands of acres of Idaho roadless forests every year, allowed by the 2001 roadless rule and supported by conservationists. (Organization, #1808.3.20000.260)

BECAUSE THE 2001 RULE CONTAINS SUFFICIENT EXEMPTIONS FOR THINNING

The 2001 Roadless Rule includes sufficient exemptions to allow thinning. The existing Roadless Rule allows for the type of thinning that is most likely to produce positive results. The rule allows local officials to log and sell small trees in Roadless Areas in an effort to reduce fire risk. [Footnote 11: 36 CFR Section 294.13(b)(1). The need for and effects of such efforts are speculative, in part because unroaded areas are among the least altered - and therefore least in need of remedial thinning - landscapes and in part because both how to locate thinning projects and whether they reduce subsequent fire size and intensity are uncertain. FEIS Ch. 3 pp. 74 & 90-91.] Roads are not permitted for this purpose in part because they are associated with increased fire starts [Footnote 12: 66 Fed. Reg. 3253], disrupt ecosystem health [Footnote 13: FEIS Ch. 1, p.14], and would aggravate an enormous road maintenance backlog [Footnote 14: 66 Fed. Reg. 3245-47; FEIS Ch. 3, p. 22]. However, forest health thinning can be done and is being planned miles into Roadless Areas within the confines of the final rule, as is the case with projects such as the Clean Slate Project on the Nez Perce National Forest. [Footnote 15: Notice of Availability of EIS, 66 Fed. Reg. 16226.] (Organization, #1824.19.20000.260.)

BECAUSE THE 2001 RULE PROVIDES FOR SUFFICIENT MANAGEMENT FLEXIBILITY

Existing rules are working. Last year we approved almost 800 acres of some level of management within Idaho's Roadless Areas. It allowed the flexibility we need, and as Idaho grows we need to think ahead to guard these special places to escape the noise and crowds of everyday life. (Individual, #218.28.20000.770)

Because of the ambiguity, uncertainty, and new loopholes created by this proposal, the Wilderness Society does not support this plan. We support the protections and flexibility currently provided by the 2001 Rule, and will work to ensure that Idaho's roadless lands remain the way they are. (Individual, #218.37.20000.720)

The Roadless Rule has sufficient exemptions. The Roadless Rule reflects an extraordinary effort to accommodate development interests and allow for exigent circumstances, while ending the Roadless Area activities most harmful and controversial nationwide. In deciding what to restrict and how to restrict it, the Agency narrowly tailored the final regulation, incorporating numerous exceptions and exclusions. For example, the Roadless Rule preserves roaded access rights for inholders [Footnote 4: 66 Fed. Reg. 3253, 3255; 36 CFR section 294.12(b)(3)], miners who have a right [Footnote 5: 36 CFR section 294.12(b)(3)], and within the perimeter of existing or renewed oil and gas leases [Footnote 6: 36 CFR section 294.12(b)(7)]. Roads are also allowed where needed to address imminent threats that would, without a road, cause loss of property or life [Footnote 7: 36 CFR section 294.12(b)(1)], and roads can be reconstructed or moved to reduce documented safety problems [Footnote 8: 36 CFR Sections 294.12(b)(5)&(6)]. (Organization, #1824.14.20000.680)

This landmark conservation policy [2001 Roadless Area Conservation Rule] provides balance and accommodates necessary fuels reduction, recreation, and emergency access while prohibiting the kind of new development in the backcountry-like road construction, industrial logging, mining, and oil and gas drilling-that would destroy the unique qualities of these wild places. We ask that you abandon these processes and instead uphold and enforce the Roadless Area Conservation Rule throughout the entire National Forest System in accordance with the wishes of the American people. (Organization, #2361.7.20000.60)

**BECAUSE CONSERVATION AND RECYCLING CAN BETTER MEET THE NEEDS
THAT WOULD BE FILLED BY EXTRACTIVE INDUSTRIES**

I wish to see all of Idaho's land currently protected under the Roadless Area Conservation Rule continue to be protected under that rule. It is imperative that we preserve what wilderness we do have left. The reasons are many and include: The fact that through conservation, recycling, and other means, we can supply ourselves with much of what the corporations that want to remove this land from its roadless status are seeking. (Individual, #113.4.20000.800)

2-21 Public Concern: The Forest Service should maintain protections equivalent to the 2001 Roadless Rule.

**TO AVOID FORECLOSING TRIBAL INVOLVEMENT IN DEVELOPING LAND
AND RESOURCE MANAGEMENT PLANS**

In contrast to the [Nez Perce] Tribe's significant involvement in the development of the LRMPs [Land and Resource Management Plans] over the years, most of the Tribe's requests seeking protections in Roadless Areas within the ceded territory, which are at least as protective as the 2001 Roadless Rule and existing Forest Plans, were not adopted. These existing protections which the Tribe would like maintained to protect treaty-reserved interests would likely be considered "inconsistent" and therefore "superseded" under the Rule. Since the Rule would prohibit Forest Plan changes that are inconsistent with the Rule, the Tribe's future involvement in the development of LRMPs which seeks to augment habitat or watershed protections in areas where the Rule allows discretionary road building and timber cutting would likely be foreclosed. (Government, #1819.22.22113.40)

2-22 Public Concern: The Forest Service should not reduce protections of Roadless Areas.

TO COMPLY WITH THE FORT BRIDGER TREATY

Article IV of the Treaty [Fort Bridger Treaty of 1868] reserves the right to hunt on 'unoccupied lands of the United States', which provides for subsistence purposes. IRAs [Inventoried Roadless Areas] provide strongholds of biological diversity for native species, which supports the Tribes' subsistence rights and policy. The proposed Rule would affect Tribal [Shoshone-Bannock] rights by reducing the protections currently in place for IRAs, altering their natural condition and further diminishing biological diversity. IRAs contribute high-quality habitat, consistently yielding strong, sustainable populations of native species. Removing protection from even one IRA diminishes the ability of native species to maintain current populations and genetic diversity by further fragmenting habitat. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.34.20000.150)

2-23 Public Concern: The Forest Service should preserve existing Roadless Area protections.

TO PROTECT ROADLESS AREAS FROM THE EFFECTS OF MINING

I am writing this letter to ask the Forest Service not to weaken the protections afforded by the roadless rule in Idaho. I am a PhD candidate in forest ecology at the University of California Berkeley. I beseech the commission to maintain present levels of protection for the following reasons: Mining is a great threat to the environment. As it is now practiced (mining act of 1842) mining does not serve the members of the community economically, rather a select few reap great profits while local water supplies are threatened. Typically the US government and subsequently the taxpayer are left with millions in cleanup costs. (Individual, #64.5.20000.840)

The uncontrolled mining activities in Idaho, particularly the selenium leachate from open pit mine tailings poisoning streams and lakes, demonstrates what would happen if similar activities were to be permitted within the national parks and forests. Efforts to remediate the abuses of our environment in past years by irresponsible corporations have cost taxpayers billions of dollars, and that job is not yet done. Please do not let down the barriers that protect our public lands from the ravages of the kind we

have experienced in the past. We do not have the controls or the will to keep companies from destroying the environment in which they are permitted to operate. (Individual, #963.2.20000.420)

2-24 Public Concern: The Forest Service should avoid making an arbitrary and capricious decision with regard to repealing the 2001 Rule.

BECAUSE THE FINDINGS IN THE DEIS DO NOT SUPPORT A REPEAL

Under the Administrative Procedures Act (APA), the Forest Service must present a rational explanation for the repeal and replacement of the existing 2001 Rule. In this particular case, we [Idaho Conservation League] feel that the Forest Service is poised to reach an arbitrary and capricious conclusion with regards to the proposed repeal of the 2001 Rule and replacement with the proposed Idaho Rule.

We feel that the Forest Service offers a rationale for the proposed Idaho Rule that is contrary to the evidence before the Agency, and much of what is presented in the DEIS. We point to findings in the DEIS that Idaho Roadless Areas are important for social, economic, and ecological resources that are important to the State of Idaho and its citizens. We also point to determinations in the DEIS and supporting documents that the costs associated with ongoing road maintenance continues to rise while appropriations shrink. At the same time, deterioration of existing roads is consuming ever-larger proportions of available funding sources.

With regards to oil and gas development, some 145 test wells have been drilled in Idaho, without a single commercially-viable find. Contrary to this fact, the proposed Idaho Rule would open over 600,000 acres to oil and gas development. The DEIS finds that Idaho Roadless Areas provide “some of the best habitat and strongest populations” (DEIS, 3-218) of anadromous fish species (all listed under the ESA). Along similar lines, the DEIS finds that “the value of Idaho Roadless Areas in conserving biodiversity is likely to increase as habitat loss elsewhere increases” (DEIS, 3-217).

With regards to protecting communities and forests from fire and improving “forest health” (two of the primary purposes provided for the revised regulations), specialist reports fail to demonstrate that increased logging and road construction will reduce these risks. In fact the Fuel Management and Fire Suppression Specialist Report actually finds that fires in Idaho tend to be smaller and less frequent in Roadless Areas.

Finally, the DEIS (p. 3-220) concludes that “As population growth and associated land uses and land conversions place pressures on both NFS and non-NFS lands, the value and importance of Idaho Roadless Areas in conserving biological diversity will probably increase.”

For these and other reasons, we [Idaho Conservation League] question how the Forest Service makes the determination that there is a need to weaken protections in light of the purpose and need identified in the DEIS. (Preservation/Conservation, Boise, ID - #4156.117-118.20000.130)

2-25 Public Concern: The Forest Service should dismiss the State’s petition and continue to implement the 2001 Roadless Rule.

BECAUSE THE DEIS DOES NOT ADEQUATELY ANALYZE ECONOMIC AND ECOLOGICAL IMPACTS

The Roadless Area characteristics listed below have the potential to be affected by the promulgation of the Proposed Rule. Pgs 35-37:

High quality air, soil and water have the potential to be affected by the promulgation of the Proposed Rule; can affect the ability of a Roadless Area to provide quality drinking water; can affect the diversity of a Roadless Area; can change the ability of a Roadless Area to provide habitat for listed species or SSS [special-status species]; could change the amount or condition of reference landscapes; could change the amount of dispersed recreation opportunities; can affect the scenic quality of an RA [Roadless Area]; can affect TCPS [Traditional Cultural Places] or cultural/historical sites in the RA.

The DEIS indicates all of these impacts are foreseeable and probable if the USDA [U.S. Department of Agriculture] approves and promulgates the Proposed Rule. The potential negative impacts to the entire forest system far outweigh any of the short-term benefits realized by a few special interests. The Tribes conclude that the DEIS does not adequately analyze the associated economic and ecological impacts. On balance, preservation of the IRAs [Inventoried Roadless Areas] remaining in Idaho is the only rational

choice for the USDA, requiring a dismissal of the State's petition and the continued implementation of the 2001 Roadless Rule. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.109.20000.131)

Opposition to the 2001 Roadless Rule

2-26 Public Concern: The Forest Service should replace the 2001 Roadless Rule.

BECAUSE THE NATIONAL FORESTS WERE MEANT TO BE UTILIZED

Our National Forests are meant to be used and not locked up for "display only" purposes. Please maintain access to all users of our National Forests, like cyclists, motorcyclists, ATVs, hunters, prospectors, loggers and miners. Since all Americans use paper, wood, and minerals (iron, aluminum, copper, etc) on a daily basis, it is "greener" to use U.S. supplies of these minerals than to input them from afar. Therefore, it is imperative that this "Roadless Area Conservation Rule" be repealed at once. (Individual, Inglewood, CA - #2981.1.20000.800)

BECAUSE AMERICA NEEDS TO PRODUCE RESOURCES TO ADDRESS OUR TRADE IMBALANCES

We feel it is imperative that the Roadless Rule be set aside [because] America must start producing resources and limit the resources we purchase from other countries. We must end these huge trade imbalances and reduce our world debt or soon foreign countries will own our public lands. (Individual, Mesa, AZ - #6798.3.20000.800)

BECAUSE THE 2001 RULE DOES NOT COMPLY WITH THE MULTIPLE-USE SUSTAINED-YIELD ACT

The RACR [Roadless Area Conservation Rule], because of its "one size fits all" approach, by its own terms could not satisfy the multiple use mandate of the MUSYA [Multiple-Use Sustained-Yield Act]. Because it did not provide a detailed analysis of the areas that were determined to be roadless, there was not an opportunity to determine if a roadless designation was the most appropriate management prescription for that tract of land. [Footnote 11: Indeed, it was impossible to tell in some instances in the RACR what truly was, as a matter of fact, an Inventoried Roadless Area [IRA]. The State rule being proposed also addresses this shortcoming, since the process by definition is "closer to the ground."] The Proposed Idaho Rule, with the analysis of each IRA, has provided the ability for a site-specific approach necessary to implement the multiple use policy on the ground. (Mining Industry/Association, Boise, ID - #1795.7.20000.160)

BECAUSE THE 2001 RULE VIOLATES THE AMERICANS WITH DISABILITIES ACT

We feel it is imperative that the Roadless Rule be set aside [because] making large parts of our public lands inaccessible by roads [is] discriminatory and essentially excludes the elderly and handicapped from access to these areas, which violates the Americans with Disabilities Act which is supposed to guarantee access to all. (Individual, Mesa, AZ - #6798.5.20000.130)

BECAUSE THE 2001 RULE USES ONE STANDARD AND DOES NOT PROVIDE FOR MULTIPLE USES

The RACR [2001 Roadless Area Conservation Rule] did not provide an opportunity for the analysis of environmental and economic impacts of for coordination of multiple uses. Thus the RACR was inadequate and poorly structured by applying one set of standards uniformly to every Inventoried Roadless Area. (Individual, #1815.10.21000.800)

BECAUSE PUBLIC LANDS SHOULD NOT BE MANAGED BY RADICAL ENVIRONMENTAL GROUPS

We feel it is imperative that the Roadless Rule be set aside [because] the Roadless Rule essentially turns over our public lands to be managed by radical environmental groups whose motives and patriotism we severely question. (Individual, Mesa, AZ - #6798.6.20000.051)

BECAUSE THE 2001 RULE HAS RESULTED IN HUGE WILDFIRES

We feel it is imperative that the Roadless Rule be set aside [because] the Roadless Rule has proven to be detrimental in that it has resulted in huge wildfires that are difficult to control and the build-up of materials creates fires so hot that the ground itself is sterilized. (Individual, Mesa, AZ - #6798.7.20000.260)

BECAUSE A NATIONAL SET OF STANDARDS CANNOT ADDRESS SPECIFIC FOREST ISSUES

I have never believed that a national, all encompassing management plan suits the needs of a specific forest area. Each forest is unique unto itself. I liken it a bit to using a shoe horn to get the ugly stepsister's foot into Cinderella's glass slipper. You might force it in there, but no one, not even the step-sister is happy with the outcome. (Individual, #326.4.40000.160.400)

Requested Revisions to the Idaho Roadless Rule

2-27 Public Concern: The Forest Service should include a clearly stated Purpose and Need.

BECAUSE INCLUSION IN THE DEIS ALONE IS NOT SUFFICIENT

A Purpose and Need for the proposed Idaho Rule is not included in the proposed Idaho Rule. It is impossible to assess the purpose and need without its inclusion in the rule. Inclusion in the DEIS is not adequate, because the specific rule is not defined through a purpose and need section, only the underlying assumptions, which may or may not be included in the final Idaho Rule. The 2001 final Roadless Rule states its need for action as, "adoption of this final rule ensures that Inventoried Roadless Areas will be managed in a manner that sustains their values now and for future generations (pg 3247)." How does the need for the proposed Idaho Rule address the need to sustain roadless values now and for future generations? What are the cumulative or summary ecological effects of diminished roadless values from decreased protection in the Idaho Roadless Rule, in comparison to the 2001 Rule? Where is a summary or cumulative effects table to compare how roadless values are sustained for future generations? (Organization, #1693.6.20000.740)

2-28 Public Concern: The Forest Service should acknowledge that the Idaho Roadless Rule may not meet the stated Purpose and Need.

BECAUSE THE AGENCY'S OWN ANALYSIS DOES NOT SUPPORT THEIR ASSERTIONS

As part of the purpose and need for the Rule, the DEIS provides a rationale based on protecting communities and forests from the risk of severe fire. However specialist reports do not support this contention. Specifically, the Fuel Management and Fire Suppression Specialist Report states, "whether mechanical treatments reduce the intensity and severity of wildland fire is disputed and uncertain." The DEIS (page 3-159) makes a contrary finding where it finds that fuel reductions projects "could" reduce the severity of fire, yet no reference to any document is found in the reference section that corresponds to this citation. As a result of the lack of information to support the contention that mechanical treatment reduces fire risk, the stated purpose of this Rule is undercut by admissions that the proposed Rule may not even meet that purpose. (Preservation/Conservation, Boise, ID - #4156.49.20000.260)

2-29 Public Concern: The Forest Service should include a provision for periodic review of the Idaho Roadless Rule.

BECAUSE THE MECHANISM FOR MAKING CHANGES IS TOO BURDENSOME

The backcountry theme makes almost no real exceptions for the needed effective management treatments. The process to get the changes or the exceptions that [are] needed is so burdensome and time consuming only the most fanatic of owners would take the challenge on. It is very hard and expensive to fight for the change they believe is needed, unless the rule provide for this. Properties previously undeveloped now have million dollar estates reached on roads that were not recognized in the reviews because they didn't meet the sedan standard. Changes will continue to [be] needed and there should be a re-assessment of the rule or sunset provision in a ten to fifteen year period. (Individual, #762.16.23500.125)

2-30 Public Concern: The Forest Service should cooperate with State and local agencies.**TO BE CONSISTENT WITH THE MULTIPLE-USE SUSTAINED-YIELD ACT AND THE FOREST AND RANGELAND RENEWABLE RESOURCES PLANNING ACT**

The process that has been utilized for developing the Proposed Idaho Rule is consistent with existing requirements for State and local involvement in developing management plans for Inventoried Roadless Areas. The MUSYA [Multiple-Use Sustained-Yield Act] specifically authorized the Department of Agriculture to cooperate with State and local governments in the management of National Forests.

Cooperation between the various State, local, and Federal agencies in the management of forest lands (which State and local governments also own) is vital so that management objectives can be achieved.

The theme from the major Congressional acts governing management of National Forests resounds with the concept that management of National Forests is to be done with the cooperation of State and local governmental agencies. The Proposed Idaho Rule is in concert with the way individual forests traditionally have been managed under these Acts [Multiple-Use Sustained-Yield Act and the Forest and Rangeland Renewable Resources Planning Act]. The Acts require management plans for each individual National Forest, and the management of National Forests is to be done with the cooperation of State and local governmental agencies. The Proposed Rule is consistent with both the MYSUA and the NFMA [National Forest Management Act] principles and process. (Mining Industry/Association, Boise, ID - #1795.11.20000.130)

2-31 Public Concern: The Forest Service should reconsider the assertion that the State of Idaho did not understand the stewardship roads provisions of the 2001 Rule.**BECAUSE IT IS NOT SUPPORTED BY THE FACTS**

We [Idaho Conservation League] are not persuaded by the argument on page 1139 of the Federal Register that representatives of the State of Idaho were under the mistaken impression that the 2001 Rule allowed roads for "stewardship activities." After all, the State of Idaho litigated the 2001 Rule and that litigation record clearly illustrates that the State was well informed as to the allowances and prohibitions associated with it. This is supported by briefs and declarations filed on behalf of the State of Idaho and its representatives. Jim Caswell, who was then serving as the Administrator of the Office of Species Conservation was well versed on the limitations associated with the 2001 Rule. Having served as a National Forest Supervisor during the development of the 2001 Rule, the record clearly confirms his understanding of the 2001 Rule. The notion that he did not understand the impacts of the 2001 Rule is literally beyond belief. The other representatives of the State of Idaho, including David Hensley, Tom Perry and then-Gov. [Governor] Jim Risch are all well educated lawyers who are proficient, if not expert, in the interpretation of government regulations and rules. Regardless of whether or not we buy-in to this argument, we continue to oppose weakening of standards with regards to road construction, logging and mining in Idaho Roadless Areas, unless they meet the clear exceptions of the 2001 Rule. (Preservation/Conservation, Boise, ID - #4156.55.20000.800)

2-32 Public Concern: The Forest Service should clarify how the Idaho Roadless Rule will affect Wild and Scenic Rivers and Research Natural Areas.

The IRR [Idaho Roadless Rule] fails to include Forest Plan special areas like Wild and Scenic Rivers and Research Natural Areas in its proposed action and management direction. This is a failure to disclose how the 345,100 acres will be integratively managed within the context of an IRR management theme. Does Wild and Scenic River management trump a proposal to harvest timber and construct roads within a Wild and Scenic River corridor? This is an inherent and significant failure in our petition planning process. (Recreation/Conservation Organization, Boise, ID - #1723.25.20000.160)

2-33 Public Concern: The Forest Service should provide specific protection for the Caribou-Targhee National Forest.

TO PRESERVE SOME OF THE FEW REMAINING STRONGHOLDS FOR PLANT AND WILDLIFE SPECIES NOT FOUND IN OTHER FORESTS

The CTNF [Caribou-Targhee National Forest], particularly the Caribou portion of the forest, has some of the last remaining IRAs [Inventoried Roadless Areas] that demonstrate the high sagebrush and aspen interface, as well as some prime examples of the aspen/conifer woodland type. These areas provide for significant opportunities for Tribal [Shoshone-Bannock] subsistence resources. By neglecting to provide for specific protections in these areas, the proposed Rule is placing the diversity of Idaho forests at risk. These IRAs provide some of the few remaining strongholds for plant and wildlife species that are not found in other forest systems. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.74.20000.320)

Relationship to the Forest Planning Process

2-34 Public Concern: The Forest Service should clarify the relationship between the Idaho Roadless Rule and Forest Plans.

TO AVOID CONFUSION

With regards to Forest Planning, the preamble offers seemingly contradictory guidance. The preamble's Discussion of Proposed Management Themes on Federal Register page 1138 states, "Themes may also influence other future management choices such as Forest Plan revisions or use determinations." At the same time, on Federal Register page 1141, the preamble section on Accommodating Change states, "during a Forest Plan revision the Forest Service recommends two primitive areas for wilderness designation, therefore, the Agency proposes their designations be changed to WLR." The preamble makes clear that a final Rule would "take precedence over any [Forest Plan]," effectively locking in current management prescriptions. This contradictory direction would cause confusion amongst Forest Planners and line officers tasked with following the direction from the National Forest Management Act and the Idaho Roadless Rule. Finally, it is our understanding that the Forest Service is reconsidering the direction from the preamble that states, "the management direction proposed by these regulations would take precedence over any inconsistent regulatory provision or land and resource management plan [a.k.a. Forest Plan]." This should be clarified by the Forest Service at the February meeting. (Individual, Washington, DC - #4156.157.20000.023)

It needs to be determined how and if the management guidelines of areas included in the General Forest management theme will be altered by subsequent Forest Plan revisions or amendments. A large portion of the areas proposed for General Forest in the Caribou-Targhee National Forest are more closely aligned with the Backcountry/Restoration theme under the current Forest Plans and have stricter guidelines than what is allowed under the General Forest category. It is unclear whether those stronger management guidelines currently in the Forest Plans will become the management guidelines in the Idaho Roadless Rule for those areas in General Forest or if the management guidelines will change after future Forest Plan revisions and amendments.

As discussed on page 1137 of the proposed Idaho Rule, "Consistent with the 2001 rule's approach, the management direction proposed by these regulations would take precedence over any inconsistent regulatory provision or land and resource management plan. It is also consistent with the Secretary's authority to establish regulations to carry out the statutory requirements for planning and the Forest Service's practice that Forest Plans must yield to management direction of a higher order. Forest Plan management direction that is consistent with these provisions remains intact and effective."

It is unclear whether this means that the Rule is loosening regulations in areas proposed for the General Forest category by taking precedence over existing land management plans, or if the Idaho Rule is solidifying the Forest Plans in a way that will take precedence over future land management plan revisions or amendments.

We [Theodore Roosevelt Conservation Partnership] ask that the RACNAC raise this question about the future strength of areas currently managed under General Forest, Rangeland, and Grassland in the Idaho proposed Rule. (Recreation/Conservation Organization, Missoula, MT - #1798.15.23600.160)

2-35 Public Concern: The Forest Service should resolve conflicts between the Idaho Roadless Rule and existing Forest Plans in favor of the Forest Plans.

TO ENSURE COMPLIANCE WITH THE NATIONAL FOREST MANAGEMENT ACT

The Forest Service's Intermountain Region January 30, 2008 Briefing Paper regarding the Payette Forest's review of the Idaho RAC [Roadless Area Conservation] DEIS states: Our review and comparison of the Payette Plan and Id[aho]_RAC reveals that there are actually differences in Id[aho]_RAC management themes and the Payette Forest Plan that are not captured nor accurately reflected in the DEIS due primarily to interpretation and crosswalk of the Payette Plan MPCs [Management Prescription Categories] and Idaho Roadless themes. The document continues: As a result of the misinterpretation of 3.1 with Backcountry, there are approximately 399,553 acres of Roadless Areas of MPC 3.1 that the Id[aho]_RAC places in a less restrictive management category than reflected in the Forest Plan. The Tribe [Nez Perce] believes that the Rule's categorical prohibition on forest management activities that are allowed or provided for under the current LRMPs [Long-Range Management Plans] but which are "inconsistent" and therefore "superseded" under the Rule violates NFMA. The Tribe proposes that the Forest Service resolve this inconsistency by changing the Rule to provide that conflicts between LRMPs and the Rule shall be resolved in favor of the existing LRMPs. (Government, #1819.23.22310.133)

2-36 Public Concern: The Forest Service should ensure that the Idaho Roadless Rule does not invalidate the Forest Planning process.

Direction for the management of Idaho Roadless Areas, as described in the petition, would be established by regulation. This type of regulation would supersede Forest Plan direction and allocation, and would not be susceptible to change by Forest Plans. This type of ad hoc political management would essentially invalidate the Forest Planning process, objective public involvement, and the Forest Plans. This is a classic case of comparing apples with oranges and producing an untenable hybrid. There has been no integration of planning efforts and objective analysis. (Recreation/Conservation Organization, Boise, ID - #1818.37.22310.160)

Management Themes and Roadless Areas

2-37 Public Concern: The Forest Service should create the proposed management themes without assigning them to particular Roadless Areas.

TO REDUCE COMPLEXITY AND BRING THE CURRENT RULEMAKING IN LINE WITH THE SPIRIT OF THE IDAHO ROADLESS RULE ITSELF

Will the proposed mechanism for administrative corrections and modifications be sufficient to accommodate future adjustments necessary due to changed circumstances or public need?

It appears that a future status change for one Roadless Area would necessitate the whole rulemaking process. I find this inconsistent with the present roadless rule. The current rule changes the designation of over 250 Roadless Areas, while subsequent rulemaking will most likely be limited to one Roadless Area at a time. Hence, if changing one Roadless Area is important enough to initiate rulemaking, then why is the public burdened with the present rulemaking, which has over 250 times the complexity and impact? This is patently unfair to the public. To bring the current rulemaking in line with the rule's own sensibilities, perhaps the classification system can be enacted now, but actual application to a particular Roadless Area needs to happen one at a time. (Individual, Emmett, ID - #1933.6.20000.620)

2-38 Public Concern: The Forest Service should identify all roads and exclude associated areas from Roadless consideration.

All roads including two tracks that are used to reach irrigation facilities, mines, private land, and county asserted RS 2477 claims should be identified and the area associated with them excluded from roadless consideration. (County Government Agency/Elected Official/Association, Council, ID - #2364.12.31000.620)

2-39 Public Concern: The Forest Service should reevaluate the accuracy of the list of Roadless Areas provided in Section 294.28.

Section 294.22 limits Idaho Roadless Areas to the list included at 294.28. We [Idaho Conservation League] urge you to reevaluate the accuracy of this list, and the designation of specific Roadless Areas. (Preservation/Conservation, Boise, ID - #4156.38.21000.600)

2-40 Public Concern: The Forest Service should correct the number of acres ascribed to General Forest and Backcountry/Restoration management themes.

On page 1143, the preamble states that 5.5 million acres are ascribed to the General Forest and Backcountry/Restoration themes. The number of acres should be 5.9 million acres. (Preservation/Conservation, Boise, ID - #4156.16.21200.600)

Roadless Rule Implementation Commission

2-41 Public Concern: The Forest Service should ensure that the Idaho Roadless Rule includes the Implementation Commission.

**TO ENSURE THAT COUNTY AND LOCAL CITIZENS HAVE MEANINGFUL ROLES
IN IMPLEMENTATION OF THE IDAHO ROADLESS RULE**

County participation in implementing the Rule and Roadless Area management. The Idaho Petition and Proposed Rule provide for continued collaborative participation in implementing the Rule by Counties and other stakeholders through, among other things, the Governor's Roadless Rule Implementation Commission. Please ensure that the Final Rule expressly includes the Commission and other provisions to assure county and local citizen meaningful roles in working with the Forest Service to implement the Rule's provisions for management of Roadless Areas in Idaho. (Regional/other governmental agency (multi-jurisdictional), Boise, ID - #6545.3.10300.061)

2-42 Public Concern: The Forest Service should clarify how the Implementation Commission will be structured.

INCLUDING THE NUMBER OF MEMBERS AND THE GROUPS THAT WILL BE REPRESENTED

It needs to be determined how the Idaho Roadless Implementation Committee (IC) will be structured and function. From our understanding, the IC will be set up similar to Resource Advisory Committees that were established under the Secure Rural Schools and Community Self-Determination Act. It needs to be determined how many members will be on the IC and from what interest groups (e.g., local government, user groups and national environmental groups) they will be chosen. Hunters and anglers are one of the biggest users of Idaho's Roadless Areas and deserve an equal place at the table on any state decisions affecting these areas, and should be adequately represented on the State Roadless IC. (Recreation/Conservation Organization, Missoula, MT - #1796.3.10200.050)

INCLUDING THE DECISION-MAKING PROCESS THAT THE COMMISSION WILL USE

The only mention of the Governor's Roadless Rule Implementation Commission comes in the preamble to the Idaho Rule. The description of the duties of this Commission is unclear and a potentially significant omission. Idaho Executive Order 2006-43 fails to establish a RAC [Resource Advisory

Committee] like structure, as was committed at several RACNAC [Roadless Area Conservation National Advisory Committee] meetings by Governor Risch and his staff. Instead, the commission mimics the membership of a RAC, yet fails to mirror the decision making process of a RAC. Because this commission may play an important role in the consideration of projects, amendments and decisions with regards to Idaho Roadless Areas, it is important that the Preamble and FEIS include discussion on the scope and effect of potential Commission actions. (Preservation/Conservation, Boise, ID - #4156.3.21000.030)

2-43 Public Concern: The Forest Service should form the Implementation Committee following the model of the Secure Rural School's Resource Advisory Committees.

If a governor-appointed commission is created, we [Great Burn Study Group] suggest that it be styled exactly like the Secure Rural School's Resource Advisory Committees, including the decision making structure. (Place-Based Group, Missoula, MT - #1712.12.22100.001)

2-44 Public Concern: The Forest Service should include motorized recreationists on the Implementation Commission.

TO ENSURE THAT THE PERSPECTIVE OF MOTORIZED RECREATION ENTHUSIASTS IS CONSIDERED

Management decisions should be based on input from a management team that is representative of all citizens needs. This is especially necessary to provide a balanced perspective on the travel management team and when consulting and coordinating with other agencies. There is an inherent bias on management teams that do not include OHV [off-highway vehicle] enthusiasts. We [Capital Trail Vehicle Association] request that the interdisciplinary team (IDT) include motorized recreation planners and enthusiasts in order to adequately speak for the needs of multiple-use and motorized visitors. A multiple-use and motorized recreationists advisory board could also be used to advise the IDT and decision-makers.

Presently, very few Agency staff members are OHV enthusiasts and can represent OHV recreation interests in day-to-day operations and long-term management decisions. OHV enthusiasts understand how to educate, manage, and meet the needs of OHV recreationists. Agency personnel are not able to relate to the needs and challenges of OHV recreationists because they are not familiar with OHVs nor are they typically OHV recreationists. There is an inherent bias on management teams that do not include OHV enthusiasts. We request that the staff on each project team include an adequate number of OHV enthusiasts in order to adequately represent and address the needs of OHV recreationists. The test for an adequate number of OHV enthusiasts on a team should be based on the percentages of visitors. Information from NVUM [National Visitor Use Monitoring Study], USDA [U.S. Department of Agriculture], and CTVA [Capital Trail Vehicle Association] cited that OHV recreationists represent from 25 to 60% of the visitors and the management team should also reflect those percentages. (Motorized Recreation, Helena, MT - #168.242.10200.053)

Timber Harvest and Forest Health

2-45 Public Concern: The Forest Service should eliminate provisions allowing timber harvest and road construction in areas damaged by weather, disease, or insects.

TO APPROPRIATELY RESTRICT TIMBER HARVEST

I foresee the exploitation by special interest (timber) of the paragraph which allows roads into "wind throw, blow down, ice storm damage or disease epidemic" areas that may affect "resource values." This can and will be interpreted by the timber industry that they have the permission to ensure the "resource value" of timber is maintained through harvesting. (Individual, #953.2.21000.830)

2-46 Public Concern: The Forest Service should expand the areas open to timber harvest.

TO REDUCE WILDFIRE RISKS

The proposed Idaho Roadless Rule offers a more balanced management approach to Idaho's forests and is certainly a preferred alternative to the 2001 Roadless Rule which continues to be implemented by court directive. Further consideration should be given to certain areas throughout the State of Idaho where additional forest lands should be open for timber harvests to reduce unwanted wildfire risk, in particular the interface with the Wildland-Urban Interface (WUI) designations. (Organization, #1699.7.20000.260)

2-47 Public Concern: The Forest Service should retain the restrictions on road construction and timber harvest from the 2001 Rule

Even more troubling is the provision in [Section] 294.23(b)(i) that provides for new roads "to facilitate forest health activities permitted under [Section] 294.25(c)(1)." The term "forest health activities" is not defined or limited in any way by the proposed regulations. Section 295.25(c)(1)(ii) provides for the cutting, sale, or removal of timber "to maintain or restore the characteristics of ecosystem composition and structure or to reduce the significant risk of wildland fire effects." This exemption is much broader than the timber harvesting provision in the 2001 Rule. The 2001 Rule limits the cutting or sale of timber to "generally small diameter timber" needed for the particular purpose in the regulations. The limitation to generally small diameter timber restricts the Agency from undertaking traditional timber sale activities in Roadless Areas. Removal of this limitation opens wide the gate for continuing the logging program in Roadless Areas in Idaho. In addition, the proposed language eliminates the phrase "such as to reduce the risk of uncharacteristic wildfire effects." Thus, the Agency can build roads and harvest large diameter timber whenever it determines it wants to maintain or restore ecosystem composition or it wants to reduce the significant risk of wildland fire effects. In the West, given the fire regime, the Agency can always attempt to justify logging as a means to reduce wildland fire effects. However, this doesn't mean it is good policy or the right thing to do in Roadless Areas. The Agency should concentrate its fuel reduction resources where communities are actually at risk--not in Roadless Areas. (Organization, #1803.13.20000.261)

TO AVOID THE BROAD, VAGUELY WRITTEN EXCEPTIONS OF THE IDAHO ROADLESS RULE

The Idaho proposal paints a "kick me" sign on the back of every Forest Service manager, and the timber industry will be quick to take advantage of it. Remember, some forestry schools still teach that logging is necessary for "forest health." Nothing in the Rule sets a clear limit to how much logging and road-building could be done under these broad, vaguely written exceptions. The Forest Service should stick with the clear exceptions already spelled out in the 2001 Rule. They provide for urgent needs in case of fire, insects, and disease without giving the whole ballgame away. (Individual, Baltimore, MD - #6549.4.20000.260)

2-48 Public Concern: The Forest Service should dramatically reduce timber harvests under the proposed Idaho Roadless Rule.

BECAUSE TIMBER HARVESTS WOULD IMPACT TRIBAL RESOURCES

Under the Proposed Rule, timber harvest is directly permitted in Primitive and BCR themes to reduce the risk of wildfires and is open in the GFRG [General Forest, Rangeland, and Grassland] theme. Under the 2001 Rule, no timber harvests were allowed unless the threat was immediate. Under the Proposed Rule, roughly 4 million board feet of timber on about 800 acres will be harvested. Compare that with about .5 million-board feet on about 100 acres under the 2001 Rule. The Tribes [Shoshone-Bannock] rely on forest systems for subsistence and timber harvests within an IRA [Inventoried Roadless Area] would impact Tribal resources. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.80.20000.830)

2-49 Public Concern: The Forest Service should not change the description of wildfire from “uncharacteristic” to “unwanted.”

BECAUSE THIS CREATES A DISCRETIONARY LOOPHOLE

The key difference between the 2001 Rule and the IRR [Idaho Roadless Rule] is the descriptive change from “uncharacteristic” (2001 Rule) to “unwanted” (IRR) to describe wildfire. This change provides a discretionary loophole for timber harvest and road construction. (Recreation/Conservation Organization, Boise, ID - #1818.58.21000.260)

2-50 Public Concern: The Forest Service should not change language allowing road construction from “imminent threat” to “significant risk.”

TO REDUCE UNCERTAINTY AND THE POSSIBILITY OF INCREASED ROAD CONSTRUCTION

Management theme 3: Primitive, and Management theme 4: Backcountry/Restoration, include 6,902,400 acres, almost 75 percent of the original Roadless Areas in Idaho. The language under Desired Conditions used in the two themes opens the door to unlimited logging based on “protecting ecological integrity” and “restoring the characteristics of ecosystem composition and structure.” The state should stay with the original language in the 2001 Rule of “imminent threat” and stop all road building in Roadless Areas unless under the 2001 Rule’s authorization. (Individual, #308.6.21000.261)

Adding the language “significant risk” to “imminent threat” within the rule, without tighter clarification, to allow road building in the 5.4 million acres of Backcountry Restoration adds uncertainty to the future of over half of Idaho’s Roadless Areas. This is not in the best interest of Idaho’s values. (Individual, #812.5.21000.2)

BECAUSE THE NEW LANGUAGE IS NOT NEEDED

The 2001 Roadless Area Conservation Rule provided common-sense measures to allow for responsible thinning projects to protect communities at-risk of wildland fires. Such projects have been carried out in several places around the country, including Myrtle Creek in Idaho, to reduce the fire threat. Changing the language for initiating these projects from “imminent threat” to “significant threat” under the Petition is unnecessary as the current Rule provides for the protection of at-risk communities (Individual, #238.5.21000.262)

BECAUSE THE TERM IS NOT BROADLY ACCEPTED BY FORESTERS OR THE PUBLIC

The Idaho Rule expands the criteria where the road construction is allowed to include road construction “to facilitate forest health activities permitted under 294.25 C (1),” which is the undefined significant risk clause.

The 2001 Rule did not include logging and road-building exceptions for forest health, likely because it is not a term or concept with broad acceptance among foresters or the public. The 2001 Rule did not include a definition of the forest health, likely because it was not applied to the FEIS analysis. (Recreation/Conservation Organization, #1649.99.43000.100)

2-51 Public Concern: The Forest Service should clearly define the term “significant risk.”

TO CLARIFY WHEN TIMBER HARVEST WOULD BE PERMITTED

While the 2001 Rule prohibited road construction and timber harvest because it leads to a loss of roadless characteristics, the 2001 Rule also established four criteria where small diameter, infrequent logging could be considered. Most of these criteria in the 2001 Rule are carried into the Idaho Rule--with one major exception. The 2001 Rule stated logging could be done:

To maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects, within the range of variability that would be expected to occur under natural disturbance regimes of the current climatic period.[Footnote 99: Ibid].

However, in an ambiguous rewording, the Idaho rule changes the criteria where logging could be done in Backcountry areas to:

To maintain or restore the characteristics of ecosystem composition and structure, or to reduce the significant risk of wildland fire effects [Footnote 100: 36 CFR 1153][[Change Italicized.]]

Yet, nowhere in the DEIS or Idaho Rule is the term “significant risk” defined, nor is it referenced to or defined in WUI discussion of the DEIS. The DEIS makes extensive reference to fire regimes and fuel condition classes, but nowhere does it map where forests at “significant risk” are located on the landscape. In addition, nowhere in the broad definition of WUI is one able to discern or identify its relationship to the “significant risk” rationale that would necessitate timber harvest in these areas. (Recreation/Conservation Organization, #1649.98.70300.100)

TO AVOID MULTIPLE INTERPRETATIONS OF THE IDAHO ROADLESS RULE

In trying to reconcile Governor Risch’s assurance that the Rule he wanted comported with the limitations of the 2001 Rule in the Backcountry theme with Governor Risch’s desire to have greater flexibility to prevent wildfire damage in WUI [Wildland-Urban Interface] and municipal watersheds, the Forest Service has added the term “significant risk” which is not defined in the Rule or its Preamble, in order to allow temporary roads in the Backcountry theme in instances where the 2001 Rule did not allow them. The Agency has also made other changes to the Idaho Rule Backcountry theme that differ from the 2001 Rule, including removing language about “infrequent” use of timber harvesting and limiting cutting to “generally small diameter” trees. Also, language in the timber section for the Primitive theme appears to give that theme less protection than the 2001 Rule in regards to logging along existing roads. The proposed Rule allows permanent roads in the Backcountry theme, and there are no provisions for decommissioning temporary roads used for timber harvest.

These deviations from the 2001 Rule seem to go against the consensus reached by the RACNAC in our review of the Petition. Further, this lack of specificity means that the Rule can be interpreted in different ways and does not give current or future line officers real guidance on what can be done and where it can be done. It opens the Rule to claims that the entire Backcountry theme is subject to significantly fewer or weaker protections than the 2001 Rule. (Preservation/Conservation, Boise, ID - #4156.170.20000.600)

BECAUSE THE LANGUAGE IS NOT LIMITING

The Idaho Rule does not clearly define the limited circumstances where timber harvesting is permitted. The Idaho rule permission to allow timber harvest “to reduce the significant risks of wildland fire effects” is not clear and is not limiting. Most, if not all of Idaho roadless forests face “significant risks of wildland fire effects,” because these are fire-prone and fire adapted ecosystems. Further, most, if not all of the “wildland fire effects” are positive and natural for these forest ecosystems, if in some cases problematic for communities and individuals. (Recreation/Conservation Organization, #1649.101.43000.100)

BECAUSE REFERENCE TO THE HEALTHY FOREST RESTORATION ACT INTERIM FIELD GUIDE IS NOT LEGALLY SUFFICIENT

“Significant risk” must be defined in the Rule itself. Reference to the HFRA [Healthy Forest Restoration Act] Interim Field Guide is not legally sufficient and not practical. All of the parts of the operating definition of “significant risk” in the Field Guide should be pulled into the Rule and its preamble, as appropriate, and then honed to fit the situation with Idaho Roadless Areas. (Preservation/Conservation, Boise, ID - #4156.181.21000.001)

2-52 Public Concern: The Forest Service should not use tree disease as a reason to harvest.

BECAUSE THE SCIENCE USED TO JUSTIFY HARVESTING IS QUESTIONABLE

Tree diseases: trees have been fighting off diseases for eons and to make that a justification for felling thousands of acres of trees makes absolutely no sense. You have to see which ones survive and keep those. You can’t cut them all down so you don’t know which ones can make it and which ones can’t. You also can’t do planting of all one variety as the forest service so many times seeks to do. [The] Forest

Service uses junk science “disease” scares to try to justify their profiteering for political profiteering. The horrendous logging this agency authorizes is a ruse, a mask for destruction and profiteering. (Individual, Florham Park, NJ - #214.10.42000.720)

2-53 Public Concern: The Forest Service should clearly define the threshold for active management for forest health.

The threshold for more active management due to forest health should be clearly defined. How many acres of trees need to be infested by disease or insects before active management is appropriate? How many acres should burn before planting is an option? After and [during] burning and reburning, should there be a threshold number of trees that return within a period of time after which planting fire resistant species is required? (Individual, #1825.54.21000.260)

2-54 Public Concern: The Forest Service should expand the definition of forest health.

TO INCLUDE WATERSHEDS, WATER QUALITY, FISH AND WILDLIFE HABITAT, AND ECOSYSTEM PROCESSES

Forest health is not just confined strictly to trees, insects, and diseases. What about watersheds, water quality, fish and wildlife habitats, endangered species, and ecosystem processes? Insects, diseases, and wildfire are natural components of the forest ecosystem. They are required to maintain the long-term resiliency of the forest. The Forest Service has chronically and historically mismanaged these components. (Individual, #268.41.43000.23)

2-55 Public Concern: The Forest Service should remove the words “forest health” from Section 294.23(b)(1)(i).

Remove the words “forest health” in [Section] 294.23(b)(1)(i) and the associated definitions. (Preservation/Conservation, Boise, ID - #4156.185.21000.001)

2-56 Public Concern: The Forest Service should provide evidence to support the assertion that timber harvesting would reduce the prevalence, spread, or impacts associated with forest health, insects, or disease.

The Vegetation Specialist Report fails to provide evidence that logging reduces the prevalence, spread or impacts associated with “forest health” issues, insects or disease. Even so, the report assumes that logging would accomplish “some measure of forest health improvement.” It is unclear upon what evidence this assumption is based. The Vegetation Specialist Report assumes that “there would be no clearcut or seedtree harvests” in areas proposed for the Backcountry designation. No support for this assumption is provided in the preamble or draft Rule. (Preservation/Conservation, Boise, ID - #4156.50.21000.261)

2-57 Public Concern: The Forest Service should clarify that the Primitive and Special Areas of Historic or Tribal Significance would not be protected at a higher standard than under the existing 2001 Rule.

Section 294.25 includes exceptions for logging activities in Idaho Roadless Areas. Contrary to assertions by the Forest Service and State of Idaho, areas proposed for a Primitive or SAHTS [Special Areas of Historic or Tribal Significance] designations would not be protected at a higher standard than the existing 2001 Rule. Instead, the same exceptions that apply, with regards to logging Backcountry areas, would apply to these areas. (Preservation/Conservation, Boise, ID - #4156.46.21000.261)

2-58 Public Concern: The Forest Service should ensure that roadless characteristics cannot be degraded by timber harvest.

Change language in the timber section to ensure that roadless characteristics cannot be degraded by timber harvest. In the Primitive theme, limit timber management to the cutting, sale, or removal of

timber that “will improve one or more of the roadless characteristics.” In the Backcountry theme, require that the cutting, sale, or removal of timber “will maintain all roadless characteristic or improve one or more of the roadless characteristics.” (Preservation/Conservation, Boise, ID - #4156.186.21000.261)

2-59 Public Concern: The Forest Service should explain removal of the “infrequent” and “generally small diameter” language and provide NEPA analysis on the change.

Ask the Forest Service to explain why the “infrequent” and “generally small diameter” language was taken out of the Rule and provide the NEPA analysis necessary to support that change.

Ask the Agency to consider keeping that small diameter language in the Idaho Rule, especially if there is no time to prepare the NEPA analysis necessary to support the change.

Another option: take the positive approach, instead of the negative. Add in old growth and large tree retention requirements, like in the HFRA [Healthy Forest Restoration Act]. This would not inhibit work in even-aged or same-size stands where that work is needed, but it would give assurances/protection in areas that do have old growth or large trees. (Preservation/Conservation, Boise, ID - #4156.187.21000.261)

2-60 Public Concern: The Forest Service should clearly define the Wildland-Urban Interface.

TO AVOID LEGAL PROBLEMS

One critical issue in this problem [lack of specificity in Rule] is how to define and delineate WUI [Wildland-Urban Interface]. It is imperative that the definition of WUI be definite and finite and not subject to change without further rulemaking. To have a WUI that can be changed by non-federal officials at any time will not fly legally or with the public. Thus, to rely upon the CWPPs [Community Wildfire Protection Plans] for the Rule’s definition of WUI would invite defeat in court. Without express authorization from Congress, State officials cannot have the power or authority to change the scope or applicability of the Rule; to Cede Federal rulemaking power for the Forest Service to local officials is not authorized.

Therefore, the definition of WUI needs to be something clearly defined and delineated in the Rule; it needs to be something whereby everyone can agree on exactly how many acres are involved and where the lines are. If the Rule contains a definition that results in differing interpretations of what the WUI is and where the WUI is, or if the Rule allows the WUI to be changed by nonfederal officials, such a definition would most likely be held to be an arbitrary and capricious decision by the Ninth Circuit. (Preservation/Conservation, Boise, ID - #4156.171.21000.263)

2-61 Public Concern: The Forest Service should clearly define Wildland-Urban Interface and municipal watersheds.

TO CLEARLY DELINEATE THOSE AREAS

[ATT 14] WUI [Wildland-Urban Interface] and municipal watershed definitions need to be refined and expanded to give detailed and clearly delineated limits to those areas. The final Rule should be able to be read by anyone and have the reader know exactly how many acres are in those categories and where those acres are. Options:

-Define WUI by a specific distance from communities. One option would be to use the general definition in the HFRA [Healthy, Forest Restoration Act].

-Define WUI by the areas that need and will get the most treatment. One example is The Wilderness Society’s Community Fire Planning Zone system (provided to us [Ray Vaughan, Wildlaw, RACNAC Committee Member] by TWS).

-Use CWPPs [Community Wildfire Protection Plans] with another test overlaid on them to insure that work is done in critical areas only. Also, to use this option, the Rule must provide that amendments to CWPPs do not amend the Rule without full use of the change clause first.

-Define WUI areas not by generic definitions but by actual known areas that need treatment. The DEIS already projects that work in the WUI/watersheds will be only 12,000 acres in the next 15 years. Unless that number is pure guess, it was based on known needs and priorities. If that is a known set of places, as it appears that it is, the Rule could just set those out as the areas that can use the “significant risk” exception and let the rest of Backcountry be subject to the “imminent threat” exception of the 2001 Rule. Limiting this exception to known and provable areas of need would be hard to oppose. If new needs appeared later or after the 15 years of the DEIS’s predictions, they could be specifically addressed through the change clause. (Preservation/Conservation, Boise, ID - #4156.182.21000.263)

Road Construction

2-62 Public Concern: The Forest Service should not allow temporary road construction.

Because temporary roads are not temporary, because temporary roads are not ecologically benign, because temporary roads will not have maintenance, closure, or decommissioning requirements and funding, and because temporary roads damage roadless characteristics, no exception to allow temporary roads in Roadless Areas for any reason should be permitted, regardless of how the term “temporary road” is defined. (Organization, #1824.15.64300.2)

BECAUSE THE AGENCY CANNOT POLICE THE ROADS IT ALREADY HAS

By opening the rest of these Roadless Areas to mining, logging, and development we expand the number of roads. I have heard terms like temporary, decommission, obliterate, etc. The Forest Service does not have the time to police these roads to make sure they will never be used again. Even with gates the Off Highway Vehicles (OHV) go wherever they want. With some of these new models approaching 750cc there is no stopping them. Recently the Westside District conducted a Defensible Space project. It entailed only 100 acres but stretched for 2 miles. Prior to this project this was a secure cover area for wildlife. In the few months after the completion of the project there was already a pioneered road from illegal off road use from this “fire trail.” The place will never be the same for big game species. Again the Forest Service does not have the resources or time to enforce off road use. Pioneered trails are the scourge of public lands. (Individual, Idaho Falls, ID - #1198.2.64200.530)

BECAUSE THE AGENCY ALREADY HAS A BACKLOG OF ROAD MAINTENANCE

Allowing even temporary roads, “if they don’t alter the roadless nature” into IRAs [Inventoried Roadless Areas] provides a false sense of security. Once a temporary road is punched in, the nature of that area is permanently altered in terms of wildlife and the non-motorized recreationist. Given the \$650 million backlog of forest roads in need of maintenance, Idaho forests have a poor track record in terms of “temporary” roads in need of maintenance or obliteration. (Individual, Boise, ID - #756.7.64300.002)

2-63 Public Concern: The Forest Service should acknowledge that closing and decommissioning temporary roads is unlikely to be funded.

Nowhere in the Idaho Rule is there any discussion of temporary road closures and/or temporary road decommissioning. Even if temporary roads were required or recommended to have closures or decommissioning, any expectation there would be funding for these expensive and controversial actions is not realistic. The 2001 rule stated “The agency receives less than 20 % of the funds needed to maintain the existing road infrastructure.” Things have not improved for Forest Service road funding. The Idaho DEIS states, “in fiscal year 2006, the Forest Service received less than 20 percent of the estimated funding needed to maintain its existing road infrastructure (Moore 2007.)”

Any expectation that Idaho will receive additional funds to close, decommission or maintain temporary roads for forest health activities in Roadless Areas is not realistic. Diverting appropriated money now budgeted to Idaho National Forests for this temporary road work will only divert money from the other under-funded, existing backlog of road maintenance and restoration work. (Preservation/Conservation, #1693.34.64300.860)

Any expectation that Idaho will receive additional funds to close, decommission, or maintain temporary roads for forest health activities in Roadless Areas is not realistic. Diverting appropriated money now budgeted to Idaho National Forests for this temporary road work will only divert money from the other under-funded, existing backlog of road maintenance and restoration work. (Organization, #1824.13.64300.860)

2-64 Public Concern: The Forest Service should disclose how roads were identified, verified, or ground-truthed.

The preamble on page 1144 discloses 1,800 miles of roads in Idaho Roadless Areas. After a review of the GIS data associated with this determination, it appears that many roads are simply not in existence, are trails or have revegetated and should no longer be considered roads. No disclosure is provided as to how these roads were identified, verified or ground-truthed. (Preservation/Conservation, Boise, ID - #4156.25.21000.680)

2-65 Public Concern: The Forest Service should acknowledge that temporary roads may be permanent in practice.

The 2001 rule and the Idaho DEIS use similar but significantly different definitions of temporary roads. Definitions were not included in the Idaho rule.

The 2001 rule states:

“Temporary Road. A road authorized by contract, permit, lease, other written authorization, or emergency operation, not intended to be part of the forest transportation system and not necessary for long-term resource management.”

The Idaho DEIS states:

“Temporary road or trail. A road or trail necessary for emergency operations or authorized by contract, permit, lease, other written authorization that is not a forest road or trail and that is not included in a transportation atlas.”

The key provision dropped from the Idaho rule is “not necessary for long-term resource management.” With road construction permitted “to facilitate forest health activities,” these new roads may be used for long-term forest health management.

In neither definition is there a requirement or even an expectation that temporary roads will be temporary, as defined by Random House as “1. lasting, existing, serving or effective for a time only; not permanent.” The term itself is a misnomer as many temporary roads still exist well past their intended use purpose. Temporary roads may not be included in the transportation atlas, but the physical and ecological imprint is still the same as a permanent road. As far as impacts to roadless characteristics are concerned, temporary and permanent roads can have the same effect. (Preservation/Conservation, #1693.32.64300.100)

The direction for temporary roads is characterized by weakness and vacillation. If a responsible official determines that a permanent road meets one or more of the loopholes and that the addition of a permanent road would not substantially alter roadless characteristics, than the road would become permanent. The term substantially is not defined or quantified. “Temporary” roads on National Forest lands often become permanent because the Agency lacks sufficient funding to obliterate them. (Individual, #268.15.23000.680)

2-66 Public Concern: The Forest Service should require that all temporary roads for timber management be decommissioned and restored.

TO BE CONSISTENT WITH THE MINING PROVISIONS OF THE IDAHO ROADLESS RULE

The Forest Service needs to add in requirements that all temporary roads for timber management have to be decommissioned and restored. There is a section in the mining section of the proposed Rule that requires roads used for mining be decommissioned. The timber section should have the same. The

Agency should make the language of the decommissioning subsection clearer and more detailed.
[Footnote 3: An idea I like about this issue:

When considering the need for a temporary road the Responsible Official must first consider the need of the temporary road after reviewing other access options, resource and community protection needs, and consistency with applicable Forest Plans. If it is determined that a temporary road is needed, construction must be conducted in a manner that minimizes effects on surface resources, prevents unnecessary or unreasonable surface disturbances, and complies with all applicable lease requirements, land and resource management plan direction, regulations, and laws. When temporary roads are no longer needed or upon termination or expiration of the lease, contract or permit, whichever is sooner they shall be decommissioned and the affected landscape restored. Restoration shall be designed considering safety, costs, and impacts on land and resources (ref. 16 USC 1608) with a goal of stabilization and restoration of unneeded roads to a more natural state (ref. 36 CFR 212.1). (Preservation/Conservation, Boise, ID - #4156.179.21000.680)

2-67 Public Concern: The Forest Service should eliminate the exception for stewardship roads.

Lt. Gov. [Lieutenant Governor] Risch has made the case that stewardship roads should be acceptable in certain locations and conditions in Idaho Roadless Areas of Backcountry and General Forest themes. The Forest Service converted the stewardship road terminology to its temporary road definition. No stewardship roads should gain an exception in Roadless Areas. (Recreation/Conservation Organization, #1649.108.64300.1)

2-68 Public Concern: The Forest Service should define “substantially” in relation to temporary roads.

BECAUSE THE TERM IS NOT DEFINED OR QUANTIFIED

The direction for temporary roads is characterized by weakness and vacillation. If a responsible official determines that a permanent road meets one or more of the loopholes and that the addition of a permanent road would not substantially alter roadless characteristics, than the road would become permanent. The term substantially is not defined or quantified. Also, “temporary” roads on National Forest lands often become permanent because the Agency lacks sufficient funding to obliterate them. (Recreation/Conservation Organization, Boise, ID - #1723.16.21000.680)

Mineral Activities

2-69 Public Concern: The Forest Service should explain how mining within Roadless Areas would increase the forest health.

BECAUSE THE INCLUSION OF MINING PROVISIONS IS INCONSISTENT WITH THE STEWARDSHIP PRINCIPLES OF THE ORIGINAL STATE PETITION

Taken from the Rule overview, which provides, in part, the rationale for the Rule itself: During his presentation to the RACNAC [Roadless Area Conservation National Advisory Committee], Governor Risch expressed the need for stewardship of Idaho Roadless Areas focusing on limited forest health activities. Clarifying what stewardship means is vital to understanding the petition and subsequent rulemaking. The proposed Rule clarifies this by providing discretion for conducting activities that maintain forest health by reducing the significant risk of wildland fire (also known as wildfire) to communities, municipal water supplies, threatened and endangered species, and to protect ecosystem components in the same manner as provided in the Healthy Forests Restoration Act (HFRA). All project activity will be subject to appropriate National Environmental Policy Act (NEPA) compliance procedures and public comment opportunities. Notice that the stewardship Governor Risch wanted in the Rule was limited to forest health activities such as fire suppression and a clean water supply. It is unclear how mining activities in IRAs [Inventoried Roadless Areas] are a forest health issue; in fact, they are often contrary to the goal of sustainable forestry. The Tribes [Shoshone-Bannock] believe that this

concept of stewardship is taken out of the need for forest health and being used to include cessations of Roadless Areas for mineral exploitation for the next 50 years.

To the Tribes, the term stewardship entails a responsibility on this generation to prevent the degradation of resources that will be passed to our posterity. Nowhere in the proposed Rule or the DEIS, is there a reference to how the exploitation of minerals within IRAs [Inventoried Roadless Areas] will increase the health of an ecosystem for future generations. The referenced comments from the DEIS, in Section VI, document a risk to the ecosystem from mining activities for generations to come. This Rule does not embody the ideal of stewardship and any statement to the contrary is misleading. The Tribes request that any management of the IRAs give due consideration of conservation for future generations of Tribal members. The Tribes should not be forced to bear the burden of unjust management that adversely impacts Tribal rights and traditional cultural practices [Footnote 32: United States Constitution, Article VI, provides that treaties are the supreme law of the land and other acts of Congress. The Tribes question the ability of an administrative agency to enact rules that adversely affect treaty rights without express delegation from Congress]. True stewardship of these Roadless Areas will require that IRAs are preserved in their current condition so that our posterity may enjoy the natural features associated with these IRAs that we do. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.93-94.20000.740)

2-70 Public Concern: The Forest Service should allow phosphate mining in Roadless Areas.

TO SUPPORT THE LOCAL ECONOMIES

The City of Pocatello, Idaho supports the adoption of the proposed Idaho Roadless Rule. The phosphate production industry is vital to the economic well being of not only the entire state of Idaho but also to Southeast Idaho. Phosphate products are used extensively by the agriculture industry. In addition, the J.R. Simplot Company's Don Plant is located near Pocatello, and many of our citizens depend on the good paying jobs this provides. (Government, #1474.1.20000.800)

2-71 Public Concern: The Forest Service should not allow additional phosphate mining in Roadless Areas.

BECAUSE CURRENT MINING PRACTICES HAVE YIELDED A SUPERFUND SITE

If you owned rental property and happened to lease one of your homes to a group of people who then destroyed your carpet, punched holes in your walls, and built a meth lab in your garage (completely destroying the value of your home), would you then turn around and lease these same people another one of your homes? A home that is in pristine condition? Of course not! Unfortunately, this is what the Idaho government plans to do once the 2001 Roadless Rule is no longer in effect.

The Simplot Corporation is about to get the go ahead to once again create another phosphate mine in pristine forest. One needs look no further than their other mine, which happens to be a Superfund site. That mine has poisoned all surrounding water sources, killing over a hundred domestic sheep and doing untold damage to fish and wildlife. They don't even have a plan or the funding to clean it up. Yet our government is ready and willing to lease them more of our property. This defies common sense among other things.

I am an Idahoan as were my parents, grandparents, and even great-grandparents. I know full well the impact of developing forest to line the pockets of the very few. It is time to stop the cycle of bad policy and to conserve what little public land this nation really has left. (Individual - #8986.1.10420.720)

UNTIL MINING COMPANIES CLEAN UP THE POLLUTION THEY HAVE ALREADY CAUSED

I am writing to express my strong disagreement with the plan to compromise The Roadless Rule by allowing additional phosphate mining in Idaho. No additional mining should be permitted until the companies that have already polluted the environment with their poor phosphate mining practices have cleaned up all of that pollution and proven that they will not pollute the environment again through future mining. (Individual, #1454.1.20000.423)

BECAUSE THE PHOSPHATE INDUSTRY HAS CAUSED SIGNIFICANT POLLUTION

In a specific area, I am angry about the proposal to open up 600,000 acres in Southeastern Idaho to roads. Such a decision would open up these backcountry areas to increased phosphate mining. The phosphate industry has proven to be a very poor partner in maintaining a clean environment. We already have many Superfund sites in Southeastern Idaho, which means that we tax payers have to clean up after this industry. Why should they be given even more land for selenium poisoning of the land and ground water, given their unreliable track record? I strongly urge you not to allow this to continue by opening up our public lands in Idaho. (Individual, #285.3.44210.720)

TO PROTECT STREAMS AND RIVERS FROM POLLUTANTS

I know the beauty and fragility of the Western ecology. I urge the Forest Service to decline the application for mining in Idaho National Forests--especially for phosphates, which in postproduction is one of the main pollutants in our rivers and streams by feeding algae blooms. (Individual, #1124.2.44210.243)

BECAUSE THE MINING COMPANIES HAVE BEEN POOR STEWARDS OF PUBLIC LANDS

If you owned rental property and happened to lease one of your homes to a group of people who then destroyed your carpet, punched holes in your walls and built a meth lab in your garage (completely destroying the value of your home), would you then turn around and lease these same people another one of your homes? A home that is in pristine condition? Of course not! Unfortunately, this is what the Idaho government plans to do once the 2001 Roadless Rule is no longer in effect.

The Simplot Corporation is about to get the go ahead to once again create another phosphate mine in pristine forest. One need look no further than their other mine, which happens to be a superfund site. That mine has poisoned all surrounding water sources, killing over a hundred domestic sheep and doing untold damage to fish and wildlife. They don't even have a plan or the funding to clean it up. Yet our government is ready and willing to lease them more of our property. This defies common sense among other things.

I am an Idahoan as were my parents, grandparents and even great-grandparents. I know full well the impact of developing forest to line the pockets of the very few. It is time to stop the cycle of bad policy and to conserve what little public land this nation really has left. (Individual - #8986.1.10420.720)

TO PROTECT FISH HABITAT

I would also like to specifically address potential impacts to Roadless Areas in my part of the state - the Caribou/Targhee National Forest. Your own environmental analysis (page 192) states that phosphate mining can be very hazardous to fish. Yet, a huge block of roadless land in the Caribou/Targhee will be handed over to the phosphate industry for development. Not only will this put our wild trout populations in jeopardy, but it could destroy some of the best mule deer and elk hunting in Idaho. (Individual, #125.3.44210.2)

BECAUSE OF THE SELENIUM CONTAMINATION THAT COULD RESULT

We're [Earthjustice] especially concerned that the proposal would make hundreds of thousands of acres of Roadless Areas available for mining and specifically that 545 million tons of phosphate could be mined on nearly 8,000 roadless acres near Yellowstone National Park. Any increase in phosphate mining would worsen the already serious problem of selenium poisoning in local streams and aquifers. Selenium is an extremely dangerous contaminant known to cause birth defects which bioaccumulates in the food web, persisting for centuries after entering the environment. The Caribou Targhee National Forest on the border of Yellowstone and Grand Teton National Parks is especially at risk. (Individual, #218.68.44210.200)

2-72 Public Concern: The Forest Service should not allow open pit mining under the Idaho Roadless Rule.**BECAUSE IT WILL LEAD TO SELENIUM CONTAMINATION**

One must ask why the U.S. Forest Service would propose a rule change that would allow and encourage further open pit mining with additional selenium contamination of public lands and streams? Why would

the USFS be promoting the creation of additional Superfund cleanup sites on public land in Southeast Idaho? The answer may be related to the fact that this proposed Rule change was initiated by former Idaho Governor Dirk Kempthorn, prior to his appointment to Secretary of Interior by the Bush administration. The public may need to be reminded that prior to his political career Mr. Kempthorn worked for the FMC Corporation as a “Public Relations Spokesman.” And as we all know Idaho’s current Governor has a long personal and financial relationship with the phosphate mining industry. (Individual, #1952.4.10440.30)

2-73 Public Concern: The Forest Service should not use the assertion that Idaho is a critical source for phosphate as a rationale for the Idaho Roadless Rule.

BECAUSE ADDITIONAL MINES ARE NOT NEEDED TO MEET DEMAND

As to phosphate being a nationally critical resource with Idaho being the primary source, this is somewhat of a red herring. Idaho only produces about 10% of the phosphate in the US. Also, some mines in the US have closed as capacity has been brought on line in other countries such as Morocco and China. To say that we need to open additional acreage to mining in Idaho seems counter-intuitive. Besides, we all know that if, at some time in the future, phosphate became a critical US resource, Congress would simply pass a law opening up areas to additional mining. We don’t need to destroy even more Roadless Area now for a commodity chemical that is available in abundance on the world market. We believe that Idaho’s Roadless Areas should be managed under the existing 2001 Roadless Area Conservation Rule. (Individual, Idaho Falls, ID - #8937.5.20000.840)

2-74 Public Concern: The Forest Service should protect the right of access to existing leaseholds.

TO ENSURE THAT PROPERTY RIGHTS ARE NOT TAKEN IN VIOLATION OF THE CONSTITUTION

When the RACR [Roadless Area Conservation Rule] was proposed, the Forest Service recognized that it must protect existing rights under other Federal laws. The RACR provided exceptions from the national prohibition on construction of roads in several circumstances including “when a road is needed pursuant to reserved or outstanding rights, or as provided for by statute or treaty.” [Footnote 5: 36 CFR 294.12(b)(3)] Simplot holds leasehold interests that are outstanding rights as provided for in the Mineral Leasing Act. The right of access to such leaseholds must be protected in order to insure that Simplot’s property rights are not taken in violation of the Due Process Clause of the United States Constitution. The final RACR actually recognized this point, stating with regard to regulatory takings analysis, the rule, “honors access to private property pursuant to statute and to outstanding or reserved rights.” [Footnote 6: 66 Fed. Reg. 3244, 3271 (1/12/01)]. The final EIS on the RACR recognized this point as well: Construction or reconstruction of roads that are reasonable and necessary for development of existing energy or mineral leases, for access to existing energy or mineral leases and for access to associated product conveyance lines would be allowed as necessary to fulfill the terms of the lease. Final EIS at 3-259.] Simplot supports the Proposed State Rule because it clarifies that existing rights under the Mineral Leasing Act must be protected in the context of Roadless Area management in order to stay within in the bounds of the Due Process Clause prohibition on regulatory takings. (Mining Industry/Association, Boise, ID - #1795.3.20000.120)

2-75 Public Concern: The Forest Service should ensure that the Idaho Roadless Rule does not preclude access to existing mineral leases.

There is an inconsistency between language in the preamble and Proposed Rule language in regard to phosphate leases in areas placed in the Primitive theme.

The preamble on page 1140 (Federal Register, Volume 73, January 7, 2008) has the following language: “If promulgated, in designated WLR, SAHTS, or primitive areas, the Forest Service would not recommend, authorize or consent to road construction or reconstruction or surface use and occupancy associated with mineral leases. This leasing restriction is more restrictive than the 2001 Rule.” [Footnote 24: 73 Fed. Reg. 1140 (Jan. 7, 2008).]

However, the Proposed Rule makes clear that existing rights are not restricted by this Rule (see [Section] 294.24(a)). There are at least two existing phosphate leases in the Mount Jefferson IRA [Inventoried Roadless Area] (Targhee National Forest) currently under the Primitive theme. If all existing phosphate leases within an IRA and KPLAs [Known Phosphate Leasing Areas] are moved into the GFRG [General Forest, Range and Grassland] theme (as recommended above), then the language in the preamble need not be changed. If all existing leases in IRA and KPLAs are not moved into GFRG theme, then the preamble needs to be changed to acknowledge these existing leases and the rights associated with them, consistent with the language of the Rule. If, and only if, all existing phosphate leases and KPLAs within the Backcountry and Primitive themes are reclassified as GFRG theme, then the following language change is recommended: “[Section] 294.24 (d) After [[final rule effective date]], the Forest Service will not recommend, authorize, or consent to road construction or reconstruction associated with mineral leases in Idaho Roadless Areas that are listed as backcountry/restoration; [delete] except such road construction or reconstruction may be authorized in association with phosphates leasing. [delete] Surface use or occupancy without road construction or reconstruction is permissible for all mineral leasing.”

If changes are not made to move existing leases and KPLAs under the Backcountry or Primitive themes to the GFRG theme, then Simplot recommends the following changes in the Rule:

[Section] 294.24 (c) After [[final rule effective date]], the Forest Service will not recommend, authorize, or consent to road construction or reconstruction associated with mineral leases in Idaho Roadless Areas that are listed to be managed pursuant to wild land recreation, special areas of historic or Tribal significance, and primitive themes; except such road construction or reconstruction as will be authorized in association with [Section] 294.24(a).”

“[Section] 294.24 (d) After [[final rule effective date]], the Forest Service will not recommend, authorize, or consent to road construction or reconstruction associated with mineral leases in Idaho Roadless Areas that are listed as Backcountry/Restoration; except such road construction or reconstruction may be authorized in association with activities allowed by [Section] 294.24(a) or with phosphate leasing within a KLPLA. Surface use or occupancy without road construction or reconstruction is permissible for all mineral leasing.” (Mining Industry/Association, Boise, ID - #1795.21-22.21000.423)

2-76 Public Concern: The Forest Service should limit road construction associated with phosphate mining to existing leases and to Known Phosphate Lease Areas.

TO BE CONSISTENT WITH THE CARIBOU FOREST PLAN

Limit road building in IRAs [Inventoried Roadless Areas] for phosphate to existing leases and KPLA [Known Phosphate Lease Areas]. The Revised Forest Plan for the Caribou National Forest limits access (roads) into IRAs to phosphate ore in existing leases and/or leases granted in KPLAs. For consistency with [the] Revised Forest Plan, the proposed Rule should be modified to limit road building associated with phosphate mineral activities to existing leases and to the KPLAs. The Rule should also make it clear that modifications of existing leases in an IRA that are part of the KPLA are allowed. (Mining Industry/Association, Boise, ID - #1795.19.20000.423)

2-77 Public Concern: The Forest Service should allow expansion of only environmentally responsible phosphate mining.

BECAUSE THE INDUSTRY POLLUTES WATERSHEDS

My main concern with the proposal on the table is the expansion opportunity afforded to the Phosphate Mining industry that would generate 545 million tons of phosphate ore over the course of a 50+year period. It's not the mining I'm generally opposed to, but the poor track record of this industry to keep watersheds protected as part of the overall operation.

As reported in The Salt Lake Tribune last year, “[phosphate] mining continues to leach selenium into streams and the aquifer, while 17 Superfund sites from past mining go untouched. Mining for phosphate exposes rocks rich in selenium, which, once exposed to rain and snow, flows into streams and

underground aquifers. It can build up in plants, reaching high concentrations that can kill livestock and wildlife and harm the people who eat them.” (Individual, CO - #767.1.44210.243)

2-78 Public Concern: The Forest Service should require that selenium contamination be cleaned up.

TO PROTECT THE WATER OF LOCAL COMMUNITIES

We [Earthjustice] urge you to require existing selenium pollution to be cleaned up instead of approving more mining that would threaten the water of local communities. (Individual, #218.70.44210.241)

TO PROTECT FISH AND WILDLIFE

We [Earthjustice] urge you to require existing selenium pollution to be cleaned up instead of approving more mining that would threaten fish and wildlife with toxic contamination. (Individual, #218.71.44210.200)

2-79 Public Concern: The Forest Service should not expand the authority and discretion to issue leases on Roadless Areas.

BECAUSE THIS IS AN IRREVERSIBLE COMMITMENT OF RESOURCES

The permissive attitude toward mining activities allows for mining companies to acquire leases on these Federal lands and subsequently begin mining at some distant point in the future. This is an irreversible commitment of resources because there is no effective mechanism to prevent that activity once the lease is entered into. The Proposed Rule gives to the Secretary of Agriculture the additional authority and discretion to issue a lease in an IRA [Inventoried Roadless Area], where there is currently no authority to do so. The Tribes [Shoshone-Bannock] demand that the exceptions for phosphorous mining be immediately removed from any future document and deny the State’s Petition for Rule change and continue to implement the terms of the 2001 Rule. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.144.20000.420)

2-80 Public Concern: The Forest Service should close loopholes and enforce existing regulations regarding mining operations.

**BECAUSE COMPANIES HAVE NOT COMPLIED WITH ORDERS TO CLEAN UP
EARLIER ENVIRONMENTAL DAMAGE**

We are not confident that State and Federal government agencies have in the past or will in the future protect sensitive areas and enforce the regulations for responsible use. There are Superfund sites that exist now because of the very companies lobbying for this Rule change (i.e.: Simplot’s Smokey Mountain Mine etc.). They have been ordered to clean up their past messes but have not complied and yet are asking us to believe that it will all be different now if we give them, yes, just another chance to enlarge their mining areas. There have been loopholes by which industry has been able to delay and even evade their responsibility with regard to environmental cleanup. (Individual, Rigby, ID - #9105.4.10440.057)

2-81 Public Concern: The Forest Service should not allow the expansion of the Smokey Canyon Mine.

BECAUSE IT IS A SUPERFUND SITE

The Smoke Canyon Mine is already designated as a superfund site because it has poisoned streams, groundwater, soils, and vegetation. Expanding it would be extremely dangerous and could decimate local trap populations. (Individual, #218.69.44210.350)

2-82 Public Concern: The Forest Service should acknowledge that the language related to modifications in Section 294.24 is inconsistent with the stated intent of the State of Idaho and the Rule.

Section 294.24 allows for “modifications” associated with leases, contract, permits and associated activities authorized prior to the effective date of the Rule. The inclusion of “modification” as an allowable activity would authorize the expansion of existing leases. Expansion could proceed into areas proposed for Wildland Recreation, Primitive and SAHTS, as “nothing in this subpart shall be construed as expressly or implicitly restricting mineral leases...authorized prior to the effective date of the final rule.” This is inconsistent with the stated intent of the State of Idaho, the preamble, the Rule and the analysis. (Preservation/Conservation, Boise, ID - #4156.45.21000.400)

2-83 Public Concern: The Forest Service should ensure that the language of the Idaho Roadless Rule prohibits road construction in the Backcountry/Restoration management theme.

Section 294.24(d) states, “Surface use or occupancy without road construction or reconstruction is permissible for all mineral leasing.” At the same time, 294.24(c) states that road construction; reconstruction or surface occupancy is prohibited in Wildland Recreation, Primitive, and Special Areas of Historic or Tribal Significant (SAHTS) areas. If the intent is to allow surface use occupancy and prohibit road construction/reconstruction in Backcountry areas, the wording should be limited to Backcountry areas. (Preservation/Conservation, Boise, ID - #4156.44.21000.400)

2-84 Public Concern: The Forest Service should revise Section 294.24, Mineral Activities in Idaho Roadless Areas, to include requirements for public involvement and environmental analysis.

Section 292.25 specifically requires public involvement associated with logging in areas proposed for the General Forest designation. In contrast, similar language in section 294.23 does not specifically require public involvement. Instead, the language in that section, which deals with road construction, only requires the “necessary environmental analysis.” Section 294.23 should be amended in the final Rule to include similar language requiring public involvement. Similarly, section 294.24(f), which relates to mineral development in areas proposed for General Forest designation should include reference to both necessary environmental analysis and public involvement. (Preservation/Conservation, Boise, ID - #4156.47.21000.060)

Alternative Energy

2-85 Public Concern: The Forest Service should not allow exemptions for renewable energy projects in Roadless Areas.

Although a special exemption for geothermal energy resources is not included, the Department leaves the door open for changes in the rule’s restrictions (Federal Register, pp. 1139). According to a March 3, 2008 article by Post Falls Press staff writer, Sean Garmire, since a recent House bill seeks to open Idaho’s 2.46 million acres of endowment lands for renewable energy projects including creating energy from fuel cells, low-impact hydro, wind, geothermal, solar, landfill gas, biomass, or cogeneration, I oppose encroachment into the State’s Roadless Areas for those projects at any time. (Individual, #1475.7.44220.1)

2-86 Public Concern: The Forest Service should not encourage development of geothermal energy.

BECAUSE DEVELOPMENT WOULD IMPACT THE ENVIRONMENT

The Proposed Rule supports ‘open and unrestricted’ Geothermal Exploration and Development opportunities on 7% (630,000 acres) of the Roadless Area in the GFRG [General Forest, Rangeland, and

Grassland] theme, 660/0 of which is in Southern Idaho. Those lands open for geothermal development are environmentally sensitive and culturally significant lands for the Tribes. Idaho has high potential for geothermal development, in terms of potential sites for facilities. Conversely low is the capacity of Idaho's electrical infrastructure to deliver power from the facility. This fact evidences the probability that more transmission line 'right of ways' and easements will be necessary through the Roadless Areas to allow for this type of energy development. The Tribes oppose the permissive management in GFRG IRAs [Inventoried Roadless Areas] for the geothermal development Rule [because]: If energy developers are interested in geothermal power exploration and development, there are many other locations that are not located within the IRAs that would pose significantly less threat to the environment than these lands. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.62.44220.200)

BECAUSE DEVELOPMENT WOULD REQUIRE NEW ROADS, BUILDINGS, AND TRANSMISSION LINES

The Proposed Rule supports 'open and unrestricted' Geothermal Exploration and Development opportunities on 7% (630,000 acres) of the Roadless Area in the GFRG [General Forest, Rangeland, and Grassland] theme, 660/0 of which is in Southern Idaho. Those lands open for geothermal development are environmentally sensitive and culturally significant lands for the Tribes. Idaho has high potential for geothermal development, in terms of potential sites for facilities. Conversely low is the capacity of Idaho's electrical infrastructure to deliver power from the facility. This fact evidences the probability that more transmission line 'right of ways' and easements will be necessary through the Roadless Areas to allow for this type of energy development. The Tribes oppose the permissive management in GFRG IRAs [Inventoried Roadless Areas] for the geothermal development Rule [because]: Exploration and development of geothermal power is destructive and detrimental to the environment in IRAs. It would require building new roads that would pose a threat to wildlife access and migration, increase sedimentation along watercourses and other associated impacts. It would require permanent construction of buildings and transmission lines that would pose a threat to the flora and fauna in the IRA. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.63.44220.201)

BECAUSE DEVELOPMENT WOULD REQUIRE BUILDINGS, FENCING, AND SECURITY

The Proposed Rule supports 'open and unrestricted' Geothermal Exploration and Development opportunities on 7% (630,000 acres) of the Roadless Area in the GFRG [General Forest, Rangeland, and Grassland] theme, 660/0 of which is in Southern Idaho. Those lands open for geothermal development are environmentally sensitive and culturally significant lands for the Tribes. Idaho has high potential for geothermal development, in terms of potential sites for facilities. Conversely low is the capacity of Idaho's electrical infrastructure to deliver power from the facility. This fact evidences the probability that more transmission line 'right of ways' and easements will be necessary through the Roadless Areas to allow for this type of energy development. The Tribes oppose the permissive management in GFRG IRAs [Inventoried Roadless Areas] for the geothermal development Rule [because]: Development of geothermal power would require a building and for security reasons it would require fencing and 24 hour surveillance which is harmful to wildlife access, wildlife migration and movement, and would reduce the general public's access to trails and reduce scenic quality in the IRA. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.65.44220.002)

BECAUSE DEVELOPMENT WOULD REQUIRE TEST DRILL SITES

The Proposed Rule supports 'open and unrestricted' Geothermal Exploration and Development opportunities on 7% (630,000 acres) of the Roadless Area in the GFRG [General Forest, Rangeland, and Grassland] theme, 660/0 of which is in Southern Idaho. Those lands open for geothermal development are environmentally sensitive and culturally significant lands for the Tribes. Idaho has high potential for geothermal development, in terms of potential sites for facilities. Conversely low is the capacity of Idaho's electrical infrastructure to deliver power from the facility. This fact evidences the probability that more transmission line 'right of ways' and easements will be necessary through the Roadless Areas to allow for this type of energy development. The Tribes oppose the permissive management in GFRG IRAs [Inventoried Roadless Areas] for the geothermal development Rule [because]: Exploration of geothermal potential in these areas would require multiple test drill sites, which have negative environmental impacts in the IRA. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.64.44220.200)

Recreation

2-87 Public Concern: The Forest Service should revise the Idaho Roadless Rule to ensure that motorized recreational access will not be limited.

Many of our members and supporters live in and/or recreate in Idaho and use motorized vehicles, including off-highway vehicles, to access Forest Service managed lands throughout Idaho, including many of the Roadless Areas at issue. In addition to access travel itself, BRC [Blue Ribbon Coalition] members visit the lands mentioned herein for motorized recreation, sightseeing, photography, rockhounding, hunting, wildlife and nature study, camping and other similar pursuits. Blue Ribbon's members and supporters have concrete, definite and immediate plans to continue such activities in the future. BRC generally supports the Proposed Action, herein referred to as the Proposed Idaho Roadless Rule. We particularly caution against application of the Rule (or the supporting documents) to argue against recognition of existing recreational access to Idaho Roadless areas in ongoing travel management. In short, if the "Idaho Roadless Rule" is not going to include a recreation component, it must be truly "neutral" regarding recreational use, and the absence of recreation-specific analysis shall not be used by anti-access interests as "evidence" against designation of routes in future travel planning. (Organization, #1801.1.20000.500)

2-88 Public Concern: The Forest Service should leave travel management and regulation of recreation activities in National Forests to forest travel and management plans.

The proposed Rule does not appear to contain any direct restrictions on off-highway vehicle ("OHV") or other motorized or non-motorized recreation travel and other dispersed recreation activities. Proposed 36 C.F.R. 294.26(a). The Final Rule likewise should leave travel management and other regulation of recreation activities in roadless as well as roaded National Forest areas to existing and future forest travel and general management plans. (Regional/other governmental agency (multi-jurisdictional), Boise, ID - #6545.9.22300.500)

2-89 Public Concern: The Forest Service should remove references to recreation in the definitions of Backcountry/Restoration and General Forest themes.

In section 294.21 definitions of Backcountry/Restoration and General Forest themes refer to "a variety of recreational opportunities" and "a broad range of recreational opportunities," respectively. The definitions section of the final Rule should drop any such references. (Preservation/Conservation, Boise, ID - #4156.33.21000.600)

2-90 Public Concern: The Forest Service should allow motorized vehicles larger than 50 inches wide on National Forest lands.

I support the Rule and process. If we go ahead with this Rule, it will achieve something that I find very important. It protects the backcountry and primitive character of Roadless Areas that we now all enjoy. We often take road access to certain areas and pack from there and recreate in that same way.

Yet it [the Idaho Rule] acknowledges that motorized recreation can and does occur stating that neither the 2001 Roadless Rule nor the Idaho Roadless Rule provides direction on where and when OHV use would be permissible in Roadless Areas. Therefore, there would be no effect on the current OHV use in Roadless Areas.

The DEIS and draft [Rule] will fail to state the types of recreation that could occur and the various theme areas as specified in this particular petition.

The petition stated for Wildland Recreation preserves currently existing routes and class vehicle. Further limitations subject to National Forest travel planning. For the Primitive designation, a variety of motorized and non-motorized recreation opportunities exist.

It [access] is restricted to snowmobiles and motorized vehicles less than 50 inches and can change the class of vehicle and designation of routes is permissible subject in the National Forest travel planning.

We use vehicles that are larger than 50 inches in width and we want to have that ability to continue to do so. (Motorized Recreation, Idaho Falls, ID - #9227.1.21000.530)

Coordination with other Agencies, Tribes, and Local Governments

2-91 Public Concern: The Forest Service should ensure that the obligation to consult with Native American Tribes is codified in the Idaho Roadless Rule.

Recognizing the Federal government's continuing obligation to consult with the Kootenai Tribe prior to making decisions that may impact Tribal rights or interests, the Kootenai Tribe suggests the following addition to [Section] 294.27:

[insert] (g) This subpart does not modify the unique relationship between the United States and Indian Tribes that requires the Federal government to work with Federally recognized Indian Tribes on a government-to-government basis and strongly support and respect Tribal sovereignty and self-determination. Nothing herein limits or modifies prior existing Tribal rights, including federally-reserved hunting, fishing and gathering rights. [insert] (Tribal Government/Elected Official/Agency, Bonners Ferry, ID - #227.3.31000.040)

2-92 Public Concern: The Forest Service should ensure that the Idaho Roadless Rule will not affect Treaty rights.

BECAUSE SEVERAL ROADLESS AREAS ARE WITHIN ORIGINAL RESERVATION BOUNDARIES

The original boundary for the Fort Hall Reservation has been modified through a series of land cessation agreements to its current size, which the Tribes [Shoshone-Bannock] reserved certain rights, in addition to those rights guaranteed by the Treaty [Fort Bridger Treaty of 1868], to ceded lands that remain part of the public domain [Footnote 5: "So long as any of the lands ceded, granted, and relinquished under this treaty remain a part of the public domain, Indians belonging to the above mentioned Tribes (Shoshone-Bannock Tribes), and living on the reduced reservation, shall have the right, without any charge therefore, to cut timber for their own use, but not for sale, and to pasture their live stock on said public lands, and to hunt thereon and fish in the streams therefore." (31 stat 672, Article IV)] Several of the Inventoried Roadless Areas (IRAs) are within that original reservation boundary and thus subject to the terms of those particular cessation agreements. The Tribes continue to utilize the IRAs within the original boundaries of the reservation for Treaty Rights and traditional cultural practices. The Proposed Rule will impact Tribal rights and interests in those IRAs and does not adequately address the nature and scope of those impacts. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.23.20000.150)

2-93 Public Concern: The Forest Service should provide the highest level of protection for the Roadless Areas within the ceded lands of the original Fort Hall Indian Reservation.

BECAUSE THESE AREAS ARE CRITICAL TO TRIBAL TRUST RESOURCES

There are nine Roadless Areas that will be affected by the proposed Rule that are within the ceded lands of the original Fort Hall Indian Reservation. These areas are: Toponce, West Mink Creek, Scout Mountain, North Pebble, Bonneville Peak, Elkhorn Mountain, Oxford Mountain, Deep Creek and a portion of Clarkston Mountain; each of these IRAs [Inventoried Roadless Areas] would be open to development by a designation as GFRG [General Forest, Rangeland, and Grassland]. These IRAs are critical to Tribal trust resources by providing for the survival of wildlife, ensuring maintenance of biological diversity, watershed health and preserving significant cultural sites. The 2001 Rule guaranteed that these areas would not see future development. The designation of GFRG in the proposed Rule endangers the integrity of those areas for a myriad of ecological, historical and cultural components. The Tribes [Shoshone-Bannock] demand that the highest level of protection be provided for these IRAs

within the ceded lands of the original reservation. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.36.20000.760)

2-94 Public Concern: The Forest Service should coordinate with the County Commissions in Teton and Lincoln Counties.

BECAUSE ROADLESS AREAS CROSS OVER INTO WYOMING COUNTIES

We [Idaho Conservation League] encourage you to work with the commissioners in Teton and Bonneville to ensure consistent management of these important areas [Garns Mountain IRA (Inventoried Roadless Area) in Madison County]. Because the Roadless Areas cross into Wyoming, we urge you to work with the commissioners in Teton and Lincoln Counties. (Preservation/Conservation, Boise, ID - #4156.719.10200.030)

Compliance with Existing Laws, Regulations, and Policies

2-95 Public Concern: The Forest Service should revise the Idaho Roadless Rule to be consistent with the National Forest Management Act.

BECAUSE THE IDAHO ROADLESS RULE WOULD WRONGLY SUPERSEDE LAND AND RESOURCE MANAGEMENT PLAN PRESCRIPTIONS

The Rule is not consonant with NFMA's [National Forest Management Act] requirement that LRMPs [Land and Resource Management Plans] govern management activities on the forest. In addition to the [Nez Perce] Tribe's concerns with respect to the Rule's purpose and need, the Tribe is also very troubled to see that the Rule seeks to supplant existing management standards and guidelines developed under the National Forest Management Act (NFMA), 15 U.S.C. §§ 16001614 (1976). According to the DEIS, regulations established under the Rule "would supersede Forest Plan direction and cannot be changed by Forest Plans. Therefore, future projects to implement the Forest Plan in Roadless Areas would be required to be consistent with the Rule." DEIS at § 2.4, pg. 58 (emphasis added). In a staff-to-staff meeting with the Tribe in February, 2008, The Tribe asked the Forest Service to clarify this statement with respect to current Forest Plan direction provided for under the existing LRMPs. The Forest Service responded that in drafting the Rule, it endeavored to, apply the proposed management theme that most appropriately reflects the existing Forest Plan direction under the LRMPs. Any inconsistencies, the Forest noted, would be resolved in favor of the Rule's direction. Thus, inconsistent current and future direction provided for under the LRMPs would necessarily yield to the Rule. (Government, #1819.20.22113.160)

BECAUSE THE IDAHO ROADLESS RULE CONFLICTS WITH CONGRESSIONAL INTENT

Prohibiting direction to be changed by Forest Plans changes that are "inconsistent" with the Rule is at odds with Congress' intent in enacting NFMA [National Forest Management Act]. Congress provided clear direction for management of activities on National Forest lands, requiring the Forest Service to develop Land and Resource Management Plans (LRMPs) to govern all activities on a forest. These LRMPs were to be developed with extensive public involvement provided under NEPA. The Tribe has provided extensive input over the years into the development of the LRMPs for several forests within the ceded territory. Many of the standards and guidelines existing on these forests reflect the Tribe's and Forest's ongoing efforts to ensure that habitat on NFS [National Forest Service] lands within the ceded territory is maintained to provide for protection and perpetuation of the Tribe's treaty reserved interests. (Government, #1819.21.22113.130)

2-96 Public Concern: The Forest Service should ensure that conflicts over access under the Mining Law of 1872 are resolved expeditiously.

TO FACILITATE EXPLORATION ACTIVITIES

We have also identified a problem for which clarification in the Proposed Rule is appropriate. Based on our experience, the U.S. Forest Service has not been responsive in a timely fashion with respect to the

resolution of conflicts over access issues involving entities that have statutory rights under the General Mining Law of 1872, 30 U.S.C. §§ 21 et seq., and the 1897 Organic Act, 16 U.S.C. §§ 478 et seq. This problem with federal responsiveness on access issues involving Idaho miners and Idaho roads can impair the ability of small companies to conduct potentially fruitful exploration activities because the time for resolution can extend for months, sometimes years, and certainly more than one season. (Organization, #1822.4.22117.840)

2-97 Public Concern: The Forest Service should ensure that the Idaho Roadless Rule includes language to ensure compliance with the Mining Law of 1872.

Ivy Minerals is concerned about the effect of the Proposed Rule on Ivy Minerals' rights to explore, mine and process minerals pursuant to the General Mining Law of 1872, 30 U.S.C. §§ 21 et seq., and the 1897 Organic Act, 16 U.S.C. §§ 478 et seq. Ivy Minerals recognizes and appreciates the Proposed Rules' intent to ensure the rule creates no limitations on these rights. In particular, page 1140 of the Federal Register Notice explaining the Proposed Rule states: [T]his proposed Rule does not seek to impose any limits regarding activities undertaken regarding locatable minerals. When necessary, construction or reconstruction of roads for locatable mineral exploration is part of the reasonable right of access provided under the General Mining Law. Therefore, this rule does not propose to affect rights of reasonable access to prospect and explore lands open to mineral entry and develop valid claims. FR, Vol. 73, No. 4 (January 7, 2008). This statement is reflected in the Proposed Rule under subsection 294.24 "Mineral activities in Idaho Roadless Areas" with the following language: "Nothing in this subpart shall affect mining activities conducted pursuant to the General Mining Law of 1872." Although this language is helpful, we believe further clarification is necessary to adequately protect the rights of miners. From our experience with the Forest Service in the Payette National Forest, Forest Service personnel often are not aware of the rights afforded to miners under the 1872 Mining Law, and the Proposed Rule provides an opportunity for needed clarification.

Under the Code of Federal Regulations ("C.F.R."), a miner may prospect for locatable minerals using roads declared "unauthorized" without first obtaining pre-approval or submitting a Notice of Intent to operate from the U.S. Forest Service so long as the miner does not cause any significant surface disturbance. 36 C.F.R. Section 228.4(a)(1)(ii) specifies that a notice of intent for operations is not required for: Prospecting and sampling which will not cause significant surface resource disturbance and will not involve removal of more than a reasonable amount of mineral deposit for analysis and study which generally might include searching for and occasionally removing small mineral samples or specimens, gold panning, metal detecting, non-motorized hand sluicing, using battery operated dry washers, and collecting of mineral specimens using hand tools. 36 C.F. R. §228.4(1)(ii). Furthermore, Notices of Intent to operate are not required for "(iv) Underground operations which will not cause significant surface resource disturbance" and "(v) Operations, which in their totality, will not cause surface resource disturbance." 36 C.F.R. §228.4(1)(iv),(v). Based on the C.F.R., the "requirement to submit a plan of operations shall not apply to operations listed in paragraphs (a)(1)(i) through (v)." 36 C.F.R. §228.4(3). Language in subsection 294.24 of the Proposed Rule concerning minerals for lease (which deals with minerals that are not covered by the General Mining Law of 1872) expressly precludes the use of the Proposed Rule to restrict "mineral leases, contracts or permits, and associated activities." This language includes an explanatory parenthetical: "(including, but not limited to, access and road construction or reconstruction, surface use, and occupancy)." This same type of explanation is necessary following the sentence on the General Mining Law of 1872 to clarify that the exploration rights of miners will not be affected by the Proposed Rule. We propose the following addition (indicated by the underlined text): Nothing in this subpart shall affect mining activities conducted pursuant to the General Mining Law of 1872, [emphasis] including, but not limited to, access and road construction or reconstruction, surface use, and occupancy associated with the exploration, mining and processing of minerals and exploration activities that do not involve a significant disturbance of surface resources. [emphasis] (Mining Industry/Association, #1822.1-3.22117.160)

2-98 Public Concern: The Forest Service should not implement the Mining Law of 1872 in Roadless Areas.

TO ENSURE ADEQUATE PROTECTION OF ROADLESS AREAS

Mineral Activities. I emphatically oppose implementing the General Mining Law of 1872 (which should be examined and updated) in the Roadless Areas. Federal Register, pp. 1140 states, "In the long term, it is reasonable to assume that future exploration, mining, and mineral processing activities would continue to occur in Idaho Roadless Areas where valuable deposits exist. When necessary, construction or reconstruction of roads for locatable mineral exploration or development is part of the reasonable right of access provided under the General Mining Law. Therefore, this rule does not propose to affect rights of reasonable access to prospect and explore lands open to mineral entry and develop valid claims." Additionally, the Mineral Leasing Act of 1920 and the Mineral Leasing Act for Acquired Lands appear to provide the government with unbridled authority and discretion to authorize all mineral extraction including sand, stone, gravel, pumice, pumicite, cinders, clay, oil, gas, coal, phosphate, potassium, sodium, sulfur, gilsonite, oil shale, geothermal resources, and hard rock minerals. Given the lack of environmental conscience of the Bush Administration and the efforts made to ignore and dismantle environmental safeguards, the language throughout this section not only does not prohibit or safeguard the Roadless Area from the absolute destruction by these activities, including road building, it specifically allows them which means "Roadless" would no longer apply to vast areas of the state! Further, the Federal Register, pp. 1141 regarding phosphate leasing in the Caribou-Targhee National Forest specifically states, "At the effective date of a final rule, existing operations could expand beyond their current boundaries, including such lands as are necessary for access. The DEIS (Draft Environmental Impact Statement) also discusses the importance and value of this phosphate leasing to the local communities, the State, and the Nation." (Individual, #1475.8.44000.200)

2-99 Public Concern: The Forest Service should comply with the Comprehensive Environmental Response, Compensation, and Liability Act.

BECAUSE CURRENT MINING REMEDIATION EFFORTS MIGHT BE AFFECTED BY THE IDAHO ROADLESS RULE

The Proposed Rule would allow for the possible exploitation of minerals and development of new mineral sites on all 609,000 acres under the GFRG [General Forest, Rangeland, and Grassland] classification.

The CTNF [Caribou-Targhee National Forest] in Southern Idaho are the target for mineral exploitation. The maps provided reveal that one section of the Caribou portion of the CTNF will be opened for mineral exploitation and associated road building. In spite of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) remediation efforts and contaminated watersheds, this proposed Rule will allow for future expansion of phosphate mining activities for generations to come [Footnote 29: There are dozens of retired mines and at least three active superfund sites declared to be a public health emergency that have contributed to the contamination of the Blackfoot and Salt River drainages]. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.70.22100.423)

2-100 Public Concern: The Forest Service should preserve Revised Statute 2477 rights-of-way.

There are areas within Valley County that have historic rights-of-way that even this document cannot change. Only by an act of Congress may these historic rights be removed from the land. These right-of-ways are quite commonly called RS 2477 routes as they predated the preservation of the National Forest and provided the needed access for the public to reach their property, mining claims, post offices, homes, ranches, villages, etc. (County Government Agency/Elected Official/Association, Cascade, ID - #7990.2.22110.680)

On July 26, 1866, as part of a move to grant access to western lands, the United States Congress enacted the 1866 Mining Act, section 8 of which granted a right-of-way to all persons over unreserved Federal lands when it stated "the right-of-way for the construction of highways over public lands, not reserved

for public uses, is hereby granted.” In 1873, the 1866 grant was re-codified into section 2477, Revised Statute of the United States, and rights-of-way granted by that section have since become known as the “RS 2477 rights-of-way.”

Throughout the latter half of the 19th century and the first three-quarters of the 20th century, the use of “RS 2477 rights-of-way” over Federal land in the western United States became a standard method of legal access across Federal lands for commercial, industrial, and recreational pursuits to such an extent that the use of RS 2477 rights-of-way has become an inherent part of western heritage and a capital asset for the public that should be preserved for future generations. (Motorized Recreation, Helena, MT - #168.217.22110.740)

2-101 Public Concern: The Forest Service should consider the Snake River Policy in drafting the Final Idaho Roadless Rule.

The Tribes have established the Snake River Policy.

“The Shoshone-Bannock Tribes (Tribes) will pursue, promote, and where necessary initiate efforts to restore the Snake River systems and affected unoccupied lands to a natural condition. This includes the restoration of component resources to conditions, which most closely represents the ecological features associated with a natural riverine ecosystem. In addition, the Tribes will work to ensure the protection, preservation, and where appropriate-the enhancement of rights reserved by the Tribes under the Fort Bridger Treaty of 1868 (Treaty) and any inherent aboriginal rights.”

The Tribes drafted this policy because the Snake River Basin provides substantial resources that sustain the diverse uses of native Indian Tribes, including the Shoshone-Bannock. A natural riverine ecosystem provides for the continuation of the unique cultural heritage of the Shoshone and Bannock people. Utilizing fisheries or hunting and gathering areas allows for present day Tribal members to practice the traditional life way, reconnect with the cultural landscape, riverine environment and ancestral lands. The Tribes request that the FS take the Snake River Policy into consideration when drafting a decision on the Proposed Rule. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.33.10400.760)

2-102 Public Concern: The Forest Service should comply with the Northern Rockies Ecosystem Protection Act.

As a longtime proponent of NREPA [Northern Rockies Ecosystem Protection Act], I must strongly insist that no part of any Forest Plan be implemented that would compromise land that NREPA will protect. Since Idaho is part of the Northern Rockies ecosystem, any plan for management of the Roadless Areas in Idaho must be consistent with the science and economics of NREPA. (Individual, #1828.13.22100.100)

I’m asking our government to adopt the Northern Rockies [Ecosystem] Protection Act. (Individual, #218.8.22100.1)

Change Clause

2-103 Public Concern: The Forest Service should revise the mechanism for corrections and modifications.

TO CLOSE LOOPHOLES THAT WOULD ALLOW MINING AND LOGGING IN ROADLESS AREAS

The proposed mechanism for administrative corrections and modifications are loopholes designed to accommodate future requests by industry to mine or log in the so-called “roadless” areas. The changes should be specific to “public need” only, not open to industry to take advantage of the loopholes in the proposed Rule. (Individual, #308.14.21000.127)

**TO ENSURE THAT THE PROVISION WILL NOT ALLOW FOR A STEADY
EROSION OF ROADLESS LANDS AND VALUES**

The Forest Service queries: Will the proposed mechanism for administrative corrections and modifications be sufficient to accommodate future adjustments necessary due to changed circumstances or public need? We do not believe that this is the case with respect to roadless characteristics. Rather, we fear that the proposed mechanism will allow for a steady erosion of roadless lands and roadless values through incremental administrative elimination of protections on roadless lands. Roadless lands are inventoried and finite, and any process to carve off portions of roadless land for development tends to run contrary to the interests of the human-powered outdoor community. (Organization, #1821.25.20000.620)

TO FACILITATE CHANGES THAT ARE NEEDED TO PROVIDE SAFETY AND REDUCE FOREST FIRES

Are the proposed mechanisms for administrative corrections and modifications sufficient to accommodate future adjustments necessary due to changed circumstances or public need? Perhaps, would be my answer if it could be in a more perfect, less litigious world, but that is not the current situation. This treatment of Roadless Areas is views as the last stand for a number of environmental groups over a number of areas of land. They plan to formulate protection for as much near-wilderness as possible without congressional action. Both the Clinton Rule and the Idaho Rule formalize the process so that sufficient management obstacles exist or are developed, therefore, little change will occur without a judicial hemorrhage. I believe most of the language is so confining that changes which are needed to help humans, wildlife, air, water or land will not be accomplished in anything resembling a timely fashion. The lack of ability to change something, or to carry out even minor actions such as roads and timber cutting, that protects humans and other important elements in the ecosystem, will prove to be too contentious and time consuming for an Agency plagued by budget and personnel problems. The great changer, wildfire, will remain the essential influencer especially as long as it is funded the way it is and expectations of control actions are limited. People just have to be advised that they should expect summers filled with wild land fire smoke and an agency short on budgets to accomplish most tasks of management not involving fire. (Individual, #762.6.20000.23)

TO INCREASE THE REVIEW PERIODS AND FACILITATE PUBLIC OVERSIGHT AND INPUT

Will the proposed mechanisms for administrative corrections and modifications be sufficient? The proposed mechanisms do not require sufficient public oversight and input nor do they allow for proper and timely appeal processes. The notification and response time for public input are too short. (Individual, Mccall, ID - #1807.15.12000.001)

2-104 Public Concern: The Forest Service should ensure that a mechanism for public involvement is included for any changes.

The preamble requests comments on the “change clause.” We [Idaho Conservation League] support the development of a clear and consistent process to provide for future modifications to Idaho Roadless Areas, as long as a mechanism for public involvement is included for any changes. This would include perceived non-significant changes, modifications, correction of technical errors, and map amendments, regardless of the magnitude of any proposed change. (Preservation/Conservation, Boise, ID - #4156.61.12000.160)

2-105 Public Concern: The Forest Service should close loopholes created by the mechanism for corrections and modifications.

**BECAUSE CHANGES SHOULD BE SPECIFIC TO “PUBLIC NEED” ONLY,
NOT TO EXPLOITATION BY INDUSTRY**

The [Idaho] Rule is structured under five themes, but immediately the state condones one of many loopholes in the document by the statement, “Furthermore, when appropriate, wild land fire and prescribed fire are tools which would be available across all themes.” Here the state can issue logging permits based on the HFRA [Healthy Forest Restoration Act] in any of the five theme areas based on this pretense. There is no place a road can’t go and logging can’t take place. (Individual, #308.5.21000.720)

The Idaho Rule claims “imminent threat” in the original [2001] Rule is regulatory language that “may not always achieve the State’s desire for more progress toward the congressional goals identified in HFRA [Healthy Forest Restoration Act].” Again, this is Idaho’s terminology to allow road building, industrial logging and mining activities to increase in the present Roadless Areas. The rule also opens the door to unlimited loopholes to authorize logging by adding the following: “this provision also contemplates access for (1) areas where wind throw, blow down, ice storm damage, or the existence or imminent threat of an insect or disease epidemic is significantly threatening ecosystem components or resource values that may contribute to significant risk of wild land fire; or (2) areas where wild land fire poses a threat to, and where the natural fire regimes are important for, threatened and endangered species or their habitat consistent with HFRA.” (Individual, #308.7.21000.720)

2-106 Public Concern: The Forest Service should require a 30-day comment period for changes.

The Rule should require a minimum 30-day public comment period for any changes, including corrections, modifications, or changes, regardless of their purported significance. (Organization, #262.1.12200.1)

2-107 Public Concern: The Forest Service should reconsider excluding a change in the classification of an area from a more protective to a less protective management theme from the formal notice and rulemaking process.

BECAUSE THE CURRENT EXCLUSION WOULD ALLOW EXPANSION OF THE GENERAL FOREST MANAGEMENT THEME AND DOES NOT ADEQUATELY PROVIDE FOR REQUIRED TRIBAL CONSULTATION

Examples of when rulemaking would not be expected: (1) establishment by the Forest Service of a Research Natural Area in a Roadless Area designated as Primitive; (2) changing the designation of a small portion of Backcountry adjacent to a large block of GFRG into the GFRG designation; (3) changing the designation of a small portion of Backcountry adjacent to a large block of Primitive into the Primitive designation.

The Tribes [Shoshone-Bannock] note that the changing of designations from more protective to less protective will not trigger the formal notice and comment rulemaking process. This is a significant shift of power away from the public to the Agency and could result in serious backsliding of protections for IRAs [Inventoried Roadless Areas]. The Proposed Rule builds in a categorical exclusion for the designation of ‘small’ portions of forests without considering the alternatives or allowing for public input on the significance of that ‘small’ portion. This would allow for a potential expansion of GFRG [General Forest, Rangeland, and Grassland] acres beyond the 600,000+ acres already subject to the Proposed Rule. The Tribes expect that the FS [Forest Service], as required by Federal policy on government-to government consultation and established protocol with the FS, engage the Tribes in meaningful consultation prior to making decisions that could impact the exercise of Treaty rights by Tribal members. The text of the Proposed Rule does not adequately provide the opportunity to engage in meaningful Tribal consultation or submit comments to changes in management themes and therefore, should be denied. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.96.20000.040)

2-108 Public Concern: The Forest Service should ensure that the change clause allow for removal of areas erroneously inventoried as Roadless and updates reflecting project-level authorization of allowed activities.

The proposed Rule provides for “administrative corrections” to the Roadless Area maps at any time, effective upon public notice. Proposed 36 C.F.R. 294.27(e)(1). The Final Rule should expressly include under this provision: 1) corrections to areas erroneously identified and inventoried as “roadless” when they in fact contain substantial roads existing at the time the Final Rule is issued; 2) updates to reflect project level authorization of activities that are not prohibited by the Final Rule in an area, and which have themselves been the subject of applicable NEPA and forest planning environmental review, public

notice and comment—for example, a land exchange. The Final Rule should maintain the flexibility in the proposed Rule for modifications through notice and comment rulemaking based on changed circumstances and public need. (Regional/other governmental agency (multi-jurisdictional), Boise, ID - #6545.11.20000.002)

2-109 Public Concern: The Forest Service should ensure that revisions of boundary lines and themes can be made easily.

TO CORRECT FOR THE POOR DATA USED TO IDENTIFY BOUNDARIES

The revision of boundary lines for themes and Roadless Areas needs to be accomplished much more easily than currently proposed. This must be done because of the poor ground truth and examination accomplished by the many forests short of budget and with personnel problems. For example many of the Roadless Areas have fringe type peninsulas, or difficult to administer and defined boundaries. Simple administrative adjustments procedures should be allowed by the Forest Service. This should occur primarily in areas identified as backcountry themes. Peninsulas that fall outside the predominant watershed of the land base of the watershed area in primitive areas should also be administratively corrected. (Individual, #762.10.63000.800.400)

2-110 Public Concern: The Forest Service should ensure that boundaries are defined by the physical features of the area.

It must be made very clear how boundaries can be changed. Boundaries of Roadless Areas should have the same ease of management identification applied to them as is proposed by Forest Service of Wilderness Areas. In other words the ability to determine the boundary location by managers and others should be clear. That should mean that peninsulas, islands and other forms of incursions should have their boundaries defined by recognizable features as topography, or obvious well-established man-made features that have stability. Boundaries that require GPS coordinates to determine the boundary line should not be acceptable. (County Government Agency/Elected Official/Association, Council, ID - #2364.13.31000.620)

2-111 Public Concern: The Forest Service should clearly define what constitutes an administrative correction.

Administrative corrections need to be more clearly spelled out by; what they are, what may entail, if they include legal changes executed under other legal procedures, and historical information that are supported in law. (Individual, #762.12.20000.160)

2-112 Public Concern: The Forest Service should clearly define both the qualifications for each theme and the procedure for changing the management theme classification.

The qualifications for each theme should be clearly spelled [out] and the procedure for changing the theme level for non-qualification should be a clear administrative process. (County Government Agency/Elected Official/Association, Council, ID - #2364.11.31000.600)

2-113 Public Concern: The Forest Service should clearly define “non-significant modification.”

At page 60 of the Roadless Plan DEIS there is an indication that themes of management applied to an area can be changed due to circumstances. If this plan is codified there is already a specific set of procedures and rulemaking alteration that it would fall under. It appears that there has been an additional standard applied for a “non-significant modification.” I suggest that this be more clearly defined or the rule be specifically developed for the public to review and respond to. (Individual, #760.21.31000.600)

2-114 Public Concern: The Forest Service should limit administrative changes to significant events that require timely response.

There is a definite need to have some capability to modify or correct situations or conditions that were not evident at the time of enactment so themes or portions of [an] area's theme can change without use of the procedure described in the proposed regulations. For example several significant items associated with natural events that are not able to be forecast such as climate change, major fires and unusual weather events such as tornados may need major restoration and recovery efforts that need timely response. These situations need to be alluded to and rule set aside could be acceptable under some sort of FEMA authority. It is important that numerous extraneous reviews not be conducted unless they accelerate the actions of regulatory change outlined in the law. I would prefer that change be accomplished much like a Forest Plan amendment. (Individual, #762.9.23100.160)

2-115 Public Concern: The Forest Service should fully vet any changes that would decrease Roadless Area boundaries through the formal rulemaking process.

BECAUSE SUCH CHANGES ARE SIGNIFICANT AND DESERVE CAREFUL CONSIDERATION

Administrative Flexibility to Change Theme Designations is Not Appropriate Considering the Ecological Characteristics of Roadless Areas The IRR would allow the Chief of the USFS to eliminate Inventoried Roadless Areas for a wide array of reasons - with no oversight or meaningful opportunities for public involvement. The process is based on an "admittedly subjective assessment." [Footnote 10: Id. 73 Federal Register at 1141] Outdoor Alliance believes that any boundary changes that would decrease Roadless Area boundaries or values should be fully vetted with the public through a formal rulemaking process. Boundary changes that further and irreversibly shrink the finite amount of roadless lands are no small matter, and deserve great caution and careful consideration (Organization, #1821.22.20000.131.)

Other Considerations

2-116 Public Concern: The Forest Service should protect and manage every watercourse in Roadless Areas.

**TO ENSURE THAT HEALTHY WATERSHEDS ARE MAINTAINED AND
TO COMPLY WITH THE CLEAN WATER ACT**

The proposed Rule fails to disclose the extent of CWA [Section] 303-(d) streams/rivers in the IRAs [Inventoried Roadless Areas] and the impact of additional soil disturbing activities around these sensitive watercourses. [Footnote 22: Draft Integrated report from Idaho Department of Environmental Quality regarding CWA § 303(d) listed streams in Idaho. The report lists the streams in Idaho that are listed in the non-attainment for various reasons. The report can be accessed on-line and needs to be included in the analysis so that each Roadless Area receives due consideration prior to designation.

http://www.deq.state.id.us/water/data_reports/surface_water/monitoring/integrated_report_2008_seeS.PDF]. This Proposed Rule must institute high levels of protection and management of every watercourse originating or flowing through an IRA. Some watercourses are designated as 'forest special plan areas', not subject to the requirements of the Roadless Rule, because of other Federal legislative protection. A purpose of the Proposed Rule is to protect maintain a healthy watershed in IRAs. It is reasonable to request that all riparian areas in an IRA be given the highest protection. The 2001 Rule protects watercourses and is the Tribes [Shoshone-Bannock] preferred management alternative. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.50.20000.243)

2-117 Public Concern: The Forest Service should consider prescribing the use of vegetative buffers.**BECAUSE VEGETATIVE BUFFERS WOULD REDUCE LOSS OF SOIL**

Timber cutting [in the Proposed Plan] would reduce the percentage of precipitation that would have been intercepted and evaporated before hitting the soil. This would increase runoff amounts. Maybe vegetative buffers could be planted along streams close to roads or timber cutting, but this has not been discussed nor required. Such vegetative buffers would reduce the amount of soil particles and nutrients in the runoff water. It will also slow down the runoff entering into the streams. (Individual, #1812.18.20000.261)

2-118 Public Concern: The Forest Service should ensure that core population areas for gray wolf are buffered from human populations and livestock centers.**TO REDUCE CONFLICTS WITH WOLVES**

The State of Idaho's Department of Fish and Game is proposing to assume management of the currently ESA listed Gray wolf population after it is de-listed. Part of that plan calls for backcountry and Wilderness areas to act as source or core population areas to maintain wolves. It appears that the Idaho Roadless Plan goes a long way toward moving these formally identified potential core areas closer to human populations and livestock centers that may assure wolf conflicts. It would be appropriate to address this potential problem. (Individual, #760.16.20000.340)

2-119 Public Concern: The Forest Service should not defer to the Healthy Forests Restoration Act in determining Wildland-Urban Interface boundaries.**BECAUSE SOME COUNTIES HAVE INCLUDED THE ENTIRE COUNTY IN THE WILDLAND-URBAN INTERFACE**

The proposed Rule defers to the language within the Healthy Forests Restoration Act in regard to the Wildland-Urban Interface (WUI) and the issue of fire protection. This is problematic, as HFRA allows for individuals Community Wildfire Protection Plans (CWPP) to identify their WUI boundaries. In some CWPPs, counties have identified their WUI to contain the entire county. (Preservation/Conservation, Spokane, WA - #1799.27.20000.260)

2-120 Public Concern: The Forest Service should work with the State to ensure that no Roadless Areas in Boundary County are contained within the Wildland-Urban Interface.**BECAUSE THESE AREAS OFFER NO HARM TO COMMUNITIES**

The designated WUI [Wildland-Urban Interface] in Boundary County is adverse to the general direction of "areas adjacent to homes and communities." It includes lands surrounding both the entire Kootenai valley and the Moyie River valley. It includes the Kootenai Peak, Selkirk Mountain, Buckhorn Ridge, and Hellroaring IRAs [Inventoried Roadless Areas] in Boundary County. Most IRAs in Boundary County are well within the National Forest boundaries, and generally at higher elevations. This is a blatant device to allow "management" in areas that offer no harm to communities. The State should encourage the County to be more specific in the WUI designation. At the very least, no IRA in Boundary County should be contained within the WUI. It is incomprehensible that the WUI could be established based on the fear of wildfire and there is not an associated fire plan in place to allow high elevation areas to burn naturally. (Individual, Marquette, MI - #8022.2.10440.263)

2-121 Public Concern: The Forest Service should not restrict access to grazing allotments.

The proposed Rule does not appear to contain any direct restrictions on grazing allotments or other activities. Proposed 36 C.F.R. 294.26(b). The Final Rule should likewise avoid restricting such

activities beyond general limits on road construction and reconstruction in IRAs. (Regional/other governmental agency (multi-jurisdictional), Boise, ID - #6545.10.20000.810)

2-122 Public Concern: The Forest Service should maintain species population viability.

TO COMPLY WITH THE NATIONAL FOREST MANAGEMENT ACT

The NFMA [National Forest Management Act]and its implementing regulations require the Forest Service “to maintain viable populations of existing native and desired non-native vertebrate species in the planning area.” Because of the potential impact of authorizing development in habitats for threatened, endangered, management indicator and sensitive species, we [Idaho Conservation League] do not feel that the draft Idaho Rule would maintain population viability. (Preservation/Conservation, Boise, ID - #4156.109.20000.355)

2-123 Public Concern: The Forest Service should not reduce protection for the Lochsa Face, the North Lochsa Slope, and Weir-Post Office Creek.

BECAUSE OF THEIR RELATIONSHIP TO THE WILD AND SCENIC LOCHSA RIVER

The Lochsa Face’s proximity to the Lochsa river is reason enough to preserve this area in perpetuity. The river is designated a Wild and Scenic River mostly due to its purity and its beauty, both of these factors being preserved by the adjacent Roadless Areas. The headwaters for the Lochsa originate in several Roadless Areas in which protection will be reduced under the Idaho Plan. The reduction of protection for the Lochsa Face, the North Lochsa Slope, and Wier-Post Office Creek is highly questionable and would degrade the quality of the Lochsa River both scenically and through the degradation of water quality. The North Lochsa Slope alone boasts numerous forests types and elevation ranges that make it ideal for hundreds of forest dwelling creatures. (Individual, #1547.4.40000.240)

Management Themes

General Considerations

2-124 Public Concern: The Forest Service should clarify management themes and define terminology.

The Proposed Rule does not clearly identify what will take place within each management theme or define terms such as “limited,” “relatively,” “activities,” “preserving,” etc. We recommend that the Proposed Rule clarify the management themes and define terminology. (Individual, #205.7.21000.600)

2-125 Public Concern: The Forest Service should not proceed with the proposed management themes.

BECAUSE THEY WOULD OPEN ROADLESS AREAS TO DEVELOPMENT

I am opposed to the recategorization of Roadless Areas in Idaho into the four new management themes of 1) Wild Land Recreation, 2) Primitive, 3) Back Country/Restoration, and 4) General Forest, Rangeland, and Grass land. All of these would open the door to varying degrees of specific developments within each category, the most outrageously egregious of which would propose open pit phosphate mining in category number 4, without even the perfunctory performance of a full analysis. This is completely unacceptable. (Individual, #4.1.23100.206)

2-126 Public Concern: The Forest Service should revisit the use of management themes in the proposed Idaho Roadless Rule.

BECAUSE THE PUBLIC WOULD PREFER A HOLISTIC APPROACH

Further subdividing these lands from a management perspective is redundant and certainly appears to ignore the overwhelming public support for managing them in a holistic rather than themed manner. (Organization, #1821.20.23100.60)

BECAUSE THEY WILL DEGRADE ROADLESS AREA ACREAGE AND ROADLESS VALUES

The themed approach, coupled with the broad discretion to build additional roads, puts well over half of Idaho's roadless lands back into play for future development. The proposed IRR [Idaho Roadless Rule] justifies the themed approach because it allows the Forest Service to consider the unique characteristics of each Inventoried Roadless Area in the State. Outdoor Alliance believes, however, that the simple attribute of being an Inventoried Roadless Area is the dominant unique characteristic of these places. (Organization, #1821.19.23100.205)

Central design elements of the Idaho Roadless Rule will degrade Roadless Area acreage and roadless values in Idaho's National Forests. Shortcomings of the Themed Approach. The Idaho Roadless Rule is premised on a sliding scale or themed approach. Whereas the 2001 Roadless Rule designated a single category of Roadless Area, the proposed IRR contemplates five themes, with each theme receiving a different level of resource protection and a different extent of likely future development. Outdoor Alliance fundamentally disagrees with this design element Inventoried Roadless Areas should not be managed on a sliding scale of designating themes for the management. All roadless lands have a host of values inherent to Roadless Areas that are diminished, and in some cases, destroyed by road building and/or resource extraction. (Organization, #1821.16.23100.206)

BECAUSE THE SLIDING SCALE APPROACH IS INCONSISTENT WITH THE VALUE OF ROADLESS AREAS

The sliding scale approach is inconsistent with the fact that each and every Roadless Area has value as a backcountry recreation destination, and protects water quality, provides high-quality habitat, and offers superb scenery in many cases because they lack roads and the development associated with roads. (Organization, #1821.17.23100.510)

2-127 Public Concern: The Forest Service should apply the General Forest, Rangeland, and Grassland and Backcountry/Restoration management themes, as described.

We [Boundary County] agree that the General Forest, Rangeland, and Grassland (GFRG) be managed for multiple use, and that both the Backcountry/Restoration and the GFRG within the Roadless Areas provide for forest health treatments and activities, including salvage and thinning, and be given a priority and expedited consideration, at the request of the Governor's Office or the relevant Board of County Commissioners. (Government, #1691.5.23100.260)

2-128 Public Concern: The Forest Service should modify the Special Area of Historic or Tribal Significance management theme.

TO CLARIFY THAT AREAS IN OTHER MANAGEMENT THEMES MAY HAVE TRIBAL OR HISTORIC CHARACTERISTICS THAT SHOULD BE PROTECTED AT THE PROJECT LEVEL

In light of the federal government's continuing obligation to protect and enhance Tribal reserved rights, the Kootenai Tribe suggests the following addition to the Proposed Rule:

[Section] 294.20 Special area of historic or Tribal significance theme: An Idaho Roadless Area classification intended to be relatively undisturbed by human management activities in order to maintain unique Tribal or historic characteristics. [insert] Areas not included within such classification may also contain unique Tribal or historic characteristics, which shall be addressed on a project-by-project basis in consultation with affected Tribes.[insert]

The purpose of the foregoing suggested change is to ensure that areas that may not have necessarily been designated a “special area of historic or Tribal significance” will still receive protection in the event individual projects are proposed within an area under a different classification that also contain unique Tribal or historical characteristics. (Tribal Government/Elected Official/Agency, Bonners Ferry, ID - #227.2.23300.040)

2-129 Public Concern: The Forest Service should not classify any Roadless Areas as General Forest or Backcountry/Restoration.

We do not support any of the proposed designation of our National Forest Roadless Areas within the proposed General Forest, Rangeland, and Grassland (GFRG) theme (609,500 acres) or the Backcountry/Restoration theme (5,246,100 acres). (Preservation/Conservation, Spokane, WA - #1799.18.23100.001)

2-130 Public Concern: The Forest Service should create a Forest Plan Special Area – Ski Area theme.

For purposes of this rulemaking, ski area allocated lands include areas inside special use permit boundaries, areas addressed in a ski area’s master development plan, and lands allocated for ski area development under Forest Plans. Ideally, Idaho ski areas on National Forest System lands should be treated consistently under the final Rule. NSAA’s [National Ski Areas Association] preference is to move all roadless designated ski area lands into a “Forest Plan Special Area-Ski Area” theme. In describing this variation on the Forest Plan Special Area theme, the final Rule should explicitly recognize that ski area development in such Forest Plan Special Area-Ski Area themed lands is permitted, including necessary road building, tree removal and vegetative management. (Special Use permittee, - #1805.2.23700.520)

TO AVOID CONFUSION AND NEEDLESS EVALUATION

Given the complex and expensive approval process associated with developing new ski areas on public land, future skiing opportunities will occur through the expansion of existing ski facilities. Ski area expansion should not be hamstrung by the fact that it may occur in a so-called “Roadless” Area. It is imperative that the final Rule clarify that ski area development, including road building and timber removal, is appropriate in Forest Plan Special Area-Ski Area Theme areas. Any designation without this clarification will mislead and confuse the public and create a perception that ski area activities are either inappropriate, or not allowed, in Idaho Roadless Areas. Failure to clarify this point may create needless evaluation by the Forest Service as well. (Special Use permittee, - #1805.5.23700.520)

While ‘Backcountry’ and ‘Primitive’ themes may or may not prohibit the development of lifts and trails, they do prohibit roads and also mislead and confuse the public and create a perception that ski area activities are either inappropriate, or not allowed in IRAs [Inventoried Roadless Areas]. Keeping lands identified for ski area special uses in the Roadless Inventory creates additional evaluation by the Forest Service. Ski area developments face regulatory review under the National Environmental Policy Act (NEPA) and the National Forest Management Act (NFMA). These are adequate safeguards for evaluating ski area developments. Under the State Petition, road construction is only allowed in the ‘General Forest’ theme. Ideally, Idaho ski areas on National Forest System lands should be treated consistently under the final Rule. Our preference is to move all ski area lands into a “Forest Plan Special Area-Ski Area” theme. The description for this variation of the final Rule should explicitly recognize that ski area development in such Forest Plan Special Area-Ski Area themed lands is permitted, including structures, necessary road building, tree removal and vegetative management. (Special Use permittee, McCall, ID - #1820.6.23700.520)

2-131 Public Concern: The Forest Service should manage large portions of Inventoried Roadless Areas under the Commodity Production Emphasis within Forested Landscapes.

The County's recommendations made to the Office of the Governor should be brought back into this process. They were largely ignored by Governor Risch. Adams, Valley, and Idaho Counties recommended that large portions of the IRA's [Inventoried Roadless Areas] be managed under 5.2 - Commodity Production Emphasis within Forested Landscapes. (Individual, #1825.97.10200.30)

2-132 Public Concern: The Forest Service should better define the Primitive and Backcountry/Restoration management themes.

TO REDUCE POTENTIAL HABITAT LOSS

At risk [as a result of the Idaho State Roadless Plan] to me are the areas included in the Red Mountain and Peace Rock Roadless Areas assigned (ill defined) categories of "Primitive" and "Backcountry Restoration." These categories allow further habitat loss without adequately defining the closure/decommissioning of roads as determined by ecological priorities. (Individual, #1460.6.23100.300)

2-133 Public Concern: The Forest Service should retain the Wild Land Recreation, Primitive, and Backcountry/Restoration management themes.

BECAUSE THE THEMES WILL HELP PROTECT THOSE LANDS FOR RECREATIONAL USES

Our backcountry areas are "why" we live in Idaho. The 9.3 million acres of roadless land in our National Forest, its wild rivers, great fishing and great hunting- is part of what gives this state its special value. The 3.1 million acres placed in Wildlands Recreation and Primitive management categories will help protect that which we value. The 5.4 million acres in the Backcountry Restoration management category can help as well. Idaho's wild backcountry is a natural treasure for all Americans. Especially for those of us who live here, who love to backpack, fish, and hunt. (Individual, #217.1.23100.540)

2-134 Public Concern: The Forest Service should clarify the impact of the Idaho Roadless Rule on Wilderness resources.

TO REMOVE THE CONFLATION OF WILDERNESS WITH THE WILD LAND RECREATION THEME

On page 1143, the preamble discusses the impact of the proposed Rule on Wilderness resources. The discussion conflates the issue of recommended Wilderness (defined by NFMA [National Forest Management Act]) and the Wildland Recreation theme. The preamble states, "Acreage recommended for wilderness increases from 1,320,900 under the existing plans (that is, current Wilderness recommendation) to 1,378,600 under the proposed Rule. As is made clear by the definitions provided in the draft Rule, Wildland Recreation areas are not recommended Wilderness areas, and therefore, the issues should not be confused. Additional discussion should be provided in the final Rule and in the DEIS on the impact of the Idaho Rule on Wilderness resources and characteristics, and how the Idaho Rule may impact sufficiency of analysis as per extensive legal rulings since the time of RARE II. (Preservation/Conservation, Boise, ID - #4156.17.21000.650)

2-135 Public Concern: The Forest Service should keep the Selkirk Roadless Area intact.

TO PROTECT GRIZZLY BEARS, CARIBOU, AND WILDERNESS CHARACTERISTICS

With regard to the Selkirk IRA [Inventoried Roadless Area], the Forest Service and the state are proposing to continue to "nibble" and "chip away" at the periphery of one of the most outstanding IRAs on the Panhandle. This IRA is home to endangered grizzlies and woodland caribou. Slicing this Roadless Area up into a number of arbitrary "themes" will contribute to the decline of these species and the wilderness characteristics and values of the IRA. (Individual, #1703.10.23100.340)

2-136 Public Concern: The Forest Service should reconsider the management theme classification for the Lemhi Range Roadless Area.

BECAUSE THE PROPOSED CLASSIFICATION IS INCONSISTENT WITH THE AGENCY'S ASSESSMENT OF THE LEMHI RANGE ROADLESS AREA

Lemhi Mountains: The Lemhi Range Roadless Area is over 308,000 acres, and the Diamond Peak IRA [Inventoried Roadless Area] to the south is 167,000 acres (giving the range a total of about 475,000 roadless acres). The range has been the focus of Wilderness proposals, and wildlife biologists have identified it as a biological corridor between the Greater Yellowstone and Salmon-Selway Ecosystems. These Roadless Areas are highly regarded for their scenery, interesting mix of geology, wildlife, and other features that make them very good destinations for a variety of roadless recreation activities. In fact, the Forest Service DEIS includes the following in its description of the (308,000 acre) Lemhi Range IRA...

Natural Integrity: The Roadless Area is substantially natural appearing.

Special Features: Practically the entire area is a special attraction due to the outstanding scenery

Opportunities for Experience: The area has high natural integrity, and good opportunities for solitude, primitive recreation, and challenging experiences.

Recreation: The area contains outstanding scenery and excellent opportunities for hunting and fishing.

Fisheries: Fishing quality in the lakes is excellent.

Wildlife: Elk numbers are particularly high. Goats are common along the crest of the area.

Excellent black bear habitat and populations exist. Antelope inhabit the lower elevation sagebrush slopes.

A wide variety of small birds and mammals ranging from sage grouse to snowshoe hares inhabit the area.

Disturbance: Understory fuels are generally sparse and there is little potential for large fires.

After giving the above assessment, the FS DEIS continues with the Idaho Roadless Plan's recommendations for this IRA -> Wild Land- 0 acres, Primitive - 0 acres, Backcountry/Restoration - 305,000 acres. These recommendations are at odds with the FS assessment of the area, and I suspect, with the wishes of the majority of state residents. (Individual, #1695.20.63000.600)

Wild Land Recreation Management Theme

2-137 Public Concern: The Forest Service should reduce the areas in the Wild Land Recreation management theme.

TO PROTECT AIR QUALITY

Having 9.4 million acres in Idaho under the wildland use fire category, where letting the fire burn is the management prescription drives air pollution above the EPA allowable levels in several categories. The fact that the pollutants come from fires does not make them any healthier for the people who live in the impacted areas. There have been many days in McCall, where I live, and Secesh, where I own a cabin that you could not see across the street because of the smoke from forest fires. (Individual, #1825.19.43000.790)

2-138 Public Concern: The Forest Service should establish the Needles Roadless Area, including the Krassell Knob-Buckhorn Creek, as a Wild Land Recreation area.

BECAUSE THE NEEDLES ROADLESS AREA IS CONTIGUOUS WITH THE NEEDLES INVENTORIED ROADLESS AREA AND WILDERNESS CLASSIFICATION WOULD PROTECT KEY FISH AND WILDLIFE SPECIES

For these reasons--salmon habitat, wildlife values, the presence of native stands of Ponderosa pines, and the stark beauty of the area-we suggest that the USFS establish the Needles Roadless Area, with the

Krassell Knob-Buckhorn creek included, as a Wildland Recreation Area. Additionally, the contiguous roadless land in the IRA [Inventoried Roadless Area] should be maintained in its primitive state. And the name of this landscape should be a more descriptive name like the Buckhorn Roadless area or Chinook Roadless Area. (Preservation/Conservation, #1480.11.62000.2)

Needles Roadless Area:

SWC's [Secesh Wildlands Coalition's] first priority is for the Needles Area, which includes 161,200 acres on the Payette and Boise National Forests. Ninety-five thousand acres of this area are recommended by the Forest Service as deserving wilderness protection and the Idaho Roadless Plan would define the same 95,000 acres under the Wildland Recreation Theme. This recommendation for wilderness should be continued in the Idaho Roadless Rule and the Krassell Knob-Buckhorn area (approximately 30,000 acres) directly east should be added to it. The Krassell Knob-Buckhorn Creek unity is continuous with the Needles IRA [Inventoried Roadless Area] (there is no identifiable separation between the proposed wilderness and Krassell Knob area), both contain identical qualities. These qualities include large Ponderosa pine trees, imperiled wildlife (wolverine, lynx, grey wolves, and occasional bighorn sheep, and lots of elk), superb views, hot springs, rugged country, spectacular creeks, like Buckhorn and Fitusm Creeks, and most importantly, the Krassell Know-Buckhorn Creek area lies beside the South Fork of the Salmon River. Several creeks in this area, as well as the South Fork, support threatened Chinook salmon and bull trout. Rare cutthroat trout and lamprey eels are also present there. Long term protection of the land adjacent to the SFSR [South Fork of the Salmon River] is critical to protecting key fish and wildlife. (Preservation/Conservation, #1480.5.62200.350)

2-139 Public Concern: The Forest Service should classify the French Creek Roadless Area as Wild Land Recreation.

TO RESOLVE MANY OF THE LAND MANAGEMENT CONFLICTS OF THE PAST

French Creek Roadless Area:

The 88,000 acre French Creek Roadless Area has been the site of many pitched battles in the last two decades because of its timber, remarkable solitude, and wildlife values. And of course, wildfire has changed the appearance of much of the place, having burned over it in the fires of 1994. Fortunately, the price of road building and logging and fights between conservationists and loggers has spared the area from severe damage in 20 years. The Idaho Roadless Rule would identify most of this area as a Backcountry Recreation/Restoration area and the Forest Plan has refused similarly to resolve any of the issues in the past. These conflicts have festered over the years.

Secesh Wildlands Coalition proposes that the land including French Creek and Little French Creek on the west side of the Roadless Area and east to near Burgdorf, then north along Fall Creek should be considered as a Wildland Recreation Area. This would protect the Wild and Scenic river corridors, most of the critical wildlife habitat, and rugged lake systems. It would also resolve some of the ORV concerns that people have raised and preclude snowmobile use in places where the terrain is dangerous or impossible for them to gain access to. We look forward to being involved in a collaborative group to look at and resolve these issues in the French Creek Roadless Area. (Preservation/Conservation, #1480.14.62000.2)

Primitive Management Theme

2-140 Public Concern: The Forest Service should avoid using the Primitive management theme.

BECAUSE ROADLESS AREAS SO CLASSIFIED WOULD FALL SHORT OF THE WILDERNESS SUITABILITY CRITERIA

The Primitive "Management Theme" will open the door to some logging and road building on 1.6 million acres. These areas will, then, will fall short of the Forest Service's recommended wilderness suitability criteria. (Individual, #18.5.23400.650)

2-141 Public Concern: The Forest Service should classify any sage-grouse habitat as Primitive.

TO PROTECT EXISTING POPULATIONS AND HABITAT

The listing petition for sage-grouse is currently being revisited based on a recent court ruling. As with the Bonneville and Yellowstone cutthroat trout, the Forest Service must avoid actions that would contribute to the trend in a species population that would warrant listing of the species under the Endangered Species Act. Portions of Idaho Roadless Areas proposed for the General Forest theme include known sage-grouse habitat. It is inappropriate to designate these areas as such. We [Idaho Conservation League] specifically recommend that any sage-grouse habitat be designated as Primitive, in order to ensure protection of existing populations and habitat. In the FEIS, the Forest Service must consider, analyze, and implement an alternative that would not contribute to this species decline. (Preservation/Conservation, Boise, ID - #4156.88.23400.135)

2-142 Public Concern: The Forest Service should avoid using the Wild Land Recreation and Primitive management themes.

BECAUSE AREAS DESIGNATED WITH THESE THEMES WOULD BE ESSENTIALLY WILDERNESS AREAS

With the Wild Land and Primitive Designations you are in essence declaring these “Wilderness Areas.” They will be managed with “wilderness character.” There are already plenty of wildernesses in Idaho. These designations place unfair restrictions to motorized use. (Individual, #232.2.23100.530)

2-143 Public Concern: The Forest Service should classify most of the Secesh Roadless Area as Primitive.

TO PROTECT THE GEOLOGIC AND BIOLOGIC DIVERSITY

Secesh Roadless Area:

The 248,000 acre Secesh Roadless Area is by far the largest, most scenic, and most geologically and biologically diverse IRA [Inventoried Roadless Area] in central Idaho. The Forest Service wilderness proposal for the Secesh IRA is 110,300 acres. It runs west-to-east which gives it a preeminent place in Idaho to provide migration of wildlife habitat in a warming world. The elevation runs from 3,400 feet in elevation to above 9,000 feet at Loon peak—from grasses at lower elevation to above [the] tree line through lodgepine, Douglas Fir, and Ponderosa pines, spruce, larch, aspen, and up to whitebark pine near the rocky summit. This region is quite rugged among Victor Peak, Loon Peaks, and Storm Peak where a number of spectacular lakes occur: Enos, Jungle, Twenty mile, Storm, Victor, Burnside, Hum, Box Lakes and others, several without names. The Secesh River and the South Fork Salmon River flow through the Secesh Roadless Area, which protects critical salmon and steelhead habitat and forms the greatest character of the region. The name is fabulous, indicating some of the rich history of the region and that it was originally settled by Secessionists at the end of the American Civil War.

The intact landscape supports a number of animals: Wolves, bighorn sheep, bears, martin, and perhaps wolverine and fisher. A bicycle trail exists to Loon Lake and should be cut out in designation of the area as Wilderness. Some mountain bikers claim the trail to Duck Lake and Twenty mile lakes should remain open to bicycle use. I disagree. The WUI [Wildland-Urban Interface] in the IRA is inappropriate and would lead to more damaging logging. The WUI doesn't seem to protect anything and with most of the Secesh Roadless Area having been burned already, it is plainly foolish. All of the recommended wilderness in the Forest Service's 1980 Forest Plan should be protected and the Primitive area that surrounds this region in the Idaho Plan should be ardently maintained. A definition like that which was in place for the old Idaho Primitive Area should be reconsidered for the Secesh IRA outside of proposed wilderness and Wildland Recreation prescriptions. (Preservation/Conservation, #1480.12-13.62000.2)

Backcountry/Restoration Management Theme

2-144 Public Concern: The Forest Service should modify the Backcountry/Restoration management theme to allow the “significant risk” exception only in delineated Wildland-Urban Interface and watershed areas.

ONCE THE WILDLAND-URBAN INTERFACE AND WATERSHED AREAS ARE DEFINITELY DELINEATED AND A CLEAR AND USABLE DEFINITION OF “SIGNIFICANT RISK” HAS BEEN PROVIDED

Once WUI [Wildland-Urban Interface] and watershed areas are definitively delineated and there is a clear and useable definition of “significant risk,” it would make sense to change the Backcountry theme and allow the “significant risk” exception only in the delineated WUI and watershed areas. That would make the rest of the Backcountry theme consistent with the 2001 Rule, as it would be under the same “imminent threat” exception found in that Rule. By various definitions of where the WUI and municipal watershed are, this would make the vast majority of the Backcountry theme the same as the 2001 Rule, thus eliminating the criticism that the Idaho Rule opens up all, or even most, of the Backcountry to “reduced protections.” For example, using a WUI definition of one mile, 639,712 acres of Backcountry would be in the WUI, leaving 88% of the Backcountry equivalent to the 2001 Rule on this issue. (Preservation/Conservation, Boise, ID - #4156.173.20000.600)

2-145 Public Concern: The Forest Service should subject all portions of the Backcountry/Restoration management theme outside Wildland-Urban Interface or municipal watersheds to the “imminent threat” exception.

TO MAKE MANAGEMENT OF THOSE AREAS EQUIVALENT TO THE 2001 RULE

All portions of the Backcountry theme outside of WUI [Wildland-Urban Interface] and municipal watershed areas should not be subject to the “significant risk” exception. Those acres should be subject only to the “imminent threat” exception, thus making the management of those acres exactly equivalent to the 2001 Rule. (Preservation/Conservation, Boise, ID - #4156.183.21000.263)

2-146 Public Concern: The Forest Service should avoid using the Backcountry/Restoration management theme.

BECAUSE IT WOULD ALLOW ROAD CONSTRUCTION, TIMBER HARVEST, AND OTHER DEVELOPMENT

The “Management Theme,” Back Country Restoration, despite its rhetoric, will allow road construction, logging, and other development on 5.2 million acres. The effects of this “Management Theme” will fall somewhere between Superfund Cleanup site and its present pristine state of undeveloped wildlife habitat. (Individual, #18.4.23500.201)

BECAUSE THE ROAD CONSTRUCTION EXCEPTIONS ARE AMBIGUOUS AND ROLL BACK EXISTING PROTECTIONS

New exceptions for building roads in the back country theme are ambiguous and roll back currently existing protections. Perhaps most shocking is the fact that 609,000 acres of roadless lands, most of which is near Yellowstone National Park, will lose all protection and be open to commercial logging, road building, and mining. The Forest Service claims these measures are necessary to protect communities. (Individual, #218.33.23500.800)

BECAUSE IT WOULD APPLY TO AREAS WITH A HISTORY OF TIMBER HARVEST AND MOTORIZED USE

I object to the proposed plan in that it declares areas that currently have roads as roadless. You have used the Back Country/Restoration designation (at a minimum) in areas that clearly have had a history of logging and motorized use with a lot of human activity. The most important part of all planning objectives should be the concerns and needs at the local level. What might work well in one forest may not work in another. Every forest has its own personality and public use. The broad-brush stroke of one-size fits all that the Forest Service is using now just caters to the left-wing environmentalist groups that would have everybody off public lands altogether. (Individual, Lewiston, ID - #232.5.20000.61)

2-147 Public Concern: The Forest Service should add acres to the areas covered by the Backcountry/Restoration management theme on the Clearwater, Nez Perce, and Idaho Panhandle Forests.

Several ALC [Associated Logging Contractors] members have attended and participated in the public meetings held by the various boards of county commissioners, as well as certain public information meetings conducted by the Forest Service. It is the consensus of the ALC Board of Directors that, in general, additional acres of forest land should [be] managed under the “Backcountry Management Theme” and that additional acreage should be developed on the Clearwater, the Nez Perce, and the Idaho Panhandle forests. (Organization, #1699.9.23500.57)

2-148 Public Concern: The Forest Service should revise the Backcountry/Restoration management theme.

TO REQUIRE DOCUMENTATION OF HABITAT FOR SPECIAL-STATUS SPECIES BEFORE ALLOWING TIMBER HARVESTING

The following provision should be added to the management direction of the backcountry theme: the maintenance or improvement of habitat for threatened, endangered, proposed, indicator, and sensitive species must be scientifically documented for terrestrial and aquatic species before timber harvest is allowed in Roadless Areas. (Individual, #268.13.23500.340)

TO LIMIT THE SUBJECTIVE DISCRETION ASSOCIATED WITH ROAD CONSTRUCTION VARIANCES

Under the backcountry theme, roads are permissible under seven discretionary variances. Roads are permissible if only one of the seven variances is met. Of these loopholes, the most likely to be employed to compromise Roadless Areas will be: to facilitate forest health activities permitted under timber cutting, sale, or removal (#1) and a road is needed in conjunction with activities permissible under the limited mineral exceptions for Backcountry (#7). There is simply too much subjective discretion and room for interpretation associated with these variances to adequately protect and preserve Roadless Areas. (Individual, #268.14.23500.206)

2-149 Public Concern: The Forest Service should not allow roads in areas categorized under the Backcountry/Restoration management theme.

I would like to see no roads in Backcountry Restoration areas, without the proposed exceptions as well. (Individual, #207.6.23500.1)

2-150 Public Concern: The Forest Service should ensure that the Backcountry/Restoration management theme authorizes sufficient management flexibility.

TO ADDRESS FIRE, INSECT, DISEASE, DROUGHT, AND OTHER FOREST HEALTH ISSUES

It is important that the Final Rule authorize sufficient flexibility in the “Backcountry/Restoration” category lands to allow for management needed to address fire and insect, disease, drought, and other forest health and ecosystem problems before they become an emergency crisis for Counties and communities that depend on these areas economically as well as for direct watershed and quality of life benefits. Flexibility to address landscape-scale and other threats beyond designated WUI and municipal watershed boundaries at an early enough stage to be effective is critical. Such measures can be evaluated and implemented at the project level to perpetuate and enhance roadless and ecosystem values long-term. (Regional/other governmental agency (multi-jurisdictional), Boise, ID - #6545.4.23500.260)

2-151 Public Concern: The Forest Service should strictly limit roads in areas categorized under the Backcountry/Restoration management theme.

TO REDUCE OFF-ROAD VEHICLE ACCESS AND RESULTING ENVIRONMENTAL DEGRADATION

New roads into the “backcountry” theme should be strictly limited to absolute necessity to protect life and property. Then procedures and enforcement must be in place to ensure those temporary roads are closed once the work is done. My concern is that an excuse will be found/sought to allow a newly constructed road to become designated as “essential.” Once a road is in, the “spider web” effect of exploratory off-road trails by motorized vehicles will begin, thus degrading the overall intent of the backcountry theme, which is to “retain their undeveloped character.” (Individual, #953.1.23500.680)

2-152 Public Concern: The Forest Service should remove the exemption for phosphate mining from the Backcountry/Restoration management theme.

BECAUSE PHOSPHATE MINING RESULTS IN SELENIUM CONTAMINATION

Over 400,000 acres of the Southeast Idaho will have their protection decreased to either general forest or back country restoration. Now I mention back country restoration in this case because -- I’ll wrap up -- because within back country restoration phosphate mining has been allowed an exemption to mine. Currently there [are] 17 superfund sites that have come into existence because of selenium contamination from phosphate mining, and I think it’s time that we go back to protecting these Roadless Areas and not adding to this selenium contamination superfund site, a situation that could and will continue under this new Idaho roadless rule. (Individual, #218.19.23100.423)

2-153 Public Concern: The Forest Service should manage the Napoleon Ridge, Phelan, South Deep Creek, Deep Creek, Jureano, Musgrove, Napias, and Haystack Mountain Roadless Areas as Backcountry/Restoration.

TO REDUCE THE IMPACTS OF ROADS ON NATIVE FISH SPECIES

Roads have a huge impact on native fish species as well. I would like to see Napoleon Ridge, Phelan, South Deep Creek, Deep Creek, Jureano, Musgrove, Napias, and Haystack Mountain also managed under the Backcountry Restoration category in the Idaho Roadless Rule. (Individual, #1857.2.23500.352)

General Forest, Rangeland, and Grassland Management Theme

2-154 Public Concern: The Forest Service should provide the detailed reasons why each Roadless Area was placed in the General Forest management theme.

The proposed Idaho Roadless Rule includes 609,000 acres of the General Forest management theme, open to development (roads, logging, minerals, etc.) without exception. The rationale that has been provided for this designation, by the State of Idaho, is that these areas have been developed (through roads, logging or other activities), do not deserve a roadless designation, or are not forested. The Forest Service makes no attempt to support these arguments in the draft Rule or DEIS. However because these were the arguments used to establish this management category, we [Idaho Conservation League] feel that it is incumbent upon the Forest Service to discuss and support (if it is supportable) why these lands were designated as such. (Preservation/Conservation, Boise, ID - #4156.39.21000.600)

TO COMPLY WITH THE REQUEST OF THE ROADLESS AREA CONSERVATION NATIONAL ADVISORY COMMITTEE

The RACNAC [Roadless Area Conservation National Advisory Committee] specifically requested that the Agency give the detailed reasons why each Roadless Area was placed in the GFRG [General Forest, Rangeland, and Grassland] theme; that request is not answered in the draft Rule or the DEIS. (Preservation/Conservation, Boise, ID - #4156.191.17000.600)

2-155 Public Concern: The Forest Service should avoid use of the General Forest, Rangeland, and Grassland management theme.

BECAUSE IT WOULD RESULT IN AREAS BEING DENUDED, ROADED, AND SEVERELY DAMAGED

The category, General Forest, Rangeland, and Grassland, will turn some areas in southern Idaho from pristine Wildlife habitat, to open-pit and mountain-top removal phosphate mines. Other pristine areas, for example in northern Idaho, will become denuded, roaded, and severely damaged. (Individual, #56.3.23600.200)

BECAUSE IT WOULD ALLOW DESTRUCTIVE PHOSPHATE MINING

The General Forest, Rangeland, and Grassland “Management Theme” would be heavily impacted with roads, logging, and mining. This “Management Theme” will be the most destructive element of this DEIS. Most of the 609,500 acres of this category will be given to the phosphate mining industry from wild-lands in Southern Idaho. One of the nicest descriptions of this trade off is, World-class Premier Wildlife Habitat exchanged for Superfund Cleanup Sites. (Individual, #18.3.23600.423)

2-156 Public Concern: The Forest Service should reevaluate areas classified as General Forest.

BECAUSE MANY OF THESE AREAS SHOULD BE ASSIGNED A MORE PROTECTIVE MANAGEMENT THEME

Now is the time to fine tune the Idaho roadless rule and move areas to the categories [in which] they are most appropriate. Many of the areas in General Forest have Roadless Area qualities that make them more appropriate for Backcountry Restoration or higher management categories. The Forest Service should reevaluate each individual Idaho Roadless Area currently in the General Forest theme to determine appropriateness for General Forest or higher management categories. Portions of Roadless Areas appropriate for the General Forest category are those that have already been harvested and roaded. For example, a defined area in the northwest corner of the Phelan Roadless Area in the Salmon National Forest has been roaded and logged. This managed and roaded section in Phelan is appropriate for the General Forest category, but areas of the Roadless Area that have not been logged or roaded should remain in the Backcountry Restoration category. (Organization, #1817.19.23500.206)

2-157 Public Concern: The Forest Service should not classify Roadless Areas as General Forest.

BECAUSE THESE AREAS NEED MORE PROTECTIONS, NOT FEWER

I do not want to see Roadless Areas designated as General Forest to have their protections lifted. We need more protection for these areas, not fewer. (Individual, #899.4.23600.200)

2-158 Public Concern: The Forest Service should divide the General Forest, Rangeland, and Grassland management theme into two themes.

TO SEPARATE AREAS WITH KNOWN PHOSPHATE LEASING AREAS

Divide the GFRG [General Forest, Rangeland, and Grassland] theme into two themes: (1) phosphate mining area theme, limited to the KPLAs [Known Phosphate Leasing Areas], and (2) a Rangeland/Recreation theme, which would reflect the actual plans and the existing analysis. If there is a need for limited WUI [Wildland-Urban Interface] muni[cipal] watershed work in the forested portions of these areas, then the Agency could also apply the “substantial risk” exception used in the Backcountry theme (assuming we work that out first) to these areas. For GFRG areas in forests other than the Caribou-Targhee, it may be best to move them into the Backcountry theme and allow the “substantial risk” exception to handle any WUI work needed there. (Preservation/Conservation, Boise, ID - #4156.206.23100.160)

2-159 Public Concern: The Forest Service should remove areas in the Napoleon Ridge Roadless Area from the General Forest management theme.**BECAUSE SO CLASSIFYING SUMMER RANGE DOES NOT MEET THE NEED IDENTIFIED IN THE IDAHO ROADLESS RULE**

Close analysis of the designations on the IPNF [Idaho Panhandle National Forest] reveals that roadside buffers have been designated as General Forest. This applies to the East Cathedral Peak, East Fork Elk, Magee, Mallard-Larkins, Schafer Peak, Scotchman Peaks, and Upper Priest IRAs [Inventoried Roadless Areas].

Rationale provided for the designation of General Forest for the Napoleon Ridge IRA [Inventoried Roadless Area] on the Salmon-Challis NF [National Forest] references “big game summer range.” No discussion or justification is provided for how big game summer range is appropriate for the General Forest designation. Further, designation of summer range, as General Forest does not meet the need identified by the state petition, or statements of Lt. [Lieutenant] Governor Risch. (Preservation/Conservation, Boise, ID - #4156.160.20000.600)

2-160 Public Concern: The Forest Service should not classify the Selkirk Mountains as General Forest.**TO PROTECT THEM FROM EXPLOITATION BY SPECIAL INTERESTS**

I strongly support continuing protections for Idaho’s remaining natural Roadless Areas. Leave them as they are. I am most concerned with the Selkirks and other areas surrounding Priest Lake, where my family and I have owned property for sixty years. Therefore, I am deeply concerned about the Forest Service’s and State of Idaho’s recently released forest management plan for Roadless Areas. The Selkirks should not be declared as “general forest.” (Individual, #179.1.23600.200)

The Selkirks must not be categorized as “general forest” to remove most of the protections they currently enjoy. Under the current rules, The Lands Council has worked with stakeholders and the Forest Service to develop forest management plans with the flexibility to manage forest health issues as they arise, protect homes and communities from wildfire, and provide opportunities for industry while creating strong protections for these special places. We don’t need to open the door to special interests by rolling back these protections for Idaho’s backcountry. (Individual, #231.3.23600.50)

2-161 Public Concern: The Forest Service should not classify the Selkirk and Kootenai Mountains as General Forest.**TO PROTECT FORESTS AND THE AQUIFERS**

Please protect 9.3 million acres of Idaho’s Roadless Areas, especially the Selkirk and Kootenai mountains. Do not make these lands part of the “general forest.” Keep them protected. The aquifers of hundreds of thousands of American citizens would be affected by the change. (Individual, #172.1.23600.241)

2-162 Public Concern: The Forest Service should classify the Musgrove and Agency Creek areas, the southeastern portion of Jureano, and the Wagonhammer and Silverleads drainages as General Forest.**TO REDUCE FUEL LOADS AND CONTAIN BEETLE INFESTATIONS**

Several areas were pointed out that have been harvested in the past and contain merchantable materials that could be easily removed to reduce fuel loads and help to contain beetle outbreaks. These areas include the Musgrove and Agency Creek areas, as well as the southeastern portion of Jureano and the Wagonhammer and Silverleads drainages within West Big Hole. Designating these small areas as general forest would greatly alleviate the concerns of our county as they apply to both forest health and economic opportunities. (Government, #584.11.23600.2)

2-163 Public Concern: The Forest Service should classify the Caribou-Targhee, Sawtooth, and Salmon-Challis National Forests as General Forest.

Several areas which have been designated in the Southeast region of Idaho would be better served if they were classified as general forest, and vegetation management treatments were allowed on these acreages. They include: Caribou-Targhee National Forest, Sawtooth National Forest and Salmon-Challis National Forest. (Organization, #1813.11.23600.260)

2-164 Public Concern: The Forest Service should not classify the Caribou-Targhee area as General Forest.

TO PROTECT STREAMS AND YELLOWSTONE CUTTHROAT TROUT

The potential damage to fish and wildlife from areas open to logging on the Caribou-Targhee is great. For example, the streams within the Caribou City IRA [Inventoried Roadless Area], Tincup Creek and its tributaries, and Jackknife Creek and its tributaries are especially important to Yellowstone cutthroat trout, yet more than 17,000 acres in the Caribou City IRA would be reclassified as General Forest and opened to logging, road construction and other forms of development under the proposed Rule. (Recreation/Conservation Organization, #1649.78.70000.352)

2-165 Public Concern: The Forest Service should reduce the percentage of the Caribou-Targhee National Forest to be managed under the General Forest management theme.

BECAUSE THE DECREASE IN HABITAT INTEGRITY WILL NEGATIVELY AFFECT MULE DEER

I'm here today just to raise some questions and concerns about the petition. There [are] a lot of good parts about it, but there [are] also some concerns. And one of those is Southeast Idaho and the Caribou-Targhee National Forest. If there's a place that is legendary for fine mule deer it's the Caribou-Targhee. People like Jack O'Conner spoke of its grandness for mule deer hunting. And when you look at the fact that there's 17 percent of the state's back country forests in Southeast Idaho in the Caribou-Targhee, but yet 65 percent of them are proposed for general forest, there's a real concern about what future roads could do for habitat security. And that leads, decrease in habitat security has to be made up for by the state Fish and Wildlife Agency, generally through a reduction in hunter opportunity, either through shorter seasons or less available tags, which puts a rush on the season. (Individual, #218.38.23100.560.)

I know the governor asked us not to concentrate on the general forest areas, but there's some issues down in the Caribou-Targhee that are unique, and that is the mule deer. The genetic makeup of that herd makes it one of the two or three prime mule deer herds in the country. I realized you have categories for a roadless [area]. But somehow we have to understand the richness of those categories; they may not look like they should be roadless. Even the degree of roading there, yes, compared to central Idaho it's much higher. But it isn't enough yet to destroy that mule deer herd. Roads destroy wildlife, or they will eliminate hunting opportunity, one of the two. And so we have a unique situation over that mule deer herd. It's starting to recover from harsh 1990s winters. It is one of the highest-quality mule deer herds in the country. And if we lay 78 percent of the general forest category down on 20 percent of the forest, which is what's happening - it's about 20 to 30 percent of that forest will be general forest - we're going to wipe out that herd. It doesn't take much. These are small islands, many of them, thin mountain ranges surrounded by residential or farm country. There's only one or two ridges close together, or it's a peak within limited foothills. And once you go in and knock down either the summer range or the residual winter range, those deer are gone. (Individual, #218.46.23600.351)

2-166 Public Concern: The Forest Service should revisit the impacts of the General Forest management theme on the aboriginal territories of the Shoshone and Bannock peoples.

BECAUSE THE CARIBOU-TARGHEE NATIONAL FOREST PROVIDES UNIQUE OPPORTUNITIES FOR THE TRIBES UNDER THE FORT BRIDGER TREATY OF 1868

The Tribes [Shoshone-Bannock] have a significant concern because the Proposed Rule involves lands within the aboriginal territories of the Shoshone and Bannock Peoples~ who ranged throughout much of the western United States and Canada. The Caribou-Targhee National Forest (CTNF) provides unique opportunities for the Tribes, in terms of Treaty [Fort Bridger Treaty of 1868] rights and the exercise of ceremonial activities. There are seven Roadless Areas that will be designated as GFRG [General Forest Rangeland, and Grassland] in the Caribou portion of the CTNF that contain superfund sites due to mining activities and other IRAs [Inventoried Roadless Areas] that fall within the boundaries of the original Fort Hall reservation at risk. Future mineral exploitation may further compromise ecosystem viability and biological diversity, as well as lead to further contamination of the Blackfoot and Salt River Drainages. Many of the other IRAs in the Caribou portion of the CTNF have been chosen as GFRG, leaving them open for different forms of development. The Tribes are concerned with every IRA in Idaho but oppose the weak protection that will be accorded to IRAs in the Proposed Rule just outside the reservation boundary and throughout Southern Idaho. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.32.23100.150)

2-167 Public Concern: The Forest Service should not classify the areas adjacent to the Pioneer Mountain Roadless Area as General Forest.

BECAUSE LOGGING AND FUELS REDUCTION EFFORTS ARE NOT NEEDED

The general forest category applied to the Roadless areas adjacent to the Pioneer Mountain IRA [Inventoried Roadless Area] in the Little Wood River Valley should be removed. Logging or fuels reduction is not necessary to protect private property, homes or lives in this area. (Individual, #1703.25.23600.263)

2-168 Public Concern: The Forest Service should classify the South Deep Creek, Deep Creek, Perreau Creek, Phelan, Haystack Mountain, and Napias Inventoried Roadless Areas as General Forest.

TO BE CONSISTENT WITH THE CURRENT FOREST PLAN AND PROTECT LEMHI COUNTY CITIZENS FROM FOREST FIRES

After we [Lemhi County Board of Supervisors] reviewed both public comment and GIS [Geographic Information System] data, it became clear that the Jesse Creek IRA [Inventoried Roadless Area] was a special area indeed. When the road network was added to the forest map, it became clear that, although almost all of the IRAs in Lemhi County contained a significant number of roads, Jesse Creek did not. Topographical data revealed that nearly all of the area is comprised of extremely steep slopes, making traditional harvest techniques almost impossible. Nevertheless, it became apparent that the amount of beetle kill in the area constitutes an extreme fire hazard threatening a community that contains half of the county's population. To us, it is obvious that a different approach to fire protection is necessary. A review of the fire history of central Idaho during the past decade shows an apparent repeating pattern. Wildfires tend to be generated by lightning in Wilderness and Roadless Areas, after which they gather strength and move east and northeast in the form of crown fires. In the recent past, only one wildfire has crossed the ridge on the west side of the Salmon River. The Finstur fire of 2000 came over this ridge in the Diamond Creek area, and burned all the way down the slope to the riverbank. This fire occurred less than five miles from the City of Salmon, most of which lies on the west side of the river. From this, we concluded that wildfire in Jesse Creek will be extremely difficult to contain and will have catastrophic effects on the City. As such, we believe that a far more viable strategy is to contain crown fires before they reach the Jesse Creek drainage, on the slopes between Panther Creek and the Salmon River ridge road. Those slopes are, unfortunately, comprised almost entirely of IRAs. We strongly recommend that barriers to active management on those IRAs be minimized to the greatest extent possible.

Therefore, we feel that South Deep Creek, Deep Creek, Perreau Creek, Phelan, Haystack Mountain, and Napias IRAs need to be placed in the theme of general forest. The current Forest Plan calls for active harvest in these areas, and the Lemhi County Board of Commissioners strongly believes that these types of activities are vital for the safety of our residents. (Government, #584.9–10.23600.264)

2-169 Public Concern: The Forest Service should not classify Roadless Areas along the Idaho/Montana border as General Forest.

BECAUSE THESE AREAS PROVIDE HABITAT SECURITY FOR BIG GAME

We [Hellgate Hunters and Anglers] understand there are ongoing attempts to downgrade the management categories of the West Big Hole and Agency Creek Roadless Areas in the Salmon-Challis NF [National Forest] to General Forest management [theme]. These areas provide very important habitat security with big game herds shared by both Montana and Idaho, and we ask that no areas along the Idaho/Montana border be downgraded to the General Forest category. (Organization, #1535.6.23600.300)

2-170 Public Concern: The Forest Service should classify the Roadless Areas along the Idaho/Montana border as Backcountry/Restoration.

We [Hellgate Hunters and Anglers] are concerned about ongoing attempts to weaken management regulations in areas along the [Montana] border to the General Forest category in areas currently proposed as Backcountry Restoration in the proposed Rule. (Organization, #1535.2.23100.600)

TO AVOID IMPACTS TO HUNTING AND WILDLIFE

I think it crucial that the Roadless Areas along the Idaho/Montana border should be placed in the “Backcountry Restoration” category in the Idaho roadless rule. The areas of Garfield Mountain, Italian Peaks, Agency Creek, and the West Big Hole are critical for big game and hunting in Montana. These areas deserve a strong conservation strategy in the Idaho roadless rule because they are important for maintaining quality hunting in Both Idaho and Montana and new roads in these areas on the Idaho side of the border will negatively impact hunting and wildlife in Montana. (Individual, #1857.1.23500.560)

TO PROVIDE FOR MANAGEMENT ACTIVITIES WHILE PROTECTING BACKCOUNTRY VALUES

As a hunting and fishing organization working to maintain Montana’s fair chase hunting and fishing heritage, we [Hellgate Hunters and Anglers] believe that all Roadless Areas near and contiguous to the Montana border should be managed under the Backcountry Restoration category at a minimum in the Idaho rule. The Backcountry Restoration category allows for needed management activities, while protecting the important backcountry values of Inventoried Roadless Areas both in Idaho and Montana. (Organization, #1535.4.23500.600)

2-171 Public Concern: The Forest Service should reduce the acres classified as General Forest, Rangeland, and Grassland in the Caribou-Targhee National Forests.

BECAUSE TOO LARGE A SECTION OF LAND WOULD BE SUBJECTED TO DESTRUCTIVE PHOSPHATE MINING

I read with mixed emotions the proposed Idaho Roadless Rule and wanted to weigh in, if at all possible, on the issue. I’m a hunter and an angler here in Idaho, and I value our roadless backcountry because it provides unmatched habitat for the fish I chase the game I stalk. In general, I’m pleased with the Idaho rule, but I do have some heartburn with certain aspects of the rule, most notably the HUGE amount of land that will be “protected” under the General Forest, Rangeland, Grassland category. I live in southeast Idaho, and noted that about 70 percent of the GFRG acreage comes from my neck of the woods. I understand that forest management in today’s world is complex, and that many user groups are demanding attention and “access.” My worry, though, is that the Forest Service has created a “sacrifice zone” in the Caribou and Targhee--a sacrifice to the vocal ATV crowd and especially to those who would literally take public land and turn it upside down in search of phosphate. I’m all for multiple use,

but I think the Forest Service, and perhaps the state, have gone past that mantra and given too much credence to one use. I like to use the phrase, "Everybody has a right to use public land, but nobody has a right to ruin for everybody else." (Individual, #17.1.23600.53)

2-172 Public Concern: The Forest Service should remove the Bear Creek Roadless Area from the General Forest, Rangeland, and Grassland management theme.

BECAUSE THE AREA PROVIDES QUALITY HABITAT FOR NATIVE YELLOWSTONE CUTTHROAT TROUT, BROWN TROUT, AND ELK

On the whole, the plan is solid. I would like to see some revision in the number of acres devoted to GFRG, particularly in the Caribou and Targhee forests. For instance, the Bear Creek Roadless Area in the Caribou National Forest is listed under that "catch-all" category. It was my understanding that land with quality habitat, a light human footprint and solid populations of wildlife would be protected under Gov. [Governor] Risch's plan. Bear Creek is home to a robust population of native Yellowstone cutthroat trout, as well as a significant spawning run of brown trout that spend the bulk of their lives in Palisades Reservoir. Additionally, the Bear Creek drainage is home to a large herd of elk and provides excellent summer and fall habitat for mule deer, grouse, black bear and mountain lion. It's a big Roadless Area with little more than a footpath leading into its heart, and the Idaho rule would essentially downgrade its protective status based on what? Please reconsider this poorly conceived notion. (Individual, #17.2.23600.350)

2-173 Public Concern: The Forest Service should not proceed with the proposed changes to the Hellroaring area.

BECAUSE OF THE IMPACT ON VIEWS

The anticipated change in the Hellroaring area of the Selkirks would significantly alter the entire view I have from my property, and I'm not the only property owner who feels this way. (Individual, #581.3.40000.770)

Requests for Changes in Management Themes

2-174 Public Concern: The Forest Service should reclassify the Two-Top area from Primitive to General Forest or Backcountry/Restoration.

BECAUSE THE AREA SHOULD BE HARVESTED AND NO LONGER PROVIDES CRITICAL GRIZZLY BEAR HABITAT

There are changes I would like to see in the proposed Rule. The first change involves the Two-Top area on the Island Park R.D., Targhee N.F. The proposed Rule places Two-Top in a Primitive category. I ask that this be changed to the General Forest category, or at least the Backcountry/Restoration management area. I ask this because the Two-Top area consists mainly of old, over mature stands of Douglas fir and lodge pole pine. It is a pleasant forested area, but not spectacular or unique. At one time Two-Top was believed to be important to recovery of the grizzly bear, but with removal of sheep grazing the bear essentially vanished from there and with delisting of the griz[zly bear], it is no longer as critical for the bear's recovery. In fact, if we created some openings in the forest to provide a mosaic of vegetation and age classes, Two-Top would better meet the needs of the omnivorous bear. Either of the two management options I suggested will better serve the bear and the people of Idaho than a primitive category. (Organization, #757.4.20000.400)

2-175 Public Concern: The Forest Service should reclassify the Oxford Roadless Area to the Backcountry/Restoration management theme.

TO PROTECT THE SUMMER RANGE HABITAT OF BIG GAME SPECIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Oxford [In Caribou National Forest] Recommend moving to Backcountry Restoration in Idaho rule because: [It is] Large, in-tact Roadless Area with outstanding mule deer hunting and a growing elk herd. In the Downey and Malad City area, none of the Roadless Areas are currently in Backcountry Restoration in their entirety, yet these areas have some of the most important range vegetation for big game in southern Idaho: It makes sense to move this area into Backcountry Restoration in its entirety; According to Idaho Fish and Game, "This area is one of the larger core big game security areas for deer, elk and moose. Additional roads would greatly increase vulnerability of big game animals in this area." (IDFG Caribou NF Roadless Summary). Idaho Fish and Game identified crucial mule deer, moose, and elk summer range; (Organization, #1817.38.23500.351)

BECAUSE THE AREA PROVIDES LOW-DENSITY MOTORIZED ACCESS

[Specific Idaho Roadless Area Category Change Recommendations for:] Oxford [In Caribou National Forest] Recommend moving to Backcountry Restoration in Idaho rule because: [It] Provides low density backcountry motorized trail access for local area and out-of-state visitors. (Organization, #1817.39.23500.530)

BECAUSE THE AREA CONTAINS BONNEVILLE CUTTHROAT TROUT

[Specific Idaho Roadless Area Category Change Recommendations for:] Oxford [In Caribou National Forest] Recommend moving to Backcountry Restoration in Idaho rule because:[It] Contains Bonneville Cutthroat Trout. (Organization, #1817.40.23500.352)

BECAUSE THE AREA PROVIDES CLEAN WATER

[Specific Idaho Roadless Area Category Change Recommendations for:] Oxford [In Caribou National Forest] Recommend moving to Backcountry Restoration in Idaho rule because:[It provides] important clean water source for local ranches and Deep Creek Reservoir. (Organization, #1817.41.23500.241)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Oxford [In Caribou National Forest] Recommend moving to Backcountry Restoration in Idaho rule because: Large majority managed as "6.2 - Rangeland Vegetative Management" in the Caribou National Forest Plan with a primary goal to "Maintain and restore ecological processes and functions." Such a management category is best matched with the Backcountry Restoration category. Small area around Oxford peak in 5.2 Forest Vegetative Management category. (Organization, #1817.42.23500.160)

2-176 Public Concern: The Forest Service should reclassify the Elkhorn Roadless Area to Backcountry/Restoration.

BECAUSE THE AREA PROVIDES OUTSTANDING MULE DEER HUNTING

[Specific Idaho Roadless Area Category Change Recommendations for:] Elkhorn [In Caribou National Forest] Recommend moving to Backcountry Restoration in Idaho rule [because]:[It is] Large, intact Roadless Area with outstanding mule deer hunting. (Organization, #1817.47.23500.560)

BECAUSE THE AGENCY RATES THE RATES THE NATURAL INTEGRITY AS HIGH

[Specific Idaho Roadless Area Category Change Recommendations for:] Elkhorn [In Caribou National Forest] Recommend moving to Backcountry Restoration in Idaho rule [because]:[Of] Naturalness of this area is considered "High" by the Forest Service. (Organization, #1817.48.23500.206)

BECAUSE THE AREA PROVIDES LOW-DENSITY MOTORIZED ACCESS

[Specific Idaho Roadless Area Category Change Recommendations for:] Elkhorn [In Caribou National Forest] Recommend moving to Backcountry Restoration in Idaho rule [because]:[It] Provides low-

density backcountry motorized trail access for local area and out-of-state visitors. (Organization, #1817.49.23500.530)

BECAUSE THE AREA PROVIDES CLEAN WATER

[Specific Idaho Roadless Area Category Change Recommendations for:] Elkhorn [In Caribou National Forest] Recommend moving to Backcountry Restoration in Idaho rule [because]: [It is an] Important clean water source for Devil Creek Reservoir. (Organization, #1817.50.23500.241)

TO PROTECT THE MIGRATION CORRIDOR AND SUMMER RANGE OF BIG GAME SPECIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Elkhorn [In Caribou National Forest] Recommend moving to Backcountry Restoration in Idaho rule [because]: In the Downey and Malad City area, none of the Roadless Areas are currently in Backcountry Restoration in their entirety, yet these areas have some of the most important range vegetation for big game in southern Idaho; This area provides an important big game north/south migration corridor for animals to travel between summer and winter range (IDFG Caribou National Forest Roadless Summary); It makes sense to move this area into Backcountry Restoration in its entirety. Idaho Fish and Game identified crucial elk, moose, mule deer summer habitat. (Organization, #1817.51.23500.351)

BECAUSE THE AREA CONTAINS BONNEVILLE CUTTHROAT TROUT

[Specific Idaho Roadless Area Category Change Recommendations for:] Elkhorn [In Caribou National Forest] Recommend moving to Backcountry Restoration in Idaho rule [because]: [It] Contains Bonneville cutthroat trout. (Organization, #1817.52.23400.352)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Elkhorn [In Caribou National Forest] Recommend moving to Backcountry Restoration in Idaho rule [because]: [It is] Managed as “6.2 - Rangeland Vegetative Management” in the Caribou National Forest Plan with a primary goal to “Maintain and restore ecological processes and functions.” Such a management category is best matched with the Backcountry Restoration category. (Organization, #1817.53.23500.160)

2-177 Public Concern: The Forest Service should reclassify the Garns Mountain Roadless Area from Backcountry/Restoration to Primitive or Wild Land/Recreation.

TO PRESERVE POPULATIONS OF NATIVE YELLOWSTONE CUTTHROAT TROUT AND MOOSE

In the Targhee, I would ask you to reconsider the designation given to the Garns Mountain Roadless Area. Listed for protective status under the Backcountry Restoration category, this unique piece of roadless land is deserving of increased protection, based on its native Yellowstone cutthroat trout population (Rainey Creek is one of the most important spawning tributaries to the South Fork of the Snake River) and its moose population, which is likely unrivaled in the area. Again, please consider these important assets and reclassify Garns Mountain to either “primitive” or “Wild Land/Recreation.” (Individual, #17.3.23100.350)

General Forest to Backcountry/Restoration

2-178 Public Concern: The Forest Service should reclassify unroaded and unlogged areas from General Forest to Backcountry/Restoration.

Areas of General Forest that have not been logged and roaded should be transferred to the Backcountry Restoration category. Many General Forest areas such as Red Mountain and Toponce in the Caribou NF have extremely high-quality backcountry values with no roads or timber harvest and have qualities similar to those found in the Primitive designation. Other areas such as Hell Hole in the Caribou NF have been significantly altered and should remain in the General Forest inventory. The Caribou, Targhee, and Sawtooth NF have the largest number of General Forest acres of General Forest that are

most appropriate for the Backcountry Restoration or higher management categories. (Organization, #1817.20.23500.206)

2-179 Public Concern: The Forest Service should reclassify Roadless Areas from General Forest to Backcountry/Restoration.

TO BE MORE CONSISTENT WITH EXISTING FOREST PLANS

In conducting our [Theodore Roosevelt Conservation Partnership] analysis, we compared the current Forest Plans to the areas proposed for inclusion in the General Forest theme. It is important to note that we have only evaluated the Caribou and Targhee National Forest Plans, but our conclusions and cursory examinations lead us to believe that similar situations exist in other Idaho National Forests.

When looking at this comparison, we found that many of the areas proposed for inclusion in the General Forest theme have management goals and guidelines under current Forest Plans that are similar to the goals and guidelines of the Backcountry/Restoration theme. However, the DEIS moves these areas to the General Forest theme. If the Idaho Rule is intending to prescribe management guidelines consistent with Forest Plans, then it is our opinion that many of the areas currently in the General Forest theme would be more appropriately designated for the Backcountry/Restoration theme. (Recreation/Conservation Organization, Missoula, MT - #1798.1.23500.160)

2-180 Public Concern: The Forest Service should reclassify areas in southern Idaho from General Forest to Backcountry/Restoration.

TO PROTECT SAGE-GROUSE

By moving General Forest areas to Backcountry/Restoration in southern Idaho, the State and USFS will show a commitment to the future recovery of sage grouse and will help prevent listing under the Endangered Species Act (ESA). Many Roadless Areas in the Caribou and Targhee National Forests hold important sage grouse habitat. Sage grouse are currently being considered for listing under the ESA and the subsequent management actions of managing areas in General Forest in the Caribou and Targhee National Forests could further the decline of sage grouse in Idaho, contributing to a rationale for listing. Further, moving these Roadless Areas to General Forest could be perceived by those making decisions about listing as a lack of commitment to sage grouse recovery. In order to help prevent sage grouse from being listed under the Endangered Species Act, areas designated as 6.2 Rangeland Vegetation Management under the Caribou Forest Plan and areas designated as 6.1 Range management under the Targhee Forest Plan should be transferred to the Backcountry/Restoration theme or higher in the Idaho Rule. (Recreation/Conservation Organization, Missoula, MT - #1796.28.23500.135)

2-181 Public Concern: The Forest Service should reclassify areas in the Caribou National Forest from General Forest to Backcountry/Restoration.

Backcountry Designation Should Be Further Examined. BRC [Blue Ribbon Coalition] supports further examination of theme designations, such as possibly moving some theme areas from General Forest, Rangeland, and Grassland to Backcountry[/Restoration], especially in the Caribou National Forest. (Organization, #1801.2.23100.1)

I'm very encouraged about the Plan that ex-Governor Risch proposed and that we're executing here. What I don't particularly care for is the inequitable distribution or allocation of resources of the Targhee National Forest [and the] Caribou National Forest.

If you take a look at the Plan, that forest represents 17 percent of the Idaho forest, but 65 percent of the General Forest category, which is the least protective and the least restrictive. I think that's wrong. The reason I think it's wrong is that I've see degrading of the environment, not due to any particular thing other than we have more people, more farming, more land, more mining, more of everything, and what I'm going to argue is what we ought to see more of that 400,000 acres, actually 398,000 acres moved into the Backcountry/Restoration category. (Individual, Pocatello, ID - #9142.1.23500.200)

2-182 Public Concern: The Forest Service should reclassify the northern part of Napoleon Ridge from General Forest to Backcountry/Restoration.

TO ENSURE THAT TIMBER HARVEST DOES NOT NEGATIVELY AFFECT VISUAL RESOURCES

We [Lemhi County Board of Supervisors] feel that recreational opportunities are an area that deserves special consideration from local government. It is helpful to remember that eighty percent of the Salmon-Challis National Forest is classified as wilderness or roadless, so such opportunities are far from in short supply. However, the governor's petition designated the northern part of Napoleon Ridge as general forest. Since this area overlooks the drainage of the main Salmon River, timber harvest could have a negative impact on the scenery that river-based tourists have come to expect. We therefore recommend that this area be reclassified as Backcountry/Restoration. (Government, #584.12.23500.500)

2-183 Public Concern: The Forest Service should reclassify portions of the Toponce Roadless Area from General Forest to Backcountry/Restoration.

TO PROTECT ITS LONG-TERM ROADLESS VALUES, OPPORTUNITIES FOR ANGLING AND HUNTING, AND POPULATIONS OF NATIVE CUTTHROAT TROUT

Toponce (Caribou/Targhee NF): Trout Unlimited recommends moving the 9800 acres proposed for GFRG in this IRA [Inventoried Roadless Area] to the Backcountry Theme to protect its long term roadless values. This area is an important backcountry recreation area for the Pocatello/Idaho Falls region and is one of the best opportunities for remote big game hunting and angling in the immediate area. In addition, the headwaters of Toponce Creek contain a strong population of native cutthroat trout and it's an important tributary to the Portneuf River. (Organization, #1700.11.23500.560)

2-184 Public Concern: The Forest Service should reclassify the roadless portions of the ridges of the Kootenai Valley from General Forest to Backcountry/Restoration.

BECAUSE THESE AREAS ARE STEEP, PROVIDE LITTLE COMMERICALLY VIABLE TIMBER, HAVE SCENIC CHARACTERISTICS, AND PROVIDE HABITAT FOR MULE DEER

My suggestions to strengthen the new rules for the northern panhandle: I believe the roadless portions of ridges facing east along the Kootenai Valley north and south of Trout Creek should be Backcountry/Restoration and not General Forest Lands as proposed. These slopes are very steep and rocky with little accessible commercial timber. They offer a beautiful backdrop for the Valley and are favorable winter and summer range for mule deer. (Individual, #1939.11.20000.600)

2-185 Public Concern: The Forest Service should reclassify the General Forest acres in the Meade Peake Roadless Area to Backcountry/Restoration.

EXCEPT FOR THE ACRES IN THE KNOWN PHOSPHATE LEASE AREAS

[Specific Idaho Roadless Area Category Change Recommendations for:] Meade Peak [In Caribou National Forest] Recommend 28,600 acres in General Forest to be moved to Backcountry Restoration because:[But] Leave 2,500 acres located in KPLA [Known Phosphate Leasing Areas] in General Forest. (Organization, #1817.54.23500.423)

BECAUSE THERE ARE THREE MOTORIZED TRAILS, BUT NO ROADS

[Specific Idaho Roadless Area Category Change Recommendations for:] Meade Peak [In Caribou National Forest] Recommend 28,600 acres in General Forest to be moved to Backcountry Restoration because:[It has] 3 Motorized trails but no roads. (Organization, #1817.55.23500.206)

BECAUSE MEADE PEAK IS THE TALLEST PEAK IN THE CARIBOU NATIONAL FOREST

[Specific Idaho Roadless Area Category Change Recommendations for:] Meade Peak [In Caribou National Forest] Recommend 28,600 acres in General Forest to be moved to Backcountry Restoration

because: Meade Peak is the tallest peak in the Caribou National Forest. (Organization, #1817.56.23500.550)

BECAUSE THE AREA CONTAINS BONNEVILLE CUTTHROAT TROUT

[Specific Idaho Roadless Area Category Change Recommendations for:] Meade Peak [In Caribou National Forest] Recommend 28,600 acres in General Forest to be moved to Backcountry Restoration because:[it] Contains Bonneville cutthroat trout. (Organization, #1817.57.23500.352)

BECAUSE IT IS A DESTINATION RECREATION AREA

[Specific Idaho Roadless Area Category Change Recommendations for:] Meade Peak [In Caribou National Forest] Recommend 28,600 acres in General Forest to be moved to Backcountry Restoration because: [it is a] Destination recreation area for southeast Idaho and out-of-state residents. (Organization, #1817.58.23500.500)

BECAUSE THE AREA PROVIDES SUMMER HABITAT FOR ELK, MULE DEER, AND MOOSE

[Specific Idaho Roadless Area Category Change Recommendations for:] Meade Peak [In Caribou National Forest] Recommend 28,600 acres in General Forest to be moved to Backcountry Restoration because: Idaho Fish and Game identified crucial elk, mule deer, and moose summer habitat here. (Organization, #1817.59.23500.351)

BECAUSE THE AREA PROVIDES BIG GAME HUNTING OPPORTUNITIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Meade Peak [In Caribou National Forest] Recommend 28,600 acres in General Forest to be moved to Backcountry Restoration because:[it contains] Excellent big game hunting, including a population of black bears. According to Idaho Fish and Game, "This area is one of the larger core big game security areas for deer, elk and moose. Additional roads would greatly increase vulnerability of big game animals in this area" (IDFG Caribou NF Roadless Summary). (Organization, #1817.60.23500.560)

BECAUSE IT IS ONE OF THE LARGEST GENERAL FOREST AREAS EAST OF GEORGETOWN

[Specific Idaho Roadless Area Category Change Recommendations for:] Meade Peak [In Caribou National Forest] Recommend 28,600 acres in General Forest to be moved to Backcountry Restoration because:[it is] One of the largest General Forest areas east of Georgetown. (Organization, #1817.61.23500.620)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Meade Peak [In Caribou National Forest] Recommend 28,600 acres in General Forest to be moved to Backcountry Restoration because:[it is] Managed as "6.2 - Rangeland Vegetative Management" in the Caribou NF Plan with a primary goal to "Maintain and restore ecological processes and functions." Such a management category is best matched with the Backcountry Restoration category. (Organization, #1817.62.23300.160)

2-186 Public Concern: The Forest Service should reclassify the General Forest acres in the Mount Naomi Roadless Area to Backcountry/Restoration.

TO CREATE A BUFFER BETWEEN WILDERNESS QUALITY LANDS AND NON-ROADLESS LANDS

[Specific Idaho Roadless Area Category Change Recommendations for:] Mt. Naomi: [In Caribou National Forest]Request 2,200 acres currently in General Forest be moved to Backcountry Restoration because:[it is] Contiguous with Wild Land Recreation - moving to Backcountry Restoration creates a buffer between wilderness quality lands and non- roadless lands; Naturalness considered "very high" by the Forest Service. (Organization, #1817.67.23500.206)

BECAUSE THE ACRES PROVIDE CONNECTIONS BETWEEN MOUNTAIN RANGES

[Specific Idaho Roadless Area Category Change Recommendations for:] Mt. Naomi:[In Caribou National Forest]Request 2,200 acres currently in General Forest be moved to Backcountry Restoration because:" This area links the Northern end of the Wasatch and Bear River Mountain ranges with the Southern Wasatch mountains, and the Cache National Forest to the Caribou, allowing wildlife travel

through the entire mountain range” (IDFG Caribou National Forest Roadless Summary). (Organization, #1817.68.23500.331)

TO PROTECT BIG GAME HUNTING OPPORTUNITIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Mt. Naomi: [In Caribou National Forest] Request 2,200 acres currently in General Forest be moved to Backcountry Restoration because: According to ID Fish and Game, “With the creation of new roads, big game security areas would decrease in size. This may result in the IDFG reducing hunter numbers to meet big game management objectives” (IDFG Caribou National Forest Roadless Summary). Idaho Fish and Game identified crucial elk, moose, and mule deer summer habitat here. (Organization, #1817.69.23500.560)

BECAUSE THE AREA CONTAINS BONNEVILLE CUTTHROAT TROUT

[Specific Idaho Roadless Area Category Change Recommendations for:] Mt. Naomi: [In Caribou National Forest] Request 2,200 acres currently in General Forest be moved to Backcountry Restoration because: [it] Contains Bonneville Cutthroat Trout. (Organization, #1817.70.23500.352)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Mt. Naomi: [In Caribou National Forest] Request 2,200 acres currently in General Forest be moved to Backcountry Restoration because: 5.2 Forest Vegetative Management in Caribou National Forest Plan. (Organization, #1817.71.23500.160)

2-187 Public Concern: The Forest Service should reclassify the General Forest acres in the Bonneville Peak Roadless Area to Backcountry/Restoration.

BECAUSE IT IS AN INTACT ROADLESS AREA AND RECLASSIFICATION IS CONSISTENT WITH THE REST OF THE ROADLESS AREA

[Specific Idaho Roadless Area Category Change Recommendations for:] Bonneville Peak: [In Caribou National Forest] Recommend moving General Forest area to Backcountry Restoration in Idaho rule because [it contains] intact Roadless Area with no roads. Naturalness is considered “High” by the Forest Service; Moving General Forest portion to Backcountry Restoration will move into consistency with rest of this Roadless Area. (Organization, #1817.72.23500.206)

BECAUSE THE AREA IS AN IMPORTANT RECREATION CENTER AND PROVIDES LOW-DENSITY MOTORIZED RECREATION ALONG WITH LARGE NON-MOTORIZED AREAS

[Specific Idaho Roadless Area Category Change Recommendations for:] Bonneville Peak: [In Caribou National Forest] Recommend moving General Forest area to Backcountry Restoration in Idaho rule because. Bonneville Peak is a lofty landmark that rises to 9,260 ft; Important and popular recreation center for the cities of Pocatello, Inkom, McCammon, & Lava; Low density motorized trail riding opportunities and big areas of non-motorized habitat. (Organization, #1817.73.23500.500)

TO PROTECT BIG GAME HUNTING OPPORTUNITIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Bonneville Peak: [In Caribou National Forest] Recommend moving General Forest area to Backcountry Restoration in Idaho rule because. According to Idaho Fish and Game, the “buck ratios are low in this area. With the creation of new roads, big game security areas would decrease in size. This may result in the IDFG reducing hunter numbers to meet big game management objectives” (IDFG Caribou National Forest Roadless Summary). (Organization, #1817.74.23500.560)

BECAUSE THE ACRES PROVIDE CRUCIAL ELK AND MULE DEER SUMMER HABITAT

[Specific Idaho Roadless Area Category Change Recommendations for:] Bonneville Peak: [In Caribou National Forest] Recommend moving General Forest area to Backcountry Restoration in Idaho rule because. It makes sense to move this area into Backcountry Restoration in its entirety; Idaho Fish and Game identified crucial elk and mule deer summer habitat. (Organization, #1817.75.23500.352)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Bonneville Peak: [In Caribou National Forest] Recommend moving General Forest area to Backcountry Restoration in Idaho rule because:[it is] Managed as “6.2-Rangeland Vegetative Management” in the Caribou National Forest Plan with a primary goal to “Maintain and restore ecological processes and functions.” Such a management category is best matched with the Backcountry Restoration category. (Organization, #1817.76.23500.160)

2-188 Public Concern: The Forest Service should reclassify the General Forest acres in the Gannett-Spring Peak Roadless Area to Backcountry/ Restoration.

BECAUSE THE ACRES ARE ROADLESS AND SERVE AS A WILDLIFE CORRIDOR INTO WYOMING

[Specific Idaho Roadless Area Category Change Recommendations for:] Gannett-Spring Creek: [In Caribou National Forest] Recommend moving General Forest area in Western Portion on northern end of Primitive Designated area to Backcountry Restoration in Idaho rule because:[it contains] No roads; This area connects designated primitive areas within Idaho rule and creates wildlife movement corridor into Wyoming. (Organization, #1817.77.23500.331)

BECAUSE THE ACRES CONTAIN BONNEVILLE CUTTHROAT TROUT

[Specific Idaho Roadless Area Category Change Recommendations for:] Gannett-Spring Creek: [In Caribou National Forest] Recommend moving General Forest area in Western Portion on northern end of Primitive Designated area to Backcountry Restoration in Idaho rule because:[it] Contains Bonneville cutthroat trout. (Organization, #1817.78.23500.352)

TO PRESERVE BIG GAME HUNTING OPPORTUNITIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Gannett-Spring Creek: [In Caribou National Forest] Recommend moving General Forest area in Western Portion on northern end of Primitive Designated area to Backcountry Restoration in Idaho rule because: According to ID Fish and Game, “With the creation of new roads, big game security areas would decrease in size. This may result in the IDFG reducing hunter numbers to meet big game management objectives” (IDFG Caribou National Forest Roadless Summary). (Organization, #1817.79.23500.560)

BECAUSE THE ACRES CONTAIN LOW-DENSITY MOTORIZED TRAILS

[Specific Idaho Roadless Area Category Change Recommendations for:] Gannett-Spring Creek: [In Caribou National Forest] Recommend moving General Forest area in Western Portion on northern end of Primitive Designated area to Backcountry Restoration in Idaho rule because:[it contains] Low density motorized backcountry trail riding opportunities. (Organization, #1817.80.23500.530)

BECAUSE THE ACRES PROVIDE CRUCIAL ELK, MOOSE, AND MULE DEER SUMMER HABITAT

[Specific Idaho Roadless Area Category Change Recommendations for:] Gannett-Spring Creek: [In Caribou National Forest] Recommend moving General Forest area in Western Portion on northern end of Primitive Designated area to Backcountry Restoration in Idaho rule because: Idaho Fish and Game identified crucial elk, moose, and mule deer summer habitat (IDFG Caribou National Forest crucial habitat mapping). (Organization, #1817.81.23500.351)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Gannett-Spring Creek: [In Caribou National Forest] Recommend moving General Forest area in Western Portion on northern end of Primitive Designated area to Backcountry Restoration in Idaho rule because: [it is] Managed as “6.2 - Rangeland Vegetative Management” in the Caribou National Forest Plan with a primary goal to “Maintain and restore ecological processes and functions.” Such a management category is best matched with the Backcountry Restoration category. (Organization, #1817.82.23500.160)

2-189 Public Concern: The Forest Service should reclassify the portion of the Station Creek Roadless Area located east of Forest Road 406 from General Forest to Backcountry/Restoration.

BECAUSE THE AGENCY RATES THE NATURAL INTEGRITY AS HIGH

[Specific Idaho Roadless Area Category Change Recommendations for:] Station Creek - General Forest portion east of Forest Road 406: Recommend moving above described portion of this Roadless Area in General Forest to Backcountry Restoration in Idaho rule because: [The] Naturalness of area [is] considered “high” by the Forest Service. (Organization, #1817.83.23500.206)

BECAUSE THE AREA IS CONTIGUOUS WITH THE BLOOMINGTON LAKES SPECIAL AREA

[Specific Idaho Roadless Area Category Change Recommendations for:] Station Creek - General Forest portion east of Forest Road 406: Recommend moving above described portion of this Roadless Area in General Forest to Backcountry Restoration in Idaho rule because: [It is] Contiguous with Bloomington lakes special area. (Organization, #1817.84.23500.630)

BECAUSE THE AREA PROVIDES CRUCIAL SUMMER HABITAT FOR MULE DEER AND ELK

[Specific Idaho Roadless Area Category Change Recommendations for:] Station Creek - General Forest portion east of Forest Road 406: Recommend moving above described portion of this Roadless Area in General Forest to Backcountry Restoration in Idaho rule because: Idaho Fish and Game identified crucial mule deer and elk summer range here. (Organization, #1817.85.23500.351)

BECAUSE THE AREA CONTAINS BONNEVILLE CUTTHROAT TROUT

[Specific Idaho Roadless Area Category Change Recommendations for:] Station Creek - General Forest portion east of Forest Road 406: Recommend moving above described portion of this Roadless Area in General Forest to Backcountry Restoration in Idaho rule because: [it] Contains Bonneville Cutthroat Trout. (Organization, #1817.86.23500.352)

BECAUSE THE AREA IS AN IMPORTANT RECREATION AREA

[Specific Idaho Roadless Area Category Change Recommendations for:] Station Creek - General Forest portion east of Forest Road 406: Recommend moving above described portion of this Roadless Area in General Forest to Backcountry Restoration in Idaho rule because: [it is] Important recreation area for Southeast Idaho and out-of-state residents. (Organization, #1817.87.23500.500)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Station Creek - General Forest portion east of Forest Road 406: Recommend moving above described portion of this Roadless Area in General Forest to Backcountry Restoration in Idaho rule because: [It is] Managed as “6.2 - Rangeland Vegetative Management” in the Caribou National Forest Plan with a primary goal to “Maintain and restore ecological processes and functions.” Such a management category is best matched with the Backcountry Restoration category. (Organization, #1817.88.23500.160)

2-190 Public Concern: The Forest Service should reclassify the portion of the Station Creek Roadless Area located west of Forest Road 406 from General Forest to Backcountry/Restoration.

BECAUSE THE AGENCY RATES THE NATURAL INTEGRITY AS HIGH

[Specific Idaho Roadless Area Category Change Recommendations for:] Station Creek - General Forest portion to West of Forest Road 406: Recommend moving above described portion of this Roadless Area in General Forest to Backcountry Restoration in Idaho rule because; [The] Naturalness of area considered “high” by the Forest Service. (Organization, #1817.104.23500.206)

BECAUSE THE AREA CONTAINS BONNEVILLE CUTTHROAT TROUT

[Specific Idaho Roadless Area Category Change Recommendations for:] Station Creek - General Forest portion to West of Forest Road 406: Recommend moving above described portion of this Roadless Area

in General Forest to Backcountry Restoration in Idaho rule because; [it] Contains Bonneville Cutthroat Trout. (Organization, #1817.105.23500.352)

BECAUSE THE AREA PROVIDES CRUCIAL SUMMER RANGE HABITAT FOR MULE DEER AND ELK

[Specific Idaho Roadless Area Category Change Recommendations for:] Station Creek - General Forest portion to West of Forest Road 406: Recommend moving above described portion of this Roadless Area in General Forest to Backcountry Restoration in Idaho rule because; Idaho Fish and Game identified crucial mule deer and elk summer range here. (Organization, #1817.106.23500.351)

BECAUSE IT IS AN IMPORTANT RECREATION AREA

[Specific Idaho Roadless Area Category Change Recommendations for:] Station Creek - General Forest portion to West of Forest Road 406: Recommend moving above described portion of this Roadless Area in General Forest to Backcountry Restoration in Idaho rule because; [it is] Important recreation area for Southeast Idaho and out-of-state residents. (Organization, #1817.107.23500.500)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Station Creek - General Forest portion to West of Forest Road 406: Recommend moving above described portion of this Roadless Area in General Forest to Backcountry Restoration in Idaho rule because; [it is] Managed as “6.2-Rangeland Vegetative Management” in the Caribou National Forest Plan with a primary goal to “Maintain and restore ecological processes and functions.” Such a management category is best matched with the Backcountry Restoration category. (Organization, #1817.108.23500.160)

2-191 Public Concern: The Forest Service should reclassify the Deep Creek Roadless Area from General Forest to Backcountry/Restoration.

[Specific Idaho Roadless Area Category Change Recommendations for:] Deep Creek -Caribou National Forest: Recommend moving General Forest to Backcountry Restoration in Idaho rule because: It makes sense to move this area into Backcountry Restoration in its entirety. (Organization, #1817.96.23500.720)

BECAUSE THE AREA IS AN INTACT ROADLESS AREA

[Specific Idaho Roadless Area Category Change Recommendations for:] Deep Creek -Caribou National Forest: Recommend moving General Forest to Backcountry Restoration in Idaho rule because: [It is on] Intact Roadless Area with no roads; Current plan creates small area of backcountry restoration, while not conserving the heart of the Roadless Area. (Organization, #1817.89.23500.206)

BECAUSE THE AREA PROVIDES BIG GAME HUNTING OPPORTUNITIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Deep Creek -Caribou National Forest: Recommend moving General Forest to Backcountry Restoration in Idaho rule because:[it contains] Outstanding mule deer hunting and a small, but growing elk herd. (Organization, #1817.90.23500.560)

BECAUSE THE AREA CONTAINS BONNEVILLE CUTTHROAT TROUT

[Specific Idaho Roadless Area Category Change Recommendations for:] Deep Creek -Caribou National Forest: Recommend moving General Forest to Backcountry Restoration in Idaho rule because: [it] Contains Bonneville cutthroat trout. (Organization, #1817.91.23000.352)

BECAUSE THE AREA PROVIDES CLEAN WATER

[Specific Idaho Roadless Area Category Change Recommendations for:] Deep Creek -Caribou National Forest: Recommend moving General Forest to Backcountry Restoration in Idaho rule because: [It is an] Important clean water source for Weston Creek reservoir. (Organization, #1817.92.23500.241)

BECAUSE THE AREA IS A MIGRATION CORRIDOR

[Specific Idaho Roadless Area Category Change Recommendations for:] Deep Creek -Caribou National Forest: Recommend moving General Forest to Backcountry Restoration in Idaho rule because: This area provides an important big game north/south and east/west migration corridors for animals to travel

between summer and winter range (IDFG Caribou National Forest Roadless Summary). (Organization, #1817.93.23500.351)

BECAUSE THE AREA PROVIDES LOW-DENSITY MOTORIZED RECREATION OPPORTUNITIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Deep Creek -Caribou National Forest: Recommend moving General Forest to Backcountry Restoration in Idaho rule because: [it] Provides low density backcountry motorized trail access for local area and Salt Lake City residents. (Organization, #1817.94.23500.530)

BECAUSE THE AREA PROVIDES IMPORTANT RANGE VEGETATION FOR BIG GAME SPECIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Deep Creek-Caribou National Forest: Recommend moving General Forest to Backcountry Restoration in Idaho rule because: In the Downey and Malad City area, none of the Roadless Areas are currently in Backcountry Restoration in their entirety, yet these areas have some of the most important range vegetation for big game in southern Idaho. (Organization, #1817.95.23500.335)

BECAUSE THE AREA PROVIDES CRUCIAL SUMMER HABITAT FOR ELK, MOOSE, AND MULE DEER

[Specific Idaho Roadless Area Category Change Recommendations for:] Deep Creek -Caribou National Forest: Recommend moving General Forest to Backcountry Restoration in Idaho rule because: Idaho Fish and Game identified crucial elk, moose, and mule deer summer habitat [here]. (Organization, #1817.97.23500.351)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Deep Creek -Caribou National Forest: [It is] Managed as “6.2 - Rangeland Vegetative Management” in the Caribou National Forest Plan with a primary goal to “Maintain and restore ecological processes and functions.” Such a management category is best matched with the Backcountry Restoration category. (Organization, #1817.98.23500.160)

2-192 Public Concern: The Forest Service should reclassify the Soda Point Roadless Area from General Forest to Backcountry/Restoration.

BECAUSE THE AREA PROVIDES BACKCOUNTRY MOTORIZED RECREATION OPPORTUNITIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Soda Point -Caribou National Forest: Recommend moving General Forest area to Backcountry Restoration in Idaho rule because: [It] Provides backcountry motorized trail experiences for the community of Soda Springs. (Organization, #1817.99.23500.530)

BECAUSE THE AREA IS AN IMPORTANT PART OF THE BEAR RIVER RANGE

[Specific Idaho Roadless Area Category Change Recommendations for:] Soda Point -Caribou National Forest: Recommend moving General Forest area to Backcountry Restoration in Idaho rule because: [It is] Important northern area of the Bear River Range. (Organization, #1817.100.23500.331)

BECAUSE THE AREA CONTAINS BONNEVILLE CUTTHROAT TROUT

[Specific Idaho Roadless Area Category Change Recommendations for:] Soda Point -Caribou National Forest: Recommend moving General Forest area to Backcountry Restoration in Idaho rule because: [It] Contains Bonneville Cutthroat Trout. (Organization, #1817.101.23500.352)

BECAUSE THE AREA PROVIDES CRUCIAL SUMMER RANGE HABITAT FOR MULE DEER AND ELK

[Specific Idaho Roadless Area Category Change Recommendations for:] Soda Point -Caribou National Forest: Recommend moving General Forest area to Backcountry Restoration in Idaho rule because: Idaho Fish and Game identified crucial mule deer and elk summer range here. (Organization, #1817.102.23500.351)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Soda Point -Caribou National Forest: Recommend moving General Forest area to Backcountry Restoration in Idaho rule because: [It is under] 5.2 Forest Vegetative Management in Caribou National Forest Plan. (Organization, #1817.103.23500.160)

2-193 Public Concern: The Forest Service should reclassify the Clarkston Mountain Roadless Area from General Forest to Backcountry/ Restoration.

BECAUSE THE AREA IS LARGELY INTACT

[Specific Idaho Roadless Area Category Change Recommendations for:] Clarkston Mountain-[Caribou National Forest] Recommend moving General Forest area to Backcountry Restoration because; [it is] Largely in-tact, with easily adjustable southern boundary, which should have a slight portion to remain in General Forest or be cherry stemmed for Forest Road 1096 that cuts into a small area of the Roadless Area. (Organization, #1817.109.23600.680)

TO PROVIDE THE SAME LEVEL OF PROTECTION FOR THE HEART OF THE AREA AS THE PERIMETER

[Specific Idaho Roadless Area Category Change Recommendations for:] Clarkston Mountain-[Caribou National Forest] Recommend moving General Forest area to Backcountry Restoration because; [The] Current plan leaves heart of this Roadless Area in General Forest, while circling its perimeter with backcountry restoration. (Organization, #1817.110.23500.200)

BECAUSE THE AREA PROVIDES BIG GAME HUNTING OPPORTUNITIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Clarkston Mountain-[Caribou National Forest] Recommend moving General Forest area to Backcountry Restoration because; [It contains] Outstanding big game hunting. (Organization, #1817.111.23500.560)

BECAUSE THE AREA SERVES AS AN IMPORTANT MIGRATION ROUTE

[Specific Idaho Roadless Area Category Change Recommendations for:] Clarkston Mountain-[Caribou National Forest] Recommend moving General Forest area to Backcountry Restoration because; This area provides an important migration route for big-game animals traveling West and South to winter on the Malad Face winter range (IDFG Caribou Roadless Summary). (Organization, #1817.112.23500.351)

BECAUSE THE AREA PROVIDES LOW-DENSITY MOTORIZED RECREATION OPPORTUNITIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Clarkston Mountain- [Caribou National Forest] Recommend moving General Forest area to Backcountry Restoration because; [It] Provides low-density backcountry motorized trail access for local area and out-of-state recreationists. (Organization, #1817.113.23500.530)

TO PRESERVE BIG GAME HUNTING OPPORTUNITIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Clarkston Mountain- [Caribou National Forest] Recommend moving General Forest area to Backcountry Restoration because; According to ID Fish and Game, "With the creation of new roads, big game security areas would decrease in size. This may result in the IDFG reducing hunter numbers to meet big game management objectives" (IDFG Caribou National Forest Roadless Summary). (Organization, #1817.114.23500.560)

BECAUSE THESE AREAS PROVIDE IMPORTANT RANGE VEGETATION FOR BIG GAME SPECIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Clarkston Mountain- [Caribou National Forest] Recommend moving General Forest area to Backcountry Restoration because; In the Downey and Malad City area, none of the Roadless Areas are currently in Backcountry Restoration in their entirety, yet these areas have some of the most important range vegetation for big game in southern Idaho; Idaho Fish and Game identified crucial elk, moose, and mule deer summer habitat (IDFG Caribou National Forest crucial habitat mapping). (Organization, #1817.115.23500.335)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Clarkston Mountain-[Caribou National Forest] Recommend moving General Forest area to Backcountry Restoration because; [It is] Managed as “6.2-Rangeland Vegetative Management” in the Caribou National Forest Plan with a primary goal to “Maintain and restore ecological processes and functions.” Such a management category is best matched with the Backcountry Restoration category. (Organization, #1817.116.23500.160)

2-194 Public Concern: The Forest Service should reclassify the Scout Mountain Roadless Area from General Forest to Backcountry/Restoration.**BECAUSE THE AREA IS LARGELY INTACT**

[Specific Idaho Roadless Area Category Change Recommendations for:] Scout Mountain [Caribou National Forest] Recommend moving General Forest area to Backcountry Restoration; Southern portion of Roadless Area currently in General Forest because: [It is] Largely in-tact, with easily adjustable border on western boundary to remain in General Forest for Forest Road 656 that cuts into a very small area of the Roadless Area, remainder of area should be moved into backcountry restoration. (Organization, #1817.117.23500.680)

BECAUSE THE AREA PROVIDES CRUCIAL SUMMER RANGE HABITAT FOR MULE DEER AND ELK

[Specific Idaho Roadless Area Category Change Recommendations for:] Scout Mountain [Caribou National Forest] Recommend moving General Forest area to Backcountry Restoration; Southern portion of Roadless Area currently in General Forest because: Idaho Fish and Game identified crucial mule deer and elk summer range here. (Organization, #1817.118.23500.351)

BECAUSE THE AREA IS AN IMPORTANT RECREATION AREA

[Specific Idaho Roadless Area Category Change Recommendations for:] Scout Mountain [Caribou National Forest] Recommend moving General Forest area to Backcountry Restoration; Southern portion of Roadless Area currently in General Forest because: [It is] Important local recreation area for city of Pocatello and out-of-state visitors. (Organization, #1817.119.23500.500)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Scout Mountain [Caribou National Forest] Recommend moving General Forest area to Backcountry Restoration; Southern portion of Roadless Area currently in General Forest because: [It is] Managed as “6.2-Rangeland Vegetative Management” in the Caribou National Forest Plan with a primary goal to “Maintain and restore ecological processes and functions.” Such a management category is best matched with the Backcountry Restoration category. (Organization, #1817.120.23500.160)

2-195 Public Concern: The Forest Service should reclassify the Sawtooth Roadless Area from General Forest to Backcountry/Restoration, except for the Independence Lakes area which should be classified as Primitive.**BECAUSE THE AGENCY RATES THE NATURAL INTEGRITY AS HIGH**

[Specific Idaho Roadless Area Category Change Recommendations for:] Sawtooth National Forest: Recommend General Forest area be moved to Backcountry Restoration with exception of Independence Lakes area circled and marked as “P” in the Sawtooth National Forest Travel Map - this portion should be designated as Primitive because: Natural integrity of the area considered “high” by the Forest Service. (Organization, #1817.121.23100.206)

BECAUSE THE AREA PROVIDES VALUABLE RECREATION OPPORTUNITIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Sawtooth National Forest: Recommend General Forest area be moved to Backcountry Restoration with exception of Independence Lakes area circled and marked as “P” in the Sawtooth National Forest Travel Map - this portion should be designated as Primitive because: This Roadless Area provides valuable recreational opportunities for the communities of the Magic Valley and out of state visitors. (Organization, #1817.122.23100.500.)

BECAUSE CACHE PEAK IS THE HIGHEST POINT SOUTH OF THE SNAKE RIVER IN IDAHO AND THE LAKES ARE THE ONLY EXAMPLE OF PATERNOSTER LAKES IN SOUTHERN IDAHO

[Specific Idaho Roadless Area Category Change Recommendations for:] Sawtooth National Forest: Recommend General Forest area be moved to Backcountry/Restoration with exception of Independence Lakes area circled and marked as “P” in the Sawtooth National Forest Travel Map - this portion should be designated as Primitive because: Cache Peak is the highest point south of the Snake River in Idaho. According to Appendix C of the DEIS, “the “Independence Lakes are the only example of paternoster lakes this far south in the state.” (Organization, #1817.123.23500.220)

BECAUSE THE AREA PROVIDES IMPORTANT FISHING OPPORTUNITIES AND BIG GAME HABITAT

[Specific Idaho Roadless Area Category Change Recommendations for:] Sawtooth National Forest: Recommend General Forest area be moved to Backcountry Restoration with exception of Independence Lakes area circled and marked as “P” in the Sawtooth National Forest Travel Map - this portion should be designated as Primitive because: [Of] Important trout fishing opportunities, including native Yellowstone cutthroat trout; Crucial mule deer summer range and outstanding mule deer hunting opportunities. (Organization, #1817.124.23100.560)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Sawtooth National Forest: Recommend General Forest area be moved to Backcountry Restoration with exception of Independence Lakes area circled and marked as “P” in the Sawtooth National Forest Travel Map - this portion should be designated as Primitive because: [It is] Managed as 5.1, Restoration and Maintenance Emphasis within Forested Landscapes in the Sawtooth National Forest Plan. This area is not a part of the suitable timber base and is managed with restoration objectives, making Backcountry Restoration the most appropriate category. (Organization, #1817.125.23100.160)

2-196 Public Concern: The Forest Service should reclassify the Pioneer Mountains Roadless Area from General Forest to Backcountry/Restoration.

TO PROVIDE A BUFFER TO LANDS IDENTIFIED WITH WILDERNESS QUALITIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Pioneer Mountains [Sawtooth National Forest] Recommend General Forest area be moved to Backcountry Restoration because: [This area is] contiguous with Wild-Land Recreation Roadless Areas and a higher management category is needed to provide a buffer to lands identified with wilderness qualities. (Organization, #1817.126.23500.630)

BECAUSE IT IS AN IMPORTANT RECREATION AREA

[Specific Idaho Roadless Area Category Change Recommendations for:] Pioneer Mountains [Sawtooth National Forest] Recommend General Forest area be moved to Backcountry Restoration because: [It is] Important recreation area for Magic Valley residents, Ketchum area residents, and tourists. (Organization, #1817.127.23500.500)

BECAUSE THE AGENCY RATES THE NATURAL INTEGRITY AS BEING HIGH

[Specific Idaho Roadless Area Category Change Recommendations for:] Pioneer Mountains [Sawtooth National Forest] Recommend General Forest area be moved to Backcountry Restoration because: [The] natural integrity is rated as high by the Forest Service. (Organization, #1817.128.23500.206)

BECAUSE THE AREA IS VITAL HABITAT FOR ELK, MULE DEER, BIGHORN SHEEP, AND MOUNTAIN GOATS

[Specific Idaho Roadless Area Category Change Recommendations for:] Pioneer Mountains [Sawtooth National Forest] Recommend General Forest area be moved to Backcountry Restoration because: [It is] vital elk, mule deer, bighorn sheep, and mountain goat habitat. (Organization, #1817.129.23500.351)

BECAUSE THE AREA PROVIDES QUALITY TROUT FISHERIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Pioneer Mountains [Sawtooth National Forest] Recommend General Forest area be moved to Backcountry Restoration because: [Of] quality trout fisheries. (Organization, #1817.130.23500.352)

TO PRESERVE THE HISTORIC MINING RESOURCES

[Specific Idaho Roadless Area Category Change Recommendations for:] Pioneer Mountains [Sawtooth National Forest] Recommend General Forest area be moved to Backcountry Restoration because: Historic mining remnants make this area historically important and worth conserving. (Organization, #1817.131.23500.730)

**BECAUSE THE AREA WAS PROPOSED FOR BACKCOUNTRY/RESTORATION
IN THE STATE PETITION**

[Specific Idaho Roadless Area Category Change Recommendations for:] Pioneer Mountains [Sawtooth National Forest] Recommend General Forest area be moved to Backcountry Restoration because: [This area] was proposed for Backcountry Restoration in the Idaho petition. (Organization, #1817.132.23500.180)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Pioneer Mountains [Sawtooth National Forest] Recommend General Forest area be moved to Backcountry Restoration because: [It is] managed as “6.1-Restoration and Maintenance Emphasis within Shrubland and Grassland Landscapes” in the Sawtooth National Forest Plan with an emphasis on “restoring and maintaining vegetation.” Such a management category is best matched with the Backcountry Restoration category. (Organization, #1817.133.23500.160)

2-197 Public Concern: The Forest Service should reclassify the Mount Harrison Roadless Area from General Forest to Backcountry/Restoration.**BECAUSE THE AREA WAS PROPOSED FOR BACKCOUNTRY/RESTORATION
IN THE STATE PETITION**

[Specific Idaho Roadless Area Category Change Recommendations for:] Mount Harrison [Sawtooth National Forest] Recommend moving General Forest to Backcountry Restoration because: [This area] was proposed for Backcountry Restoration in the Idaho petition. (Organization, #1817.134.23500.180)

BECAUSE THE AREA IS AN IMPORTANT WATER SOURCE FOR DOWNSTREAM USES

[Specific Idaho Roadless Area Category Change Recommendations for:] Mount Harrison [Sawtooth National Forest] Recommend moving General Forest to Backcountry Restoration because: [This area is an] important clean and dependable water source for downstream irrigation, hydropower, and instream trout flows. (Organization, #1817.135.23500.240)

BECAUSE THE MOUNT HARRISON NATURAL AREA IS WITHIN THE BOUNDARY

[Specific Idaho Roadless Area Category Change Recommendations for:] Mount Harrison [Sawtooth National Forest] Recommend moving General Forest to Backcountry Restoration because: A tall landmark, Mt. Harrison reaches 9,263 ft; 300 acre Mt. Harrison Natural Area is within the boundary. (Organization, #1817.136.23500.550)

BECAUSE THE AREA PROVIDES QUALITY BIG GAME HUNTING AND RECREATION OPPORTUNITIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Mount Harrison [Sawtooth National Forest] Recommend moving General Forest to Backcountry Restoration because: Crucial mule deer summer habitat and an important backcountry hunting area here, Big-game hunting is recognized as a major use of the area. An important big game hunting and recreation area for the communities of the Magic Valley. (Organization, #1817.137.23500.560)

BECAUSE THE AREA PROVIDES HIGH-QUALITY RECREATION OPPORTUNITIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Mount Harrison [Sawtooth National Forest] Recommend moving General Forest to Backcountry Restoration because: [This area contains] great family recreation sites near this Roadless Area include Bennett Springs, Howell Canyon, Thompson Flat, Twin Lakes, and Lake Cleveland. Backcountry Restoration in the Mount Harrison Roadless Area will help maintain the quality of recreation in this area. (Organization, #1817.138.23500.500)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Mount Harrison [Sawtooth National Forest] Recommend moving General Forest to Backcountry Restoration because: [It is] managed as “6.1-Restoration and Maintenance Emphasis within Shrubland and Grassland Landscapes” in the Sawtooth National Forest Plan with an emphasis on “restoring and maintaining vegetation.” Such a management category is best matched with the Backcountry Restoration category. (Organization, #1817.139.23500.160)

2-198 Public Concern: The Forest Service should reclassify the Fifth Fork Rock Creek Roadless Area from General Forest to Backcountry/Restoration.

TO MAINTAIN CONSISTENT MANAGEMENT GUIDELINES

[Specific Idaho Roadless Area Category Change Recommendations for:] Fifth Fork Rock Creek [Sawtooth National Forest] Recommend moving General Forest areas to Backcountry Restoration because; [The] Western portion of Fifth Fork Rock Creek is proposed as primitive, makes sense to move the rest of the Roadless Area to Backcountry Restoration in order to maintain consistent management guidelines. (Organization, #1817.140.23500.160)

BECAUSE THE AREA CONTAINS THE ONLY KNOWN STRONG POPULATION OF REDBAND TROUT IN THE FOREST

[Specific Idaho Roadless Area Category Change Recommendations for:] Fifth Fork Rock Creek [Sawtooth National Forest] Recommend moving General Forest areas to Backcountry Restoration because; [The] Fifth Fork contains only known strong population of redband trout in the Sawtooth National Forest. This is an important native trout fishery. (Organization, #1817.141.23500.352)

BECAUSE THE AREA PROVIDES SUMMER AND WINTER HABITAT FOR MULE DEER

[Specific Idaho Roadless Area Category Change Recommendations for:] Fifth Fork Rock Creek [Sawtooth National Forest] Recommend moving General Forest areas to Backcountry Restoration because; [Of] Crucial mule deer summer and winter habitat area. (Organization, #1817.142.23500.351)

BECAUSE THE AREA PROVIDES SOLITUDE AND BIG GAME HUNTING, FISHING, AND RECREATION OPPORTUNITIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Fifth Fork Rock Creek [Sawtooth National Forest] Recommend moving General Forest areas to Backcountry Restoration because; Forest Service recognized “good” opportunities for solitude here. [It is] An important big game hunting, fishing, and recreation area for the communities of the Magic Valley. (Organization, #1817.143.23500.500)

BECAUSE THE AREA WAS PROPOSED FOR BACKCOUNTRY/RESTORATION IN THE STATE PETITION

[Specific Idaho Roadless Area Category Change Recommendations for:] Fifth Fork Rock Creek [Sawtooth National Forest] Recommend moving General Forest areas to Backcountry Restoration because; [It] Was proposed for Backcountry Restoration in the Idaho petition. (Organization, #1817.144.23500.180)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Fifth Fork Rock Creek [Sawtooth National Forest] Recommend moving General Forest areas to Backcountry Restoration because; [This area is] Managed as “6.1-Restoration and Maintenance Emphasis within Shrubland and Grassland Landscapes” in the Sawtooth National Forest Plan with an emphasis on “restoring and maintaining vegetation.” Such a management category is best matched with the Backcountry Restoration category. (Organization, #1817.145.23500.160)

2-199 Public Concern: The Forest Service should reclassify portions of the Mahogany Butte Roadless Area from General Forest to Backcountry/Restoration.

BECAUSE THESE AREAS PROVIDE NON-MOTORIZED BIG-GAME HABITAT

[Specific Idaho Roadless Area Category Change Recommendations for:] Mahogany Butte - North of Carlson Spring & South of Phantom Falls Trailhead [Sawtooth National Forest] Recommend General Forest North of Carlson Spring & South of Phantom Falls, with the exception of the Trout Creek, which is an area south of Carlson Spring and West of the Jay Creek Jeep Road that should also be moved into Backcountry Restoration; Area East of Jay Creek Jeep Road and south of Carlson Spring should be left in General Forest area; Western border recommended as Forest Road 536 and eastern border recommended at Forest Road 535 because: All areas within this described boundary provide important non-motorized backcountry big-game habitat. (Organization, #1817.146.23100.351)

BECAUSE THESE AREAS WERE PROPOSED FOR BACKCOUNTRY/RESTORATION IN THE STATE PETITION

[Specific Idaho Roadless Area Category Change Recommendations for:] Mahogany Butte - North of Carlson Spring & South of Phantom Falls Trailhead [Sawtooth National Forest] Recommend General Forest North of Carlson Spring & South of Phantom Falls, with the exception of the Trout Creek, which is an area south of Carlson Spring and West of the Jay Creek Jeep Road that should also be moved into Backcountry Restoration; Area East of Jay Creek Jeep Road and south of Carlson Spring should be left in General Forest area; Western border recommended as Forest Road 536 and eastern border recommended at Forest Road 535 because: [This areas] Was proposed for Backcountry Restoration in the Idaho petition. (Organization, #1817.147.23100.180)

BECAUSE THESE AREAS HAVE NUMEROUS SPRINGS

[Specific Idaho Roadless Area Category Change Recommendations for:] Mahogany Butte - North of Carlson Spring & South of Phantom Falls Trailhead [Sawtooth National Forest] Recommend General Forest North of Carlson Spring & South of Phantom Falls, with the exception of the Trout Creek, which is an area south of Carlson Spring and West of the Jay Creek Jeep Road that should also be moved into Backcountry Restoration; Area East of Jay Creek Jeep Road and south of Carlson Spring should be left in General Forest area; Western border recommended as Forest Road 536 and eastern border recommended at Forest Road 535 because: This area has numerous springs in a region known for water shortage issues. (Organization, #1817.148.23100.241)

BECAUSE PHANTOM FALLS IS AN IMPORTANT HIKING DESTINATION

[Specific Idaho Roadless Area Category Change Recommendations for:] Mahogany Butte - North of Carlson Spring & South of Phantom Falls Trailhead [Sawtooth National Forest] Recommend General Forest North of Carlson Spring & South of Phantom Falls, with the exception of the Trout Creek, which is an area south of Carlson Spring and West of the Jay Creek Jeep Road that should also be moved into Backcountry Restoration; Area East of Jay Creek Jeep Road and south of Carlson Spring should be left in General Forest area; Western border recommended as Forest Road 536 and eastern border recommended at Forest Road 535 because: Phantom Falls provides an important hiking destination. (Organization, #1817.149.23100.510)

BECAUSE THE AREA PROVIDES FISH AND BIG GAME HABITAT

[Specific Idaho Roadless Area Category Change Recommendations for:] Mahogany Butte - North of Carlson Spring & South of Phantom Falls Trailhead [Sawtooth National Forest] Recommend General Forest North of Carlson Spring & South of Phantom Falls, with the exception of the Trout Creek, which is an area south of Carlson Spring and West of the Jay Creek Jeep Road that should also be moved into Backcountry Restoration; Area East of Jay Creek Jeep Road and south of Carlson Spring should be left in General Forest area; Western border recommended as Forest Road 536 and eastern border recommended at Forest Road 535 because: Trout creek contains Yellowstone cutthroat trout and good fishing; Crucial Mule Deer summer habitat and an important big game hunting area; Important big game hunting and recreation area for the communities of the Magic Valley and out-of-state hunters. (Organization, #1817.150.23100.560)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Mahogany Butte - North of Carlson Spring & South of Phantom Falls Trailhead [Sawtooth National Forest] Recommend General Forest North of Carlson Spring & South of Phantom Falls, with the exception of the Trout Creek, which is an area south of Carlson Spring and West of the Jay Creek Jeep Road that should also be moved into Backcountry Restoration; Area East of Jay Creek Jeep Road and south of Carlson Spring should be left in General Forest area; Western border recommended as Forest Road 536 and eastern border recommended at Forest Road 535 because: [This area is] Managed as “6.1-Restoration and Maintenance Emphasis within Shrubland and Grassland Landscapes” in the Sawtooth NF Plan with an emphasis on “restoring and maintaining vegetation.” Such a management category is best matched with the Backcountry Restoration category. (Organization, #1817.151.23100.160)

2-200 Public Concern: The Forest Service should reclassify the Lone Cedar Roadless Area from General Forest to Backcountry/ Restoration.

**BECAUSE THE AREA WAS PROPOSED FOR BACKCOUNTRY/RESTORATION
IN THE STATE PETITION**

[Specific Idaho Roadless Area category change recommendations for] Lone Cedar [Sawtooth National Forest]: Recommend moving General Forest to Backcountry/Restoration because was proposed for Backcountry/Restoration in the Idaho petition. (Recreation/Conservation Organization, Blackfoot, ID - #1817.152.23500.180)

**BECAUSE THE AREA PROVIDES IMPORTANT FISH AND BIG GAME HABITAT,
AND HUNTING AND RECREATION OPPORTUNITIES**

[Specific Idaho Roadless Area category change recommendations for] Lone Cedar [Sawtooth National Forest]: Recommend moving General Forest to Backcountry/Restoration because of important fishing opportunities in Trapper Creek; Mule deer crucial summer habitat and quality big game hunting. [This area is] an important big game hunting and recreation area for the communities of the Magic Valley. (Recreation/Conservation Organization, Blackfoot, ID - #1817.153.23500.560)

BECAUSE THIS ISLAND OF NON-MOTORIZED USE IS IMPORTANT FOR BIG GAME HABITAT

[Specific Idaho Roadless Area category change recommendations for] Lone Cedar [Sawtooth National Forest]: Recommend moving General Forest to Backcountry/Restoration because [this area is] an island of non-motorized use surrounded by areas of motorized vehicles making this area very important for Backcountry/Restoration and big game habitat security. (Recreation/Conservation Organization, Blackfoot, ID - #1817.154.23500.351)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area category change recommendations for] Lone Cedar [Sawtooth National Forest]: Recommend moving General Forest to Backcountry/Restoration because [it is] managed as “6.1-Restoration and Maintenance Emphasis within Shrubland and Grassland Landscapes” in the Sawtooth NF Plan with an emphasis on “restoring and maintaining vegetation.” Such a management category is best matched with the Backcountry/Restoration category. (Recreation/Conservation Organization, Blackfoot, ID - #1817.155.23500.160)

2-201 Public Concern: The Forest Service should reclassify the Italian Peaks Roadless Area from General Forest to Backcountry/ Restoration.

TO PROVIDE AN IMPORTANT BUFFER TO BLM LANDS

[Specific Idaho Roadless Area Category Change Recommendations for:] Italian Peaks [In Targhee National Forest] Recommend General Forest be moved to Backcountry Restoration because: [It is] Adjacent to Wild Land Recreation - should be Backcountry Restoration to provide important buffer to lower BLM lands. (Organization, #1817.156.23500.620)

TO LIMIT IMPACTS TO HUNTING IN MONTANA

[Specific Idaho Roadless Area Category Change Recommendations for:] Italian Peaks [In Targhee National Forest] Recommend General Forest be moved to Backcountry Restoration because: [This area is] Contiguous with Montana border. Area in Montana is recommended wilderness-new road building could affect Montana hunting. (Organization, #1817.157.23500.560)

TO PRESERVE THE NATURAL INTEGRITY OF THE AREA

[Specific Idaho Roadless Area Category Change Recommendations for:] Italian Peaks [In Targhee National Forest] Recommend General Forest be moved to Backcountry Restoration because: According to the Forest Service, “Man’s influence on the natural integrity of this area has been low” (DEIS 460). (Organization, #1817.158.23500.206)

**BECAUSE THE AREA INCLUDES ELK, MULE DEER, BIGHORN SHEEP, PRONGHORN,
AND MOUNTAIN GOAT HABITAT**

[Specific Idaho Roadless Area Category Change Recommendations for:] Italian Peaks [In Targhee National Forest] Recommend General Forest be moved to Backcountry Restoration because: Idaho Fish and Game identified elk, mule deer, bighorn sheep, pronghorn, and mountain goat habitat [here]. (Organization, #1817.159.23500.351)

BECAUSE THE AREA SUPPORTS WILD TROUT FISHERIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Italian Peaks [In Targhee National Forest] Recommend General Forest be moved to Backcountry Restoration because: [An] Important wild trout fisheries, including native cutthroat trout. (Organization, #1817.160.23500.352)

TO AVOID ADVERSE IMPACTS ON MULE DEER AND MOUNTAIN GOATS

[Specific Idaho Roadless Area Category Change Recommendations for:] Italian Peaks [In Targhee National Forest] Recommend General Forest be moved to Backcountry Restoration because: According to Idaho Fish and Game, “Increased motorized road and trail densities might reduce attractiveness of this polygon to mule deer,” and that “an increase in motorized road and trail densities would very likely negatively impact mountain goat habitat and presence” (IDFG Roadless Letter). (Organization, #1817.161.23500.331)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Italian Peaks [In Targhee National Forest] Recommend General Forest be moved to Backcountry Restoration because: [It is] Managed as “6.1-Range Management” in the Targhee National Forest Plan with a stated purpose to “maintain healthy nonforested rangelands.” This management category is best matched with the Backcountry Restoration category. (Organization, #1817.162.23500.160)

2-202 Public Concern: The Forest Service should reclassify the Bear Creek Roadless Area from General Forest to Backcountry/ Restoration.**BECAUSE THE SOUTHERN BOUNDARY IS CONTIGUOUS WITH AN AREA CLASSIFIED AS PRIMITIVE**

[Specific Idaho Roadless Area Category Change Recommendations for:] Bear Creek Recommend General Forest be moved to Backcountry Restoration because:[Its] Southern boundary contiguous with primitive; Moving to Backcountry Restoration in addition to moving Caribou City to Primitive (see Caribou below) maintains large landscape area habitat;58,8000 acres in the Targhee National Forest are currently General Forest. (Organization, #1817.163.23500.600)

**BECAUSE THE AREA PROVIDES BIG GAME HUNTING OPPORTUNITIES AND
SUPPORTS YELLOWSTONE CUTTHROAT TROUT**

[Specific Idaho Roadless Area Category Change Recommendations for:] Bear Creek Recommend General Forest be moved to Backcountry Restoration because: [Of] Large intact Roadless Area that provides important big game hunting opportunities; Important Yellowstone Cutthroat Trout Fishery. (Organization, #1817.164.23500.560)

BECAUSE THE AREA PROVIDES HABITAT FOR ELK, MULE DEER, AND MOOSE

[Specific Idaho Roadless Area Category Change Recommendations for:] Bear Creek Recommend General Forest be moved to Backcountry Restoration because: Idaho Fish and Game identified crucial Elk and Mule Deer summer range and vital moose habitat [here]. (Organization, #1817.165.23500.351)

TO PREVENT ADVERSE IMPACTS TO ELK AND YELLOWSTONE CUTTHROAT TROUT

[Specific Idaho Roadless Area Category Change Recommendations for:] Bear Creek Recommend General Forest be moved to Backcountry Restoration because: According to Idaho Fish and Game, "Increase in motorized road and trail densities would likely serve to reduce elk security aspect. Sedimentation by road/trail building and use into Yellowstone cutthroat streams might potentially harm spawning." And, "Increase in motorized road and trail densities would likely diminish the polygon's value for fawning range" (IDFG Roadless Letter). (Organization, #1817.166.23500.330)

TO PROTECT ELK, MULE DEER, AND YELLOWSTONE CUTTHROAT TROUT HABITAT

Bear Creek (Caribou/Targhee NF): Trout Unlimited recommends the 61,500 acres within this IRA [Inventoried Roadless Area] currently proposed for the General Forest, Rangeland, and Grassland (GFRG) theme be upgraded to Backcountry Restoration. This IRA protects important elk and mule deer range as well as Yellowstone Cutthroat Trout streams. In addition to high fish and wildlife values, the entire IRA is part of a larger roadless landscape when taken into context with the Caribou City roadless region on its border to the south. This entire roadless network, while not as heavily timbered as some other Roadless Areas in the Backcountry theme, is nonetheless critical to the long-term protection of trout habitat and hunting opportunity in the upper South Fork Snake River region. (Organization, #1700.10.23500.350)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Bear Creek Recommend General Forest be moved to Backcountry Restoration because: [This area is] Managed as "6.1 - Range Management" in the Targhee National Forest Plan with a stated purpose to "maintain healthy nonforested rangelands." This management category is best matched with the Backcountry Restoration category. (Organization, #1817.167.23500.160)

2-203 Public Concern: The Forest Service should reclassify the Diamond Peak Roadless Area from General Forest to Backcountry/ Restoration.

TO PROVIDE AN IMPORTANT BUFFER TO BLM LANDS

[Specific Idaho Roadless Area Category Change Recommendations for:] Diamond Peak [In Targhee National Forest] Recommend General Forest be moved to Backcountry Restoration because: [It is] Adjacent to Proposed Wilderness/Wild Land Recreation - should be Backcountry Restoration to provide important buffer to lower BLM lands. (Organization, #1817.168.23500.620)

TO AVOID ADVERSE IMPACTS TO ELK, MULE DEER, BIGHORN SHEEP, PRONGHORN, AND MOUNTAIN GOAT HABITAT

[Specific Idaho Roadless Area Category Change Recommendations for:] Diamond Peak [In Targhee National Forest] Recommend General Forest be moved to Backcountry Restoration because: Idaho Fish and Game identified elk, mule deer, bighorn sheep, pronghorn, and mountain goat habitat [here]. According to Idaho Fish and Game, "Increase in motorized road and trail densities would very likely negatively impact mountain goat habitat and presence," and "Increase in motorized road and trail densities might reduce attractiveness of this polygon to mule deer" (IDFG Roadless Letter). (Organization, #1817.169.23500.206)

BECAUSE THE AREA PROVIDES OPPORTUNITIES FOR SOLITUDE

[Specific Idaho Roadless Area Category Change Recommendations for:] Diamond Peak [In Targhee National Forest] Recommend General Forest be moved to Backcountry Restoration because: [It has] Opportunities for solitude considered "very good" by the Forest Service. (Organization, #1817.170.23500.206)

BECAUSE THE AREA IS IMPORTANT FOR WILDLIFE AND HUNTING

[Specific Idaho Roadless Area Category Change Recommendations for:] Diamond Peak [In Targhee National Forest] Recommend General Forest be moved to Backcountry Restoration because: [This area] Has a few roads, but this area is so important for wildlife and hunting that it should still be upgraded to Backcountry Restoration to maintain and “restore” those values into the future. (Organization, #1817.171.23500.201)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Diamond Peak [In Targhee National Forest] Recommend General Forest be moved to Backcountry Restoration because: [It is] Managed as “6.1-Range Management” in the Targhee National Forest Plan with a stated purpose to “maintain healthy nonforested rangelands.” This management category is best matched with the Backcountry Restoration category. (Organization, #1817.172.23500.160)

2-204 Public Concern: The Forest Service should reclassify the Garfield Mountain Roadless Area from General Forest to Backcountry/ Restoration.**BECAUSE THE AREA IS ADJACENT TO A PROPOSED WILDERNESS AREA AND TO AVOID IMPACTS ON MONTANA HUNTING**

[Specific Idaho Roadless Area Category Change Recommendations for:] Garfield Mountain Recommend General Forest be moved to Backcountry Restoration because: [This area is] Adjacent to Proposed Wilderness in the Beaverhead-Deerlodge National Forest in Montana. New road building could affect Montana hunting. (Organization, #1817.173.23500.600)

BECAUSE THE AREA PROVIDES HABITAT FOR ELK, MULE DEER, MOUNTAIN GOAT, AND MOOSE

[Specific Idaho Roadless Area Category Change Recommendations for:] Garfield Mountain Recommend General Forest be moved to Backcountry Restoration because: Idaho Fish and Game identified Elk, Mule Deer Mountain Goat, and moose range [here]. (Organization, #1817.174.23500.351)

TO AVOID ADVERSE IMPACTS TO ELK AND MULE DEER

[Specific Idaho Roadless Area Category Change Recommendations for:] Garfield Mountain Recommend General Forest be moved to Backcountry Restoration because: According to Idaho Fish and Game, “Increase in motorized road and trail densities would likely serve to reduce the attractiveness of this polygon for elk calving” and “Additional road densities, and associated disturbances not specifically designed to improve habitat for mule deer might further reduce buck:doe ratios, and allow % 4-point goals to diminish below the minimum target” (IDFG Roadless Letter). (Organization, #1817.177.23500.560)

BECAUSE THE AREA CONTAINS AN IMPORTANT WILD TROUT FISHERY

[Specific Idaho Roadless Area Category Change Recommendations for:] Garfield Mountain Recommend General Forest be moved to Backcountry Restoration because: [It is] Important wild trout fishery. (Organization, #1817.175.23500.352)

BECAUSE THE AREA PROVIDES AN IMPORTANT LINKAGE FOR WILDLIFE

[Specific Idaho Roadless Area Category Change Recommendations for:] Garfield Mountain Recommend General Forest be moved to Backcountry Restoration because: [It is an] Important wildlife linkage zone from Greater Yellowstone to Sellway-Bitterroot. (Organization, #1817.176.23500.331)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Garfield Mountain Recommend General Forest be moved to Backcountry Restoration because: [It is] Managed as “6.1-Range Management” in the Targhee National Forest Plan with a stated purpose to “maintain healthy nonforested rangelands.” This management category is best matched with the Backcountry Restoration category. (Organization, #1817.178.23500.160)

2-205 Public Concern: The Forest Service should reclassify portions of the Italian Peaks and Garfield Mountain Roadless Areas from General Forest to Backcountry/ Restoration.

TO PROTECT ROADLESS VALUES AND BIG GAME HUNTING OPPORTUNITIES

We [Hellgate Hunters and Anglers] believe the currently proposed General Forest portions of the Italian Peaks and Garfield Mountain Roadless Areas in the Caribou-Targhee should be managed under the Backcountry Restoration category to protect roadless values and big-game hunting opportunities on the Montana side of the border. Both of these Roadless Areas are shared between Idaho and Montana, and development on one side of the border could have negative consequences on big game herds and hunting in the neighboring state. These areas hold outstanding big game winter range for mountain goats, elk, and deer and hold some of the finest backcountry recreation in the nation. (Organization, #1535.5.23100.500)

2-206 Public Concern: The Forest Service should reclassify portions of the Bald Mountain Roadless Area from General Forest to Backcountry/ Restoration.

BECAUSE THE AREA IS UNROADED AND CONTIGUOUS WITH AREAS DESIGNATED AS BACKCOUNTRY/RESTORATION

[Specific Idaho Roadless Area Category Change Recommendations for:] Bald Mountain [In Targhee National Forest] Recommend 1,600 acres of General Forest be moved to Backcountry Restoration because: [This area is] Unroaded and small area contiguous with Backcountry Restoration. (Organization, #1817.179.23500.620)

TO AVOID ADVERSE IMPACTS TO ELK, MULE DEER, MOOSE, AND YELLOWSTONE CUTTHROAT TROUT

[Specific Idaho Roadless Area Category Change Recommendations for:] Bald Mountain [In Targhee National Forest] Recommend 1,600 acres of General Forest be moved to Backcountry Restoration because: Idaho Fish and Game identified crucial elk, mule deer, and moose habitat [here]. Important Yellowstone cutthroat trout fishery; According to Idaho Fish and Game, "Increase in motorized road and trail densities would likely serve to reduce the elk security aspect. Sedimentation by road/trail building and use into Yellowstone cutthroat streams might potentially harm spawning." And, "Increase in motorized road and trail densities would likely diminish the polygon's value for fawning range and possibly winter range" (IDFG Roadless Letter). (Organization, #1817.180.23500.330)

BECAUSE RECLASSIFICATION IS CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Bald Mountain [In Targhee National Forest] Recommend 1,600 acres of General Forest be moved to Backcountry Restoration because: [It is] Managed as "6.1-Range Management" in the Targhee National Forest Plan with a stated purpose to "maintain healthy nonforested rangelands." This management category is best matched with the Backcountry Restoration category. (Organization, #1817.181.23500.160)

General Forest to Primitive

2-207 Public Concern: The Forest Service should reclassify the southeastern portion of Spring Creek Inventoried Roadless Area from General Forest to Primitive.

BECAUSE THE AREA IS ADJACENT TO AN INVENTORIED ROADLESS AREA CATEGORIZED AS PRIMITIVE

[Specific Idaho Roadless Area Category Change Recommendations for:] Gannett-Spring [In Caribou National Forest] Recommend moving southeastern portion of Spring Creek IRA [Inventoried Roadless Area] currently in General Forest to Primitive in Idaho rule because: [it is] Adjacent to Primitive category IRA to the north. (Organization, #1817.64.23400.620)

BECAUSE THE AREA INCLUDES ELK AND MULE DEER SUMMER RANGE HABITAT

[Specific Idaho Roadless Area Category Change Recommendations for:] Gannett-Spring [In Caribou National Forest] Recommend moving southeastern portion of Spring Creek IRA [Inventoried Roadless Area] currently in General Forest to Primitive in Idaho rule because: Idaho Fish and Game identified crucial elk and mule deer summer range here. (Organization, #1817.65.23400.351)

BECAUSE ACCESS SHOULD BE LIMITED TO NON-MOTORIZED USES

[Specific Idaho Roadless Area Category Change Recommendations for:] Gannett-Spring [In Caribou National Forest] Recommend moving southeastern portion of Spring Creek IRA [Inventoried Roadless Area] currently in General Forest to Primitive in Idaho rule because: [it is] Non motorized use only - very high backcountry values. (Organization, #1817.63.23400.206)

BECAUSE RECLASSIFICATION IS MOST CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Gannett-Spring [In Caribou National Forest] Recommend moving southeastern portion of Spring Creek IRA [Inventoried Roadless Area] currently in General Forest to Primitive in Idaho rule because: [it is] Managed as “6.2 - Rangeland Vegetative Management” in the Caribou NF Plan with a primary goal to “Maintain and restore ecological processes and functions.” Such a management category is best matched with the Backcountry Restoration category. (Organization, #1817.66.23400.160)

2-208 Public Concern: The Forest Service should reclassify the Red Mountain Roadless Area from General Forest to Primitive.**BECAUSE OF THE HIGH-QUALITY BACKCOUNTRY VALUES**

[Specific Idaho Roadless Area Category Change Recommendations for:] Red Mountain [In Caribou National Forest] Recommend moving General Forest portion to Primitive in Idaho rule because: [Its is] Non- motorized use only [providing] very high backcountry values; Naturalness of the environment is considered “very high” by the forest service; General forest part of Red Mountain surrounds Primitive center of the Roadless Area, but all of the area has high-quality backcountry values. (Organization, #1817.43.23400.206)

BECAUSE THE AREA CONTAINS BONNEVILLE CUTTHROAT TROUT

[Specific Idaho Roadless Area Category Change Recommendations for:] Red Mountain [In Caribou National Forest] Recommend moving General Forest portion to Primitive in Idaho rule because: [It] contains Bonneville Cutthroat Trout. (Organization, #1817.44.23400.352)

BECAUSE THE AREA INCLUDES ELK AND MULE DEER SUMMER RANGE HABITAT

[Specific Idaho Roadless Area Category Change Recommendations for:] Red Mountain [In Caribou National Forest] Recommend moving General Forest portion to Primitive in Idaho rule because: Idaho Fish and Game identified crucial elk and mule deer summer range. (Organization, #1817.45.23400.352)

BECAUSE THIS IS MOST CONSISTENT WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Red Mountain [In Caribou National Forest] Recommend moving General Forest portion to Primitive in Idaho rule because: Managed as “6.2 - Rangeland Vegetative Management” in the Caribou NF Plan with a primary goal to “Maintain and restore ecological processes and functions.” Such a management category is best matched with the Backcountry Restoration category. (Organization, #1817.46.23400.160)

2-209 Public Concern: The Forest Service should reclassify the Pioneer Mountains from General Forest to Primitive.**TO PROTECT THE PRIMITIVE CHARACTER OF THESE AREAS AND PROHIBIT ROAD BUILDING**

I believe that the Roadless areas in the Pioneer Mountains should be protected under the same restrictions as the 2001 Roadless Rule that prevent any road building and maintain the primitive character of these areas. I recommend against identifying portions of the Pioneers as “General Forest,”

but rather ask you to identify all of the Pioneer Mountains on the Sawtooth and Salmon-Challis National Forest as Primitive or to maintain the existing 2001 status. In addition, I recommend that the areas in the eastern Pioneers which have been labeled as “Backcountry/Restoration” also be elevated to a higher level of protection with no exceptions that could allow road building. (Individual, Ketchum, ID - #6785.4.23100.200)

2-210 Public Concern: The Forest Service should reclassify Porcupine Creek, Upper Muldoon Creek, and Copper Creek from General Forest to Primitive.

TO MAINTAIN THE CURRENT STATUS

We recommend against identifying the area in Porcupine Creek, Upper Muldoon Creek, and Copper Creek as “General Forest,” but rather we ask you to identify them as Primitive or to maintain the existing 2001 status.... (Organization, #1492.4.23100.200)

2-211 Public Concern: The Forest Service should reclassify the Katka Peak from General Forest to Primitive.

TO PROTECT THEM FROM TIMBER HARVEST AND PRESERVE THE SCENIC INTEGRITY

In the 1990’s I attended a Forest Service meeting concerning management of the Katka, Clifty, Black Mountains ridge. So many of us who live in Paradise Valley and other areas commented on the importance of the beauty of these forested mountains that a decision was made to manage without timber harvest. Now it appears that the area below Katka Peak is slated for “General Forest,” which no doubt includes timber harvest and “moderate reductions in scenic integrity.” That would be a mistake and would result in a daily reminder for many of us that the Forest Service cannot be trusted with the concerns of residents, but caters to the loud voice of business. Every day I am grateful for the wooded slopes above my home, above the clear cuts and roads on private land. And it is not lost on me that this view affects the value of my property and the property of all my neighbors. Please change the General Forest area on Katka to Primitive and leave the forested slopes the way they are, even though Nature will change them. Everyone knows that sooner or later there will be a forest fire. It’s the nature of forest to burn, one way or another, but at least there would not be roads and ugly cutting areas. (Individual, #1563.1.23100.61)

2-212 Public Concern: The Forest Service should reclassify portions of the Toponce Roadless Area from General Forest to Primitive.

BECAUSE IT IS AN IMPORTANT RECREATION CENTER

Specific Id Roadless Area Category Change Recommendations for: Caribou National Forest: Toponce Recommend moving General forest portion to Primitive in Idaho rule [because]; Important and popular recreation center for the cities of Pocatello, Inkom, McCammon, & Lava. (Organization, #1817.24.23400.500)

BECAUSE THE AREA HAS HIGH BACKCOUNTRY VALUES AND IS CONTIGUOUS WITH OTHER BACKCOUNTRY LANDS

Specific Id Roadless Area Category Change Recommendations for: Caribou National Forest: Toponce Recommend moving General forest portion to Primitive in Idaho rule [because]; Almost entirely non-motorized use only - very high backcountry values; Naturalness considered “high” by the Forest Service. Northern boundary contiguous with wild backcountry lands in the Shoshone Bannock Reservation. (Organization, #1817.25.23400.206)

TO PRESERVE BIG GAME HUNTING OPPORTUNITIES

Specific Id Roadless Area Category Change Recommendations for: Caribou National Forest: Toponce Recommend moving General forest portion to Primitive in Idaho rule [because]; According to ID Fish and Game, “With the creation of new roads, big game security areas would decrease in size. This may result in the IDFG reducing hunter numbers to meet big game management objectives” (IDFG Caribou NF Roadless Summary). (Organization, #1817.26.23400.560)

BECAUSE MOST OF THIS ROADLESS AREA IS ALREADY DESIGNATED AS PRIMITIVE

Specific Id Roadless Area Category Change Recommendations for: Caribou National Forest: Toponce Recommend moving General forest portion to Primitive in Idaho rule [because]; Much of Toponce is currently proposed for Primitive in the DEIS. (Organization, #1817.27.23400.160)

**BECAUSE THE AREA PROVIDES CRUCIAL SUMMER RANGE
HABITAT FOR ELK, MOOSE, AND MULE DEER**

Specific Id Roadless Area Category Change Recommendations for: Caribou National Forest: Toponce Recommend moving General forest portion to Primitive in Idaho rule [because]; Idaho Fish and Game identified crucial elk, moose, and mule deer Summer Range. (Organization, #1817.28.23400.351)

TO PROVIDE CONSISTENCY WITH THE FOREST PLAN

Specific Id Roadless Area Category Change Recommendations for: Caribou National Forest: Toponce Recommend moving General forest portion to Primitive in Idaho rule [because]; Managed as “6.2 - Rangeland Vegetative Management” in the Caribou NF Plan with a primary goal to “Maintain and restore ecological processes and functions.” Such a management category is best matched with the Backcountry Restoration category. (Organization, #1817.29.23400.160)

**2-213 Public Concern: The Forest Service should reclassify portions of the
Caribou City Roadless Area from General Forest to Primitive.****BECAUSE THE AREA PROVIDES SOLITUDE**

[Specific Idaho Roadless Area Category Change Recommendations for:] Caribou City [In Caribou National Forest] Recommend moving General forest portion to Primitive in Idaho rule because; Remoteness and solitude are rated as high by the Forest Service; (Organization, #1817.30.23400.206)

**BECAUSE THE AREA IS ADJACENT TO RECOMMENDED WILDERNESS AREAS
AND TO HISTORIC MINING AREAS**

[Specific Idaho Roadless Area Category Change Recommendations for:] Caribou City [In Caribou National Forest] Recommend moving General forest portion to Primitive in Idaho rule because; Adjacent to recommended wilderness and to the historic mining areas that are in the special area directly to the north. (Organization, #1817.31.23400.600)

TO MAINTAIN LARGE LANDSCAPE AREA HABITAT

[Specific Idaho Roadless Area Category Change Recommendations for:] Caribou City [In Caribou National Forest] Recommend moving General forest portion to Primitive in Idaho rule because; Moving [this area] to Primitive along with moving Bear Creek to Backcountry Restoration maintains large landscape area habitat. (Organization, #1817.32.23400.331)

TO PROVIDE A BUFFER BETWEEN RECOMMENDED WILDERNESS AREAS AND NON-ROADLESS FOREST

[Specific Idaho Roadless Area Category Change Recommendations for:] Caribou City [In Caribou National Forest] Recommend moving General forest portion to Primitive in Idaho rule because; Upgrading [this area] provides a buffer between recommended wilderness and surrounding non-roadless forest and Backcountry Restoration areas. (Organization, #1817.33.23400.620)

TO PRESERVE DEER, ELK, AND MOOSE HUNTING OPPORTUNITIES

[Specific Idaho Roadless Area Category Change Recommendations for:] Caribou City [In Caribou National Forest] Recommend moving General forest portion to Primitive in Idaho rule because; [of] Excellent deer, elk and moose hunting. (Organization, #1817.34.23400.560)

BECAUSE IT IS A NON-MOTORIZED USE ONLY AREA WITH HIGH BACKCOUNTRY VALUES

[Specific Idaho Roadless Area Category Change Recommendations for:] Caribou City [In Caribou National Forest] Recommend moving General forest portion to Primitive in Idaho rule because; [It is] Non-motorized use only [providing] very high backcountry values. (Organization, #1817.35.23400.206)

BECAUSE THE AREA PROVIDES SUMMER RANGE HABITAT FOR ELK AND MULE DEER

[Specific Idaho Roadless Area Category Change Recommendations for:] Caribou City [In Caribou National Forest] Recommend moving General forest portion to Primitive in Idaho rule because; Idaho Fish and Game identified crucial elk and mule deer summer range [here]. (Organization, #1817.36.23400.331)

TO PROVIDE CONSISTENCY WITH THE FOREST PLAN

[Specific Idaho Roadless Area Category Change Recommendations for:] Caribou City [In Caribou National Forest] Recommend moving General forest portion to Primitive in Idaho rule because; [It is] Managed as “6.2 - Rangeland Vegetative Management” in the Caribou NF Plan with a primary goal to “Maintain and restore ecological processes and functions.” Such a management category is best matched with the Backcountry Restoration category. (Organization, #1817.37.23400.160)

Backcountry/Restoration to Primitive

2-214 Public Concern: The Forest Service should reclassify the Backcountry/Restoration areas in the Palisades Roadless Area as Primitive.

TO BENEFIT YELLOWSTONE CUTTHROAT TROUT

Palisades (257,000 acres total in two states and two NF: Targhee National Forest and contiguous to the Bridger-Teton National Forest Palisades IRA [Inventoried Roadless Area]): Trout Unlimited recommends moving the 53,100 acres proposed in this IRA for Idaho’s Backcountry Restoration theme into the Primitive theme. This area contains the upper reaches of both Rainey and Palisades Creeks. Both of these streams are South Fork Snake River spawning strongholds for Yellowstone Cutthroat Trout. The lower portions of both creeks cross private land where Trout Unlimited has done extensive stream restoration work with private landowners and has plans to do more future work. Keeping the headwaters of these streams pristine and intact as well as the trout populations healthy will critical to that future work which benefits both private and public resources. All [other than those Wildland Recreation] areas should be included under the Primitive theme, unless they no longer meet roadless criteria. (Individual, #1809.4.23500.206)

2-215 Public Concern: The Forest Service should reclassify the Roman Nose area from Backcountry/Restoration to Primitive.

The ridge from Roman Nose to Cook’s Lake is very fine, but not so isolated from roads as the ridge on the west side of Pack River, so Primitive may be an appropriate designation there. I do not think that Backcountry Restoration is appropriate for the Roman Nose area. (Individual, #1563.7.23100.680)

2-216 Public Concern: The Forest Service should reclassify the Rawhide Roadless Area from Backcountry/Restoration to Primitive.

BECAUSE OF ITS PROXIMITY TO PROPOSED WILDERNESS

Rawhide: We [Great Burn Study Group] recommend upgrading the proposed designation of Backcountry/Restoration to Primitive due to its proximity to the proposed Great Burn Wilderness. (Place-Based Group, Missoula, MT - #1712.10.23400.650)

2-217 Public Concern: The Forest Service should reclassify the Meadow Creek-Upper North Fork Roadless Area from Backcountry/Restoration to Primitive.

BECAUSE OF ITS PROXIMITY TO PROPOSED WILDERNESS

Meadow Creek-Upper North Fork: We [Great Burn Study Group] recommend upgrading the proposed designation of Backcountry/Restoration to Primitive due to its proximity to the proposed Great Burn

wilderness. In addition, the Forest Plans for the area allocate some acreage to Primitive and Wild Land Recreation. (Place-Based Group, Missoula, MT - #1712.9.23400.600)

2-218 Public Concern: The Forest Service should reclassify the Moose Mountain Roadless Area from Backcountry/Restoration to Primitive.

TO BE CONSISTENT WITH THE FOREST PLAN

Moose Mountain: We [Great Burn Study Group] recommend upgrading the proposed designation of Backcountry/Restoration to Primitive to maintain consistency with the Clearwater Forest Plan. (Place-Based Group, Missoula, MT - #1712.7.23400.160)

2-219 Public Concern: The Forest Service should reclassify the Pot Mountain Roadless Area from Backcountry/Restoration to Primitive.

BECAUSE THE AREA HAS HIGHLY EROSIIVE SOILS AND STEEP TERRAIN

Pot Mountain: We [Great Burn Study Group] recommend upgrading the proposed designation of Backcountry/Restoration to Primitive. This area has highly erosive soils and steep terrain. In addition, its location is not adjacent to communities. (Place-Based Group, Missoula, MT - #1712.8.23400.002)

2-220 Public Concern: The Forest Service should reclassify the Mallard-Larkins Roadless Area from Backcountry/Restoration to Primitive.

TO BE CONSISTENT WITH FOREST PLANS

Mallard Larkins: We [Great Burn Study Group] fully support the proposed Wild Land Recreation designation for this area. We recommend upgrading the Backcountry/Restoration acres to Primitive to maintain consistency with the Forest Plans for this area. (Place-Based Group, Missoula, MT - #1712.5.23100.160)

2-221 Public Concern: The Forest Service should reclassify the portions of the Palisades Roadless Area from Backcountry/Restoration to Primitive.

BECAUSE THE AREA IS CONTIGUOUS WITH WILD LANDS RECREATION AND WILDERNESS AREAS

[Specific Idaho Roadless Area Category Change Recommendations for:] Palisades recommended transfer Backcountry/Restoration portion into Primitive Area because: [It is] Contiguous with Wild Lands Recreation in Idaho plan and recommended wilderness in the Forest Plan - transfer in to Primitive provides important management buffer for Wild Land area. (Organization, #1817.182.23400.620)

BECAUSE THE AREA SUPPORTS MULE DEER, ELK, MOOSE, AND BIG GAME HUNTING

[Specific Idaho Roadless Area Category Change Recommendations for:] Palisades Recommended transfer Backcountry Restoration portion into Primitive Area because: [It contains] Vital mule deer, elk, and moose habitat and big game hunting. (Organization, #1817.183.23400.351)

BECAUSE THE AREA SUPPORTS YELLOWSTONE CUTTHROAT TROUT

[Specific Idaho Roadless Area Category Change Recommendations for:] Palisades Recommended transfer Backcountry Restoration portion into Primitive Area because: [This one contains] Yellowstone Cutthroat Trout Fisheries. (Organization, #1817.184.23400.352)

BECAUSE THE AREA PROVIDES SOLITUDE

[Specific Idaho Roadless Area Category Change Recommendations for:] Palisades Recommended transfer Backcountry Restoration portion into Primitive Area because: According to Forest Service, provides "high potential for solitude." (Organization, #1817.185.23400.20)

2-222 Public Concern: The Forest Service should reclassify the Selkirk Crest from Backcountry/Restoration to Primitive or Wild Land Recreation.

TO PROVIDE THE PROTECTION THESE AREAS DESERVE

My suggestions to strengthen the new rules for the northern panhandle: The Selkirk Crest is a gem. I am disappointed that all the contiguous Roadless Areas are not included as either Primitive or Wild Land Recreation. This area is painfully narrow and should be widened wherever possible. Backcountry/Restoration doesn't offer the protection that these contiguous Roadless Areas deserve. (Individual, #1939.9.20000.600)

Backcountry/Restoration to General Forest

2-223 Public Concern: The Forest Service should reclassify portions of the Mount Jefferson Roadless Areas from Backcountry/Restoration to General Forest.

TO ALLOW FOR ACTIVE MANAGEMENT, INCLUDING PROACTIVE TIMBER FOREST

We [Clark County Board of Commissioners] ask [for a change] in the Mt. Jefferson Roadless Area. This is management prescription 5.1.4b, which the Idaho Rule classified as Backcountry/Restoration. Prescription 5.1.4b is a timber management prescription with a big game security emphasis. To manage this area to provide the mosaic of vegetation species and age classes to meet wildlife security needs, the Forest must actively manage the forest vegetation, including use of timber harvest on a sustained yield basis. But the Backcountry/Restoration category does not allow proactive timber harvest. Timber harvest is allowed here only to maintain or restore characteristics of ecosystem composition and structure; to reduce significant risk of wildland fire effects; or when the cutting, sale, or removal of timber is within an already substantially altered portion of a Roadless Area. Environmental groups will likely argue that a regular program of harvest to emphasize big game security does not meet the intent of the Backcountry/Restoration category and would therefore appeal and litigate to stop timber harvest in this Roadless Area. To prevent this we ask that you change the Backcountry/Restoration category to General Forest, which does allow timber harvest on a regulated sustainable basis. (Government, #1576.5.23600.261)

Backcountry/Restoration to Wild Land Recreation

2-224 Public Concern: The Forest Service should reclassify the Roadless Areas contiguous to the Long Canyon Roadless Area from Backcountry/Restoration to Wild Land Recreation

My suggestions to strengthen the new rules for the northern panhandle: The Long Canyon Portion of this is Roadless Area is correctly designated as Wild Land Recreation, however all contiguous roadless lands should also be Wild Land Recreation rather than the proposed Backcountry/Restoration. (Individual, #1939.10.20000.600)

2-225 Public Concern: The Forest Service should reclassify the area adjacent to the Selkirk and Salmon/Priest Roadless Areas and the Katka Peak, Roberts and Mount Willard-Lake Estelle areas from Backcountry/Restoration to Wild Land Recreation.

TO PRESERVE THE WILDERNESS EXPERIENCE BY REDUCING THE IMPACTS FROM ROADS

I also object to the Back Country/Restoration category assigned to most of IPNF's [Idaho Panhandle National Forest's] Roadless Areas. Specifically, the BCR [Backcountry/Restoration] adjacent to the Selkirk and Salmon/Priest Roadless [Areas] which are designated Wildland Recreation. These areas, too, should be in the Wildland Recreation category. In addition, I'd like to see Katka Peak, Roberts, Mt. [Mount] Willard-Lake Estelle BCRs [Backcountry/Restoration] as Wildland Recreation. Wilderness experience is enhanced by large tracts of unroaded lands. It seems any significant risk-whether it be

fuels, insects, disease, windstorms, or fire-can serve as a reason to punch in a new “temporary road.” Given the length of contracts and if funding is even available for obliteration, these “temporary” roads will likely be there ten years or more. Meanwhile, use by humans/ORVs [off-road vehicles], animals, and noxious weed introductions are likely. Endangered species will be impacted. (Individual, Naples, ID - #6548.6.23200.680)

Primitive to Wild Land Recreation

2-226 Public Concern: The Forest Service should reclassify portions of the Rapid River Roadless Area from Primitive to Wild Land Recreation.

TO ALLOW THE WATERSHED TO BE MANAGED AS A COMPLETE SYSTEM

Rapid River (Payette National Forest): TU [Trout Unlimited] recommends moving 68,400 acres of this 78,700 acre Roadless Area from the Primitive Theme to the Wildlands Recreation Theme. The remaining 10,300 acres will stay within the Forest Plan Special Areas category (8400 in w and s [Wild and Scenic] and 1900 acres in a research natural area). This IRA [Inventoried Roadless Area] is bordered on its entire west boundary by the Hells Canyon Wilderness within the HCNRA [Hells Canyon NRA]. The watershed is an integral piece of the Hells Canyon ecosystem and was identified by the Nez Perce for its special historical, Tribal and wilderness values. The entire Rapid River watershed management jurisdiction has been divided between three National Forests (Nez Perce, Payette, Wallowa-Whitman) and has never had the opportunity to be managed as a complete system. (Organization, #1700.4.23100.2)

BECAUSE THE AREA PROVIDES IMPORTANT FISH HABITAT

Rapid River (Payette National Forest): TU [Trout Unlimited] recommends moving 68,400 acres of this 78,700 acre Roadless Area from the Primitive Theme to the Wildlands Recreation Theme. The remaining 10,300 acres will stay within the Forest Plan Special Areas category (8400 in w and s [Wild and Scenic] and 1900 acres in a research natural area). It is among the most pristine fish and wildlife and scenic IRAs left in the state. It's classified as the largest, best remaining aquatic bull trout stronghold within the Little Salmon River watershed and a key spawning and rearing stream for the survival of two other threatened fish species - steelhead and summer Chinook salmon. In addition to bull trout, steelhead and Chinook, the entire Rapid River system is home to a healthy native rainbow trout population. It also provides the critical water supply for the federal salmon hatchery located two miles upstream from its confluence with the Little Salmon River. The return of these fish to this hatchery supplies a key component to the local economy. (Organization, #1700.5.23100.352)

BECAUSE THE AREA PROVIDES HIGH-QUALITY HUNTING OPPORTUNITIES

Rapid River (Payette National Forest): TU [Trout Unlimited] recommends moving 68,400 acres of this 78,700 acre Roadless Area from the Primitive Theme to the Wildlands Recreation Theme. The remaining 10,300 acres will stay within the Forest Plan Special Areas category (8400 in w and s [Wild and Scenic] and 1900 acres in a research natural area). This landscape is a critical component to the long general hunting seasons and liberal big game tags in Big Game Hunt Units 22 and 23. Part of Hunt Unit 18 is also located within the IRA [Inventoried Roadless Area] and is managed under controlled regulations for trophy class hunting opportunities. (Organization, #1700.7.23100.560)

2-227 Public Concern: The Forest Service should reclassify portions of the Hells Canyon/Seven Devils Roadless Areas from Primitive to Wild Land Recreation.

BECAUSE THE AREA PROVIDES IMPORTANT FISH AND WILDLIFE HABITAT

Hells Canyon/Seven Devils Scenic IRA [Inventoried Roadless Area] (Payette National Forest): Trout Unlimited recommends moving 29,000 acres of this 29,700 acres area from the Primitive Theme to the Wildlands Recreation theme. This IRA is located to the southwest of the Rapid River. Only the primitive Black Lake road separates the two IRAs. The Seven Devils IRA is part of the greater Hells Canyon ecosystem and borders the Hells Canyon Wilderness on its south and east side. As with the Rapid River IRA its wild, remote and rugged character offers excellent opportunities for wildland hunters and anglers

as well as irreplaceable winter big game habitat and migratory components to the entire upper Hells Canyon system. Threatened steelhead and summer Chinook occur in Deep Creek, which empties into the Snake River immediately below the Hells Canyon dam and is the highest existing upstream anadromous tributary to the Snake River. (Organization, #1700.8.23200.2)

2-228 Public Concern: The Forest Service should reclassify the area from Hunt Peak to Harrison Peak from Primitive to Wild Land Recreation.

BECAUSE THE REST OF THE SELKIRK CREST IS DESIGNATED AS WILD LAND RECREATION

The area from Hunt Peak (actually McCormick Lake is further south) to Harrison Peak is just as magnificent and wild as the portions of the Crest north of Harrison Peak. It is odd that this is the only Roadless Areas in the Panhandle National Forest that is designated Primitive. It should be managed as Wild Land Recreation contiguous with the rest of the Selkirk Crest. There is not natural division in the landscape; it makes no sense to impose one. (Individual, #1563.6.23100.200)

2-229 Public Concern: The Forest Service should reclassify the Rapid River Roadless Area from Primitive to Wild Land Recreation.

BECAUSE THE AREA IS DE FACTO WILDERNESS AND SHOULD BE PROTECTED AS SUCH

Rapid River Roadless Area:

All 77,000 acres of this Roadless Area should be considered as a Wildland Recreation area. It seems beyond question that it is de facto Wilderness right now with thousands of people hiking in the Rapid River area, the hatchery at the lower stretch outside of the IRA, and diverse trees such as yew trees, wildlife (including bighorn sheep), and the stunning beauty of the canyon, the crystalline water of the creek. That rapid river was the tradeoff with Oregon for Brownlee Reservoir's salmon makes it the sort of deal that should be reconsidered. The Primitive prescription underestimates that the public opinion is that this Roadless Area should be Wilderness. Please change the prescription to Wildland Recreation. (Preservation/Conservation, #1480.15.62000.2)

Primitive to Backcountry/Restoration

2-230 Public Concern: The Forest Service should reclassify the Garfield Roadless Area from Primitive to Backcountry/Restoration.

TO ALLOW MOTORIZED RECREATION ON DESIGNATED ROUTES

There are changes we [Clark County Board of Commissioners] would like to see in the proposed Rule. One change involves the Primitive category in the Garfield Roadless Area. It is land near the head of Medicine Lodge Creek and north of the F[orest] S[ervice] Road 280. It is primarily open sagebrush land with some timber on north-facing slopes. It is well suited to motorized use on designated routes, both for management of grazing allotments and for motorized recreation. The Targhee Forest Plan put this area in a nonmotorized 3.1.1 management prescription which, as the name implies, does not allow motorized use. Nor does the Primitive category in the Idaho Roadless Rule. We ask that this 3.1.1 prescription be changed to prescription 3.2g, and the Idaho Rule changed to a Backcountry/Restoration category, so motorized use on designated routes and trails can occur. Making this change will recognize the strong interests of our constituents in Clark [County] who were cut off from their use of this area by Targhee forest officials. (Government, #1576.3.23500.530)

2-231 Public Concern: The Forest Service should reclassify portions of the Mt. Jefferson Roadless Area from Primitive to Backcountry/Restoration.

TO ALLOW FOR TREE SALVAGE AND REMOVAL

We [Clark County Board of Commissioners] ask [for a change] in the Mt. Jefferson Roadless Area. This change involves prescription 3.1.1, which the Idaho Roadless Rule classified as Primitive. In the past five years we have seen a significant increase in Douglas-fir bark beetle activity in the Centennial

Mountains. As a result, thousands of trees have died and now provide an increased fuel loading that is susceptible to large catastrophic wildfires. The current management prescription (3.1.1) does not allow these trees to be salvaged and removed. Nor does the Primitive category imposed by Idaho Rule allow for salvage of dead trees. So there is no way to treat the increasing fuel loading here. To fix the problems, we ask that the 3.1.1 prescription in Mt. Jefferson be modified to allow the salvage of dead and dying insect- and fire-killed trees, or even better, the category be changed to Backcountry/Restoration, which would allow trees to be cut and removed to improve forest health. (Government, #1576.4.23500.260)

Wilderness Designations

2-232 Public Concern: The Forest Service should continue to recommend Wilderness Areas already identified.

BECAUSE THE STATE OF IDAHO WILL NOT DO SO

Even more concerning is the position of the state that it is deceiving to “recommend Wilderness” because only Congress can designate Wilderness. The Forest Service cannot designate Wilderness either, but has been recommending Wilderness to Congress since RARE I based on the input of local citizenry and their involvement in the Forest Planning process. The State’s logic here is flawed and results in a great disservice to the citizens of Idaho who wish to see certain Roadless areas permanently protected as Wilderness by the Congress. (Individual, #1703.5.10440.30.)

TO AVOID “AN IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES”

If those recommendations [previous Wilderness recommendations] are removed by this petition and rule, the Forest Service and the state will have committed an “irreversible and irretrievable commitment of resources” as cited in California v. Block. Congress heavily considers such recommendations with regard to proposed wilderness designations. If such recommendations are absent, Congress will be less likely to consider proposed Wilderness legislation for areas no longer recommended for Wilderness designation to this body. (Individual, #1703.6.20000.650.)

The rule makes an “irreversible and irretrievable commitment of resources” by opening up Roadless areas to development and repealing recommendations made to Congress for Wilderness designation of certain Roadless areas. Has the Forest Service not learned its lesson from California v. Block? (Individual, #1703.32.20000.100.)

2-233 Public Concern: The Forest Service should ensure that Roadless Areas do not become de facto Wilderness Areas.

BECAUSE RECREATIONAL USES OCCUR ON MANY ROADLESS AREAS THAT ARE INCONSISTENT WITH WILDERNESS DESIGNATION

A Final Rule Must Better Protect Against “De Facto Wilderness” Management of Roadless Areas.

We would like to take this opportunity to point out what BRC [Blue Ribbon Coalition] views as a fundamental problem with managing Inventoried Roadless Areas as a “stand alone” management designation.

Prior to the 2001 Roadless Rule, Inventoried Roadless Areas were just that: an inventory. It was the “first cut,” so to speak, in the Agency’s mandated Wilderness inventory and review process. The statutory authority to create a “Roadless Area” management classification did not exist until 2001 [Footnote 4: The BlueRibbon Coalition remains active in all of the pending Roadless litigation, and notes that the legitimacy of the 2001 Roadless Rule remains an open question given the pendency of appeals before the Ninth Circuit Court of Appeals and petitions for review before the U.S. District of Wyoming court]. This rule will formally establish the “Roadless Area” management classification for the state of Idaho.

The point we wish to make is that it may be difficult for the Agency or the State of Idaho to separate “Roadless Areas” from Wilderness. It is imperative to understand that the U.S. Forest Service has created “Roadless Areas” that include much in the way of recreational uses that are not consistent with Wilderness designation. This is perhaps because the Agency’s criteria for establishing an Inventoried Roadless Area is primarily concerned with the existence of developed and maintained roads. The existence of other, “non-conforming” uses that are not compatible with Wilderness designation is to be analyzed after the “first cut.” Thus we have Roadless areas (first cut) and Recommended Wilderness Areas (final recommendation). (Motorized Recreation, #1801.13.62200.500)

2-234 Public Concern: The Forest Service should not create more Wilderness or de facto Wilderness Areas.

TO ENSURE CONTINUED MOTORIZED ACCESS

The Forest Service and BLM do not have the authority to create de-facto Wilderness. It is critical that the Agency differentiate between the powers of rule promulgating and enforcement agencies (like the BLM and Forest Service) and our Federal rulemaking body (Congress). Rulemaking agencies cannot create areas that are Wilderness in all but name. Wilderness study areas and non-motorized areas are managed as Wilderness areas and are simply a mechanism to evade the measures set forth in the Wilderness Act. If these lands are important wilderness-type lands, then the Agency must follow the laws set forth in the Wilderness Act (Public Law 88-577 - 16 U.S. C. 1131-1136) including: Presidential recommendation to Congress. The President shall advise the United States Senate and House of Representatives of his recommendations with respect to the designation as “Wilderness” or other reclassification of each area on which review has been completed, together with maps and a definition of boundaries...

Congressional approval. Each recommendation of the President for designation as “Wilderness” shall become effective only if so provided by an Act of Congress. There simply is no justification for creating more Wilderness or de-facto Wilderness areas in our forests. If forest management continues to allow anti-access groups to use the travel planning process to further their agendas the travel plan will certainly fail! It should not be the purpose or intent of the planning process to exclude OHV travel or to crowd these users into small areas. To do so will produce unacceptable impacts on the forest and ultimately result in inappropriate use brought on by the travel plan itself. Additionally the decision must consider that non-motorized recreationists have the opportunity to go not only to designated Wilderness areas but anywhere while the opportunities for motorized recreationists are limited to designated routes in a small portion of multiple-use areas. (Motorized Recreation, Helena, MT - #168.34.22100.650)

2-235 Public Concern: The Forest Service should consider including the National Recreation designation in the proposed Rule.

BECAUSE IT WOULD BE LESS COSTLY THAN THE WILDERNESS DESIGNATION

Roadless designation is merely a backdoor approach to more Wilderness designation. We should be considering less Wilderness, it is a very costly management designation. National Recreation designation is much more practical. The U.S.F.S. already has 50 Million acres of Wilderness and probably another 50 million tied up in various no use designations, adding another 60 million leaves only 30 plus million acres the U.S.F.S. can manage for the original Organic Act goals and the average American. (Individual, #6.1.62200.800.)

2-236 Public Concern: The Forest Service should add the Salmo-Priest Roadless Area and Hughes Ridge to the Salmo Wilderness Area.

My suggestions to strengthen the new rules for the northern panhandle: The Salmo-Priest Roadless Area qualifies as Wild Land Recreation however should be added as a logical addition to the Salmo Wilderness as was intended. Hughes Ridge, (located between Hughes Meadows and the Upper Priest roadless and Wild and Scenic River Segment) with its narrow finger of roads and logged over areas should be included in this wilderness proposal and continued to return to its natural state as it has been for some 20 years. (Individual, #1939.5.20000.650)

2-237 Public Concern: The Forest Service should add the Thunder Mountain Roadless Area to the Wilderness.

My suggestions to strengthen the new rules for the northern panhandle: The Thunder Mountain Roadless area including Jackson Creek, Bench Creek, Hughes Fork and Hughes Meadows should logically be included in the Wilderness. At the least this area should remain as Wild Land Recreation as proposed in the roadless rule. (Individual, #1939.6.20000.650)

2-238 Public Concern: The Forest Service should recommend the Hoodoo, Rawhide, Meadow Creek Upper North Fork, North Fork Spruce, White Sand, Sneakfoot Meadows, and Lochsa Roadless Areas for Wilderness designation.

It's unclear why parts of the Hoodoo Roadless area need to be included in the "general forest" category. This is not WUI. This Roadless area is far from any private lands, structures or residences. All portions of the Hoodoo, Rawhide, and Meadow Creek-Upper North Fork display high Wilderness attribute ratings and should be recommended for Wilderness designation to Congress. The North Fork Spruce-White Sand, Sneakfoot Meadows, and Lochsa Roadless areas should be recommended to Congress for Wilderness designation. (Individual, #1703.12.23600.650)

2-239 Public Concern: The Forest Service should recommend the Rapid River Roadless Area for Wilderness designation.

TO PROTECT WATER QUALITY AND ANADROMOUS FISHERIES

Payette National Forest:

Both the Nez Perce National Forest and Payette National Forest portions of the Rapid River IRA [Inventoried Roadless Area] should be recommended to Congress for Wilderness designation. This would also help to protect the outstandingly remarkable water quality and anadromous fisheries in the Rapid River watershed as required by the enabling legislation for the Hells Canyon National Recreation Area. (Individual, #1703.18.62200.240)

2-240 Public Concern: The Forest Service should not reduce the size of the areas recommended in the Hanson Lakes, Boulder-White Clouds, and Pioneer Mountains Roadless Areas for Wilderness designation.

BECAUSE REDUCTION IN THE PROPOSED WILDERNESS AREA WAS NOT ANALYZED IN THE DEIS

Sawtooth National Forest:

The Hanson Lakes, Boulder-White Clouds, and Pioneer Mountains Roadless areas should continue to be recommended to Congress for Wilderness designation. The size of any or all of these recommended Wilderness areas should not be reduced to align with the proposed Wilderness boundaries in Representative Mike Simpson's legislation. This legislation has not passed. Reducing the size of these recommended Wilderness areas is an "irreversible and irretrievable commitment of resources" not documented in the DEIS for the Idaho Roadless Rule. (Individual, #1703.24.62200.130)

2-241 Public Concern: The Forest Service should recommend the Borah Peak, Boulder-White Cloud, Pioneer Mountains, West Big Hole, and the Diamond Peak Roadless Areas for Wilderness designation.

The Borah Peak, Boulder-White Cloud, and Pioneer Mountains Roadless areas should continue to be recommended to Congress for Wilderness designation per the locally devised Forest Plans.

The West Big Hole Roadless area should be recommended to Congress for Wilderness designation in line with the proposed recommended Wilderness in the draft Beaverhead-Deerlodge Forest Plan in Montana.

Salmon-Challis National Forest portion of the Diamond Peak Roadless area should be recommended for Wilderness Designation to Congress just as the adjacent portion of the IRA [Inventoried Roadless Area] is on the Caribou-Targhee National Forest. (Individual, #1703.27.62200.160)

2-242 Public Concern: The Forest Service should recommend the Selkirk Wild Land Recreation Area as Wilderness.

The “Selkirk” Wild Land Recreation Area (Long Canyon, Parker Creek, Fisher Creek and Selkirk Crest areas) should be designated “Wilderness,” despite the fact that such designation terrifies the (much diminished) timber industry. I recognize that a Wild Land Recreation designation is the next best thing. (Individual, #1563.4.62200.200)

Ski Areas

2-243 Public Concern: The Forest Service should not classify ski areas in the Primitive management theme.

BECAUSE MANAGEMENT OF SKI AREAS IS INCONSISTENT WITH THIS CLASSIFICATION

Ski area lands do not belong in the Primitive theme. There is an inherent conflict in the management of lands for ski area development and the management of lands to protect primitive roadless characteristics. A ski area and a primitive Roadless Area have fundamentally different characteristics. Forest Service management descriptions for ski areas call for “intensively managed outdoor recreation opportunities” in “highly developed settings.” By contrast, the preamble of the Idaho Proposed Rule describes the desired condition of Primitive theme areas as “relatively undisturbed by human management activities.” Ski areas contain access roads, maintenance roads, ski lift corridors, ski trails, buildings, and winter and summer recreational programs. Ski areas are not “undisturbed,” nor are they managed as “primitive” or even “semi-primitive” areas. They are areas where large amounts of visitation are carefully managed and accommodated on relatively limited acreage. (Special Use permittee, #1805.3.23400.520)

TO PROVIDE FOR LONG-TERM PROJECTED GROWTH

Ski area lands do not belong in the Primitive theme. The ski industry is growing, and flexibility is required to accommodate future growth. Skier/snowboarder visits during the 2000s have averaged 56.7 million annually. Ski areas nationwide have broken visitation records in five of the last six seasons, and the 2007/2008 season is on target to be yet another record season with respect to skier/snowboarder visits. The Agency’s data on types of visitors (NVUM) shows that more people visit National Forests to ski than for any other activity that takes place on the National Forests. It would be short-sighted to take away ski areas’ ability to accommodate the long-term growth that is projected for snow sports in the future through a “Primitive” designation. In light of the Agency’s emphasis on getting “more kids in the woods,” it should be of particular interest that twenty-eight (28) percent of skier/snowboarder visits are by kids under the age of 18. Chief Gail Kimbell has stressed the importance of bringing more kids into the woods “face to face with nature, up close and personal, experiencing the awe and wonder of the great outdoors, and hopefully forging a life-long connection to nature and to public lands.” Developed recreation sites like ski areas provide millions of kids the chance to experience the woods each year. Roadless policy is directly tied to the Agency’s ability to provide these opportunities in the future. Developed recreation sites, which provide the most common access for kids, need flexibility to grow and accommodate increasing recreation visits in the future. (Special Use permittee, #1805.4.23400.520)

2-244 Public Concern: The Forest Service should not allow more ski runs near the Cascade Reservoir.

TO LIMIT THE IMPACT FROM RUNOFF

Cascade Reservoir is already an algae choked mess and it does not need another source of runoff from increased runoff from extra ski runs. (Individual, #309.14.46110.870)

2-245 Public Concern: The Forest Service should correct the inconsistency between the current Recreation Opportunity Spectrum and existing uses of the Lime Creek Roadless Area.

Soldier Mountain respectfully requests that the Idaho Roadless Rule proposal be revised to better align with the existing permitted uses at Soldier Mountain and nearby in the Lime Creek IRA [Inventoried Roadless Area]. There is an inconsistency between the ROS [Recreation Opportunity Spectrum] strategy under the current Management Plan and the existing use of the Lime Creek IRA. While the current ROS strategy calls for 64 percent semi-primitive motorized use during the summer and 84 percent semi-primitive motorized use during the winter, the existing inventoried ROS class of the Lime Creek IRA is 86 percent semi-primitive motorized use in the summer and 98 percent during the winter (USDA 2003 and FEIS for the Southwest Idaho Ecogroup Revision Effort [[USDA 2003b]]). The main objective of the 4.1c management prescription is to provide dispersed recreation opportunities in an unroaded landscape, and the area's environment should appear predominantly natural with slight evidence of the sights and sounds of people. However, commercial downhill skiing and motorized noncommercial recreation is permitted and promoted in the area through Objective 1026, which provides management direction to "provide snowmobiling opportunities outside of Soldier Mountain Ski Area and permitted snowcat skiing" to help meet winter recreation demand. Therefore, the existing management prescription, including the ROS and allowable uses, is inconsistent with the existing heavy, motorized, commercial recreational use of the Lime Creek IRA. (Organization, #1496.1.31000.500)

The proposed Idaho Roadless Rule would designate the Lime Creek IRA [Inventoried Roadless Area] as a Primitive management theme. Under the Idaho Roadless Rule, motorized travel would be restricted to snowmobiles and motorized vehicles less than 50 inches, thereby excluding existing snowcat skiing and recreational uses, which are promoted and allowed under the existing management prescription. The Idaho Roadless Rule assumes that the Lime Creek IRA [Inventoried Roadless Area] currently reflects a "primitive character" including "primitive recreation opportunities, minimal evidence of historical or human use, solitude, and personal risk" due to its designation as Primitive (Idaho Roadless Rule Petition 2006). However, the description of the existing condition of the Lime Creek IRA states that evidence of human disturbance is evident, opportunities for primitive recreation are moderate to low, and approximately 75 percent of recreational use is motorized. In addition, the presence of commercial snowcat skiing and non-system roads is not consistent with the Idaho Roadless Rule's management theme of "Primitive," which would be managed to "remain relatively undisturbed by human management activities" (Idaho Roadless Rule, DEIS 2007). Therefore, the proposed management strategy for the Lime Creek IRA under the Idaho Roadless Rule is not consistent with the existing use of the area, and is even less consistent than the current Management Plan. (Organization, #1496.2.23400.530)

TO ALLOW FOR POSSIBLE FUTURE EXPANSION OF THE SOLDIER MOUNTAIN SKI AREA

The Idaho Roadless Rule does not correct the inconsistency between the current ROS [Recreation Opportunity Spectrum] strategy and existing use of the Lime Creek IRA [Inventoried Roadless Area]. In fact, the proposed Rule would limit ongoing uses as snowmobiling and snowcat skiing near the Soldier Mountain Ski Area, and would severely limit any ski area expansion opportunities in the future. While we currently have no proposal to expand the alpine skiing operation, our long-term visioning does include the potential for alpine skiing on Peaks 1, 2, and 3, in the portion of the Lime Creek IRA to the west and south of our Special Use Permit (SUP) area. (Organization, #1496.3.20000.520)

2-246 Public Concern: The Forest Service should correct the inconsistency between the current Management Plan and the proposed Rule as it relates to the Lime Creek Roadless Area.

TO ENSURE THAT EXPANSION OPPORTUNITIES FOR THE SOLDIER MOUNTAIN SKI AREA ARE MAINTAINED

In the current Management Plan, Recreation Resource Guideline 1033 requires decision makers to "consider potential effects to ski area expansion opportunities when evaluating proposed projects that

are contiguous to the current permit boundary and within two miles of the Soldier Mountain Ski Area” (Sawtooth National Forest Plan 2003). The Idaho Roadless Rule especially, as well as the existing management prescriptions (including the ROS [Recreation Opportunity Spectrum]), is inconsistent with this guideline as ski area expansion opportunities would be limited and restricted due to the management restrictions within the Lime Creek IRA [Inventoried Roadless Area]. (Organization, #1496.4.53000.160)

2-247 Public Concern: The Forest Service should modify the proposed Rule to allow for existing recreational uses on the Lime Creek Roadless Area.

Due to the inconsistencies between existing recreational uses of the Lime Creek IRA [Inventoried Roadless Area] and the allowed uses and ROS [Recreation Opportunity Spectrum] under the existing management prescription and the proposed Idaho Roadless Rule, we request that the Idaho Roadless Rule designation for the Lime Creek IRA be modified to allow for the existing recreational uses (motorized recreation and commercial downhill skiing). (Organization, #1496.6.31000.520)

Roadless Area Boundaries

2-248 Public Concern: The Forest Service should reevaluate the boundaries of the Lime Creek Roadless Area.

The Lime Creek IRA [Inventoried Roadless Area] is described in the Final Environmental Impact Statement for the Southwest Idaho Ecogroup Revision Effort (USDA 2003) as having existing evidence of human activity in the form of “permitted grazing, grazing developments, and heavy recreation use.” The area contains 1.7 miles of unauthorized and 3.7 miles of forest roads, and opportunities for primitive recreation are “moderate to low.” The boundary, as inventoried, would be “difficult to manage for wilderness values due to adjacent timber sale areas and excluded roads that penetrate the defined area” (USDA 2003). Also, “historic and current patterns of motorized recreation use would also contribute to management difficulties” (USDA 2003). Winter recreation in the IRA includes snowmobiling and snowcat skiing, and approximately 75 percent of all recreation use is motorized use. For these reasons, the Lime Creek IRA is unlikely to be considered for addition to Wilderness, and its boundaries should be re-evaluated as directed under Goal WRGO03 (“Update Inventoried Roadless Area boundaries as appropriate to reflect new development or more accurate information”) and Objective WROB03 (“Evaluate any cases where classified roads exist within IRAs to determine whether the road’s status or IRA boundary adjustments are appropriate, and make any needed adjustments”). (Special Use permittee, #1496.5.63000.530)

2-249 Public Concern: The Forest Service should add the Lions Head and Abandon Mountain Areas to the Selkirk Crest Roadless Area.

It is inconceivable that the Lions Head and Abandon Mountain areas are dropped from the Selkirk Crest Roadless Area in the draft plan. These are important, logical portions of that majestic high country system, and should not be carved off. (Individual, #1545.5.63000.200)

Chapter 3: DEIS Analysis and Requested Revisions

General Comments

3-1 Public Concern: The Forest Service should provide a real Programmatic EIS.

TO ESTABLISH THE UNDERLYING “NEED” FOR THE PROPOSED ACTION

The underlying “need” for the proposed action (mining and logging) is really something that should be driven by a real Programmatic EIS that looks at alternatives to phosphate mining for fertilizer (as an example) and alternative locations for mining and logging beyond the Idaho National Forests. Other questions which should be asked include how much will be harvested through mining and logging that will be exported outside of this country, and how does such action tie to “need”? What is the “need” for such a proposed action in relation to the public good and certainly the good of the existing ecosystem? The National Forests provide a long-term resource for all. Mining and logging provide a relatively short-term benefit to a few. Is this a need best served by the general public? (Individual, #749.7.31000.127)

3-2 Public Concern: The Forest Service should have prepared a shorter DEIS.

This interested party isn’t going to make it through 1,050 pages, though thanks for the opportunity. (Individual, #12.1.30000.60)

BECAUSE ITS LENGTH DISCOURAGES PUBLIC COMMENT

I have recently received a copy of the Environmental Impact Statement regarding proposed changes to the 2001 Roadless Rule as these would affect NFS [National Forest System] lands in Idaho. While I appreciate the opportunity to comment on this EIS, I must observe that this fairly technical 528-page document plus its 604-page appendix is hardly likely to encourage wide public comment on the specific proposals contained in it. Too lengthy. (Individual, #10.1.30000.60)

3-3 Public Concern: The Forest Service should revise the Purpose and Need section.

TO COMPLY WITH NEPA

The DEIS fails NEPA and is inadequate. There are several problems with the DEIS. The Purpose and Need [section] of the DEIS is seriously flawed. (Organization, #1800.11.32000.131)

TO CLARIFY THE NEED FOR FLEXIBILITY

The Purpose and Need [section] of the DEIS is seriously flawed. Existing laws already cover the issues raised in Chapter 1 such as HFRA [Healthy Forests Restoration Act]. What so-called flexibility is not available under existing laws? The DEIS simply makes an allegation without looking at any specific problems or concerns. (Organization, #1800.28.31000.130)

3-4 Public Concern: The Forest Service should include a transparent Purpose and Need and an impacts analysis.

TO COMPLY WITH NEPA

In summary, this DEIS does not have a transparent Purpose and Need [section]. It does not present the conclusions reached and results of analyses performed in evaluating impacts because there have been no analyses conducted. The DEIS has declared that impacts will not happen as a result of its new proposed policy so there is nothing to evaluate . . . even though it establishes a precedent for future actions which are reasonably foreseeable and whose impacts could be bounded, and which, under NEPA are

considered Significant. This DEIS attempts to obviate its responsibility under NEPA by stating that as each new project comes up, impacts from that new project that would occur as a result of this new policy will be evaluated. However such impact analyses would be evaluated in a piece meal fashion (segmentation) and would not have the benefit of tiering down from cumulative impact analyses that should be performed now and mitigations that should be committed to now in a higher level EIS . . . and equally important . . . prior to the decision to change the 2001 Roadless Rule. The approach taken makes the subject document moot as an aid in any decision process, and as such, does not fulfill its obligation under the National Environmental Policy Act. (Individual, #749.8.32000.2)

3-5 Public Concern: The Forest Service should accurately disclose “non-conforming” uses in the Final EIS.

TO INFORM THE PUBLIC OF THE ACTUAL CHARACTER OF SPECIFIC ROADLESS AREAS

“Roadless Areas” are often portrayed by the Agency and many Wilderness advocacy groups to be “pristine” and “last remaining undeveloped lands,” often ignoring or downplaying the valid and legal non-conforming uses existing in these areas (please see comment below). The general public therefore lacks a clear understanding of the actual character of these lands as well as the activities that are allowed there. This is why accurate disclosure of the “non-conforming” uses allowed in Roadless Areas is imperative in the Final EIS and Final Rule. Like it or not, the U.S. Forest Service has created this “Roadless Area” construct, directly tied to its mandated Wilderness inventory and review, but allowed snowmobile, motorized, mountain bike and a myriad of other “non-conforming” uses that are not allowed in Wilderness. (Organization, #1801.14.31000.500)

3-6 Public Concern: The Forest Service should revise the DEIS to comply with NEPA.

TO PROVIDE NEEDED INFORMATION TO THE PUBLIC

Changing the F[inal] EIS won't be adequate. To make this process [the DEIS] comply with NEPA, it will require an entirely new draft. For example, changing individual Roadless Area boundaries without a detailed reason as to why and without public input on those boundary changes violates NEPA. At a minimum, a new draft is needed for the public to see exactly what is being proposed and why. (Organization, #1800.48.32000.131)

BECAUSE THE RULE WILL DIRECTLY AFFECT THE ENVIRONMENT

The DEIS states that the Idaho Rule would have no environmental effects because it is programmatic in nature. Even with its programmatic intent, there will be direct environmental effects associated with the Idaho Rule. An example of this is the Smoky Canyon Mine in Southeast Idaho. Other than significant effects to water quality and local environmental and health concerns, one of the primary roadblocks for the permission of the project is the existing 2001 Rule. That 2001 Rule prohibits the expansion of roads into new lease areas, such as the expansion of the Smoky Canyon Mine Panels F&G.

If the 2001 Rule prohibitions are removed, as is proposed in the proposed Idaho Rule, those current prohibitions would be removed, resulting in the permission of the mine expansion. It is useful to apply analogies to this situation. The board game Jenga provides a good comparison. By removing blocks from a tower, one at a time, a structure can maintain its integrity and remain standing until the removal of a critical block causes the structure to collapse. In a way, the Smoky Canyon FEIS has removed each of those critical blocks, except one. That final block would be removed by the proposed Idaho Rule, resulting in the collapse of the tower, or in this case, the effects associated with the Smoky Canyon Mine expansion.

Further, the argument that specific rules do not directly affect the environment has been the subject of numerous legal rulings that have consistently affirmed and reaffirmed that they do have on-the-ground impacts. Even the Forest Service should recognize that programmatic land management rules have on-the-ground impacts, because they require lands to be managed in a particular way. This plays a role in [the] NEPA, NFMA [National Forest Management Act], and ESA [Endangered Species Act] shortcomings of the DEIS. (Preservation/Conservation, Boise, ID - #4156.66.31000.130)

TO PROVIDE A SCIENTIFICALLY AND QUANTITATIVELY CREDIBLE ANALYSIS OF EFFECTS

If anything, NEPA is a disclosure process. This DEIS has violated NEPA by not fully disclosing the intent, the environmental effects and impacts, and mitigation measures associated with the Proposed Action. It violates NEPA by not presenting an objective evaluation and analysis of a reasonable range of alternatives. The DEIS has failed to present a single assessment that is scientifically and quantitatively credible. The DEIS presents a fatally-flawed and self-serving comparison of “apples and oranges.” The DEIS hides behind its programmatic mantra of “don’t worry-no direct authorization.” The DEIS has violated NEPA by not adequately scoping the proposal to acquire regional and national perspectives. (Individual, #268.74.32000.720)

BECAUSE PRO FORMA COMPLIANCE WITH NEPA IS NOT ACCEPTABLE

“(G)udging pro forma compliance [with NEPA] will not do.[Footnote 6: *Lathan v. Brinegar*, 506 F.2d 677,693 (9th Cir 1974)]. NEPA contemplates a decision process based on all the relevant factors. And the courts can, and should, require full, fair, bona fide compliance with NEPA [Footnote 7: *Ibid*]. (Recreation/Conservation Organization, #1649.16.32000.720)

TO PROVIDE ADEQUATE INFORMATION TO DECISION MAKERS

“Furthermore, it is well settled that a NEPA document must provide the decision-maker with adequate information to fully assess the impacts of an action. If the decision was reached procedurally, without individualized consideration and balancing of environmental factors—conducted fully and in good faith—it is the responsibility of the courts to reverse” [Footnote 5: *Calvert Cliffs’ Coordinating Committee v. U.S. Atomic Energy Commission*, 449 F.2d 1109, 115 (D.C. Cir. 1971); 42 U.S.C Section 4332 (1976)]. The DEIS makes the case that it is simply a programmatic document. (Recreation/Conservation Organization, #1649.15.32000.720)

The DEIS falls short of the requirements of NEPA and fails to provide adequate baseline information to the Tribes [Shoshone-Bannock Tribes] to make an informed decision about the impact of the Rule on individual Forests and IRAs [Inventoried Roadless Areas]. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.13.32000.200)

The public and the decision maker are told at the outset: The Forest Service, in cooperation with the State, has completed a review of the social, economic, and environmental characteristics and values associated with the Inventoried Roadless Areas in the State [Footnote 2: *Special Areas; Roadless Area Conservation; Applicability to the National Forests in Idaho* Federal Register, January 7, 2008. at 1137. (Hereinafter Idaho Rule)]. However, the DEIS does not meet either the intent or the requirements of the National Environmental Policy Act (NEPA). The NEPA is our basic national charter for protection of the environment. It establishes policy, sets goals (Section 101), and provides means (Section 102), for carrying out the policy. Section 102(2) contains “action forcing” provisions to make sure federal agencies act according to the letter and spirit of the Act. “The purpose of NEPA is to assure that federal agencies are fully aware of the present and future environmental impact of their decisions. Additionally, the preparation of an EIS ensures that other officials, Congress, and the public can evaluate the environmental consequences independently. [Footnote 3: *3 Columbia Basin Land Protection Ass’n v. Schlesinger*, 643 F.2d 585, 592 (9th Cir. 1981). NEPA’s “intent is to ‘focus the agency’s attention on the environmental consequences of a proposed project,’ to ‘guarantee that the relevant information will be made available to the larger audience that may also play a role’ in forming and implementing the agency’s decision, and to provide other governmental bodies that may be affected with ‘adequate notice of the expected consequences and the opportunity to plan and implement corrective measures in a timely manner.’” [Footnote 4: *Davis v. Mineta*, 302 F.3d 1104, 114 n.5 (10th Cir. 2002) (quoting *Robertson v. Methow Valley Citizens Council*, 490 US. 332, 349-50 (1989) (alternations in the original)]. (Organization, #1649.14.32000.131)

BECAUSE ROADLESS AREA BOUNDARIES WERE CHANGED WITHOUT PUBLIC INPUT

The DEIS fails NEPA and is inadequate. There are several problems with the DEIS. The Roadless Area boundaries have been changed without going through public input. (Organization, #1800.10.32000.60)

BECAUSE THE DEIS DOES NOT TAKE A “HARD LOOK” AT POTENTIAL IMPACTS

NEPA also requires that agency EISs take a “hard look” at the potential environmental impacts of their proposed actions [Footnote 8: Robertson, 490 US. at 350]. Agencies must comply with NEPA procedures that are designed to ensure a complete and thorough environmental analysis. To take the required “hard look” at a proposal’s effects, in this case the proposed Idaho Roadless Rule, an agency may not rely on incorrect assumptions in an EIS [Footnote 9: CFR § 1500.I (b) (“Accurate scientific analysis, expert agency comments and public scrutiny are essential to implementing NEPA”) (Organization, #1649.17.32000.131)]

The DEIS released by the USDA [U.S. Department of Agriculture] falls short of the required analysis under the National Environmental Policy Act (NEPA) and fails to adequately discuss the impacts of the Proposed Rule. NEPA requires that an agency take a “hard look” at a proposed action prior to making a decision and allowing for public comments to shape that decision. The Proposed Rule failed to incorporate adequate baseline information, such as maps for each Roadless Area in the State affected by the Rule change. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.6.32000.620)

BECAUSE THE LACK OF ANALYSIS OF PHOSPHATE MINING VIOLATES NEPA

The DEIS appears to violate NEPA. By complying with NEPA, the public is assured that “federal agencies are fully aware of the present and future environmental impact of their decisions. Additionally, the preparation of an EIS ensures that other officials, Congress, and the public can evaluate the environmental consequences independently.” [Footnote 1: Columbia Basin Land Protection Ass’n v. Schlesinger, 643 F.2d 585, 592 (9th Cir. 1981).] Clearly, the proposed Idaho Rule DEIS does not fully inform the public of the extremely harmful consequences of phosphate mining. The DEIS glosses over selenium contamination, stating that “mining would reduce the noncommodity values, amenities, environmental functions, and non-use values in a portion of these seven Roadless Areas.” The agencies charged with oversight of these lands have known of the serious and expanding selenium contamination problem for decades, yet chose to make light of them, thus depriving the public of their right to be fully informed. This is a violation of NEPA. And, can the DEIS legally replace a national EIS? (Organization, #1697.24.32000.423)

BECAUSE THE DEIS LACKS SITE-SPECIFIC INFORMATION

The DEIS fails NEPA and is inadequate. There are several problems with the DEIS. There is a lack of adequate site-specific information in general on individual Roadless Areas. (Organization, #1800.9.32000.620)

BECAUSE THE DEIS AMOUNTS TO A FOREST PLAN REVISION

The DEIS fails NEPA and is inadequate. There are several problems with the DEIS. The DEIS amounts to a Forest Plan revision, not an amendment, for each of the National Forests involved. Why wasn’t this presented as such in the DEIS? (Organization, #1800.8.31000.160)

3-7 Public Concern: The Forest Service should accurately represent the 2001 Rule in the DEIS.

TO ENSURE A FAIR AND ACCURATE EVALUATION OF THE ALTERNATIVES

It is unclear why the DEIS presents such a strong bias against the 2001 Roadless Rule. The analysis of the 2001 Rule and its exceptions are not accurately portrayed, and as a result, the DEIS appears to reach a conclusion that the 2001 Rule is not responsive. We [Idaho Conservation League] respectfully disagree.

We do not feel that the 2001 Rule is accurately represented in the DEIS. As a result, the analysis is skewed with a bias that prevents a fair and accurate evaluation of the alternatives. This fails the test of NEPA to accurately and objectively evaluate the effect of alternatives on the human and natural environment. (Preservation/Conservation, Boise, ID - #4156.63.31000.131)

3-8 Public Concern: The Forest Service should provide sufficient baseline data.

TO ALLOW FOR ADEQUATE ASSESMENT OF IMPACTS TO TRIBES

The risks to the Tribes [Shoshone-Bannock] rights and interests cannot be adequately assessed given the insufficient baseline data reflected in the DEIS. The management of Idaho's IRAs [Inventoried Roadless Areas] under the Proposed Rule may have direct, indirect, and cumulative impacts to the rights and interests, guaranteed by Treaty [Fort Bridger Treaty of 1868] and Federal Laws/Policies, as well as established policies of the Tribes. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.39.31000.150)

3-9 Public Concern: The Forest Service should provide a full analysis of the effects of the Idaho Roadless Rule on each Roadless Area affected.

BECAUSE THE IDAHO ROADLESS RULE REDUCES EXISTING PROTECTIONS

This Idaho Roadless Rule will create a new category of industrial forestland (called in this EIS, "General Forest"), which will immediately receive less environmental analysis than it would have prior to this Roadless Rule. This change of the process in eliminating Roadless Areas will require a full analysis of the effects of this Rule on each Roadless Area involved. Among the other things, this analysis will include USFWS [U.S. Fish and Wildlife Service] consultation, concurrence with existing Forest Plans, and NFMA [National Forest Management Act] regulations, not to mention Clean Water Act and Clean Air Act compliance. This same logic is true for the newly defined "Backcountry/Restoration" (not to mention the logging that will now be allowed within "Primitive" category created by this Roadless Rule. The areas released to the State for pork barrel (e.g., logging, mineral development, and other extraction purposes) require full disclosure in this document. (Preservation/Conservation, Lenore, ID - #6543.9.31000.130)

3-10 Public Concern: The Forest Service should perform individual environmental analysis for each Roadless Area in the Caribou-Targhee National Forest.

TO COMPLY WITH THE NATIONAL FOREST MANAGEMENT ACT REQUIREMENT TO PROTECT BIOLOGICAL DIVERSITY

The Tribes [Shoshone-Bannock] demand that the FS [Forest Service] re-evaluate the importance of the CTNF [Caribou-Targhee National Forest] lands by performing an individual environmental analysis for each IRA [Inventoried Roadless Area] in the CTNF. This demand is in line with the FS mandate in NFMA [National Forest Management Act] to provide for biological diversity. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.76.30000.133)

3-11 Public Concern: The Forest Service should provide a separate EIS for Caribou-Targhee National Forest and every other Roadless Area.

TO ANALYZE IMPACTS TO TRIBAL RIGHTS, RESOURCES, AND CULTURE

The CTNF [Caribou-Targhee National Forest] is heavily relied upon by the Shoshone-Bannock Tribes for subsistence hunting/gathering and traditional cultural practices. The Proposed Rule designates vast tracts of the CTNF as GFRG [General Forest, Rangeland, and Grassland] theme, allowing for the further degradation of the area known as the phosphate deposit region, as well as multiple levels of development activities permitted in the GFRG theme. Mining phosphorous is a destructive activity that permanently modifies the landscape and may adversely impact watersheds with toxic levels of selenium and other contaminants, poisoning fish and wildlife ... It has been demonstrated that the selenium contamination increases the risk of permanent deformities or genetic mutations, which causes mortality among the genetically distinct segments of resident salmonids.

The CTNF areas provide [sic] to the diverse Idaho's forestlands because they exhibit all of the natural features necessary for subsistence resources, which are becoming increasingly rare in southern Idaho. The woodlands, shrub-steppe and aspen-conifer plant communities provide key habitat for wildlife and

allow for a wide range of botanical diversity. The Proposed Rule designates only a fraction of the lands in the CTNF under more protective themes than BCR [Backcountry/Restoration] or GFRG, and does not justify the impacts on the Caribou portion. The Tribes demand that a separate EIS be developed specifically for the Caribou and every Roadless Area within the Forest to discuss the actual and foreseeable impacts from the proposed Rule to Tribal rights, resources, and traditional cultural practices. The IRAs [Inventoried Roadless Areas] within the Caribou section are held in highest regard by the Tribes due to the significant ties to Tribal rights, resources, and history. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.54-55.30000.760)

3-12 Public Concern: The Forest Service should not justify developing Inventoried Roadless Areas based on their relative abundance in any given state.

BECAUSE THEY ARE SCARCE AT THE NATIONAL LEVEL

As the Forest Service has already determined in the Roadless Rule F[inal] EIS, the local relative abundance of IRAs [Inventoried Roadless Areas] in places like Idaho does not justify developing them. At the national level, IRAs are scarce, representing the scattered remnants of our forest heritage. Particularly rare are places with a relative abundance of intact ecosystems. While local decision making about their fate may be intuitively appealing in some situations, it is precisely this process which leads to their overall loss and the loss of all of the public values that make them important—both to local residents and the public at large. (Organization, #1824.21.10110.200)

3-13 Public Concern: The Forest Service should classify inventoried areas accurately in relation to their roaded character.

BECAUSE MANY AREAS CLASSIFIED AS ROADLESS ACTUALLY HAVE ROADS

This DEIS created a new management class, “Roadless.” These areas are not roadless and for the most part have not been recommended as suitable for wilderness consideration after extensive study by the Forest Service. If some single classification is to be used for these areas, it should at least accurately reflect that there are roads in these areas. Perhaps “Areas evaluated for their wilderness potential” would be a more accurate characterization of these areas. (Individual, #1825.38.31000.650)

Relationship to Forest Plans

3-14 Public Concern: The Forest Service should revisit the rationale for using the Forest Plan baseline approach.

BECAUSE IT DOES NOT REPRESENT THE “BEST CONSENSUS OF THE PUBLIC”

The first [of the] Guiding Principles—the Forest Plan Baseline principle—established the existing Forest Plan prescriptions as the starting point in considering the site-specific recommendations (from counties, the public, and other participants). A primary rationale for this guideline (stated in the Petition) is that “Forest Plans represent the ‘best consensus’ of the public.” Many would argue that the 2001 Rule represents the “best consensus” of the public. By using the Forest Plan Baseline, recommendations that were similar to the existing Forest Plans had more weight than those similar to the 2001 Roadless Rule. (Individual, #1695.13.20000.60)

3-15 Public Concern: The Forest Service should clarify the relationship between the proposed Idaho Roadless Rule and Forest Plans.

It has not been made clear in the DEIS how the Idaho Roadless Rule will preclude future forest planning efforts; whether or not the rule supersedes current or future Forest Plans; or to what degree it affects the implementation of existing Forest Plans, regional or national plans, standards or guidance. (Individual, #1703.34.31000.100)

3-16 Public Concern: The Forest Service should clearly establish who retains what authority regarding Forest Plans and the Idaho Roadless Rule.

TO ESTABLISH ACCOUNTABILITY AND TRANSPARENCY

Some statements are ambiguous and further clarification is necessary, such as Federal Register, pp. 1137 which states, "It is also consistent with the Secretary's authority to establish regulations to carry out the statutory requirements for planning and the Forest Service's practice that forest plans must yield to management direction of a higher order." Does this mean that the President (or others) can override any plan or rule? Credibility and transparency, which are sorely lacking throughout the Bush administration, must be established. Also, pp. 1153 #294.25, Timber cutting, sale . . . (1) Please define "for personal or administrative use." (Individual, #1475.5.31000.720)

3-17 Public Concern: The Forest Service should not rely on Forest Plans undergoing revision to form the basis for the Idaho Roadless Rule.

BECAUSE SOME ARE NOT COMPLETE AND HAVE NOT BEEN MADE AVAILABLE FOR PUBLIC COMMENT

Concerns over roadless reinventory exist on the Clearwater and Nez Perce National Forests, which are currently undergoing [Forest] Plan revision. Areas on the Nez Perce include Meadow Creek, which should be delineated as a single Roadless Area. The South Fork [Clearwater River] Landscape Assessment identified unroaded areas adjacent to Meadow Creek that should have been included in the Draft Revised Forest Plan. Because the NEPA analysis for that Forest Plan has not been completed, the reliance on this incomplete information to form the basis for the Idaho Rule is inappropriate. In fact, the proposed Clearwater and Nez Perce Forest Plans have not even been made available for a public comment period. (Preservation/Conservation, Boise, ID - #4156.147.20000.160)

3-18 Public Concern: The Forest Service should not rely on existing Forest Plans for resource protection and mitigation.

BECAUSE MANY FOREST PLANS ARE OUTDATED OR DID NOT ESTABLISH STANDARDS AND GUIDELINES

Even if the impacts [of the Idaho Roadless Rule] were "negligible," the assumption that all resources would be protected or mitigated under existing Forest Plan guidelines assumes that each of these resources have existing protections under Forest Plans. Several Forest Plans are outdated, or did not establish standards and guidelines to protect these and other resources, and the assumption that they would be protected is unsupported. (Preservation/Conservation, Boise, ID - #4156.23.20000.160)

BECAUSE MANY OF THE FOREST PLANS ARE INCOMPLETE, CONCERNS IN THE PLANS HAVE NOT BEEN ADDRESSED, AND THE IDAHO ROADLESS RULE IS NOT CONSISTENT WITH THE PLANS

The proposed Idaho Rule relies on incomplete proposed revised plans for the Idaho Panhandle, Kootenai, Clearwater, and Nez Perce National Forests. It is inappropriate to tier to incomplete NEPA analysis, and incorporation of proposed plans represents a pre-decisional determination that proposed plans will be finalized without change. Further, specific concerns raised with regards to Roadless Area Inventories in proposed Forest Plans have not been addressed in response to comments filed by the Idaho Conservation League. Finally, the Idaho Rule fails to accurately mirror existing Forest Plan guidance and places many Idaho Roadless Areas into management themes that are inconsistent with existing Forest Plan guidance. These changes, which remove existing protections, and therefore directly affect the environment have not been adequately analyzed in the DEIS. (Preservation/Conservation, Boise, ID - #4156.107.31000.160)

3-19 Public Concern: The Forest Service should not tier the DEIS off of existing Forest Plans.

BECAUSE NOT ALL FOREST PLANS EVALUATE ROADLESS ISSUES

As stated in the Idaho DEIS, in the public involvement section in Chapter 1 (page 33) and in the alternatives considered section in Chapter 2 (page 45), the Idaho management themes rely on NEPA

analysis and formulation from existing or proposed Forest Plans. As stated in the Idaho DEIS, the 10 National Forests are at various stages in National Forest Management Act compliance with Forest Plan revisions required every 10 to 15 years. There are also additional distinctions between the relevancy of NEPA analysis related to roadless characteristics and values from existing or proposed Idaho Forest Plans, which is not revealed or assessed in the Idaho Rule DEIS. Management themes cannot be assigned in any consistency when Idaho Forest Plans are inconsistent in NEPA analysis for roadless issues. Some of these Forest Plans are outdated and [were] completed before any consideration of current roadless environmental issues was considered in the 2001 Rule. At least one proposed plan, the Idaho Panhandle, conducted a NEPA analysis based on repeal of the 2001 Roadless Rule.

Only the three forests of the Southwest Idaho Eco-group (SWIE)—the Boise, Payette and Sawtooth—conducted any NEPA analysis based on roadless characteristics established by the 2001 Rule to determine Management Prescription Categories. Only these three forests have any connection between the NEPA analysis of 2001 Rule and the Forest Plans approved with a Record of Decision (ROD) in 2003. The ROD for the Caribou and Targhee National Forests predated the 2001 Rule and has no connection in establishing roadless characteristics or values as criteria for management. The Idaho DEIS states (page 33) that three other Idaho National Forests have initiated Forest Plan revision (presumably Idaho Panhandle, Clearwater and Nez Perce), and two others have not started revision (presumably Salmon and Challis.) This information conflicts with the description of Forest Plan revision process stated in Footnote #15, page 45, which lists 12 National Forests in Idaho, not 10 as is referred to on page 33 and in a different configuration of Forest Plan revision process. (Preservation/Conservation, #1693.43-44.32000.206)

3-20 Public Concern: The Forest Service should not rely on or tier to the Caribou National Forest Plan.

BECAUSE THE LACK OF DISCLOSURE AND ANALYSIS RELATED TO PHOSPHATE MINING VIOLATES NEPA

The Forest Service cannot rely on or tier to analysis in the Caribou National Forest Revised Forest Plan (CNF RFP) on phosphate mining for its disclosure requirements in the Idaho Rule DEIS. The CNF RFP analysis falls substantially short in disclosing the effects of phosphate mining. As examples we've included the primary "disclosure" and analysis in reference to phosphate mining and selenium contamination from the CNF RFP Final EIS. From our review, we believe the quoted sections that reference CERCLA [Comprehensive Environmental Response Compensation and Liability Act] (Superfund) issues below in the RFP [Revised Forest Plan] are the sum total of that discussion in the FEIS. Given that there are now 17 Superfund sites in the phosphate mining area and that partial cleanup at only one of those sites has only recently been undertaken, it would appear that the analysis in the CNF RFP FEIS, and the total lack of disclosure and analysis of this issue in the Idaho Rule is a violation of NEPA's disclosure and analysis requirements. As examples: Since the discovery that the release of Selenium at phosphate mine sites was an environmental concern, many changes to accepted mining and reclamation methods have been implemented. It must be noted that these methods are unproven. Monitoring and evaluation are not complete. The methods discussed below are theoretical at this time. [Footnote 78: CNF RFP FEIS at 3-136]

The Forest Service is managing the South Maybe Canyon site with Comprehensive Environmental Response and Compensation Liability Act (CERCLA) authorities provided in Executive Order 12580. Plans and orders are under development to investigate releases at seven additional sites under the same authority. An Engineering Evaluation and Cost Analysis (EE/CA) will be prepared for each site once the investigation is completed to develop action alternatives to remediate identified releases. Applicable Relevant and Appropriate Requirements (ARARs) will be used to establish remedial action levels. CERCLA actions are outside the scope of the Forest Plan Revision. However, the standards and guidelines developed here will be evaluated as ARARs are incorporated as appropriate into remedial alternatives. Monitoring will be implemented at each site to determine remedial success. Subsequent actions may be necessary at those sites where remediation is not successful. [Footnote 79: Ibid. at 3-137 & 138.] Cleanup or removal actions associated with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), including any necessary cleanup or remediation of hazardous substances from phosphate mining-related activities, are outside the scope of the Revised Forest Plan and are not subject to the direction contained in the Revised Plan. Pg. 4-102 [Footnote 80:

Ibid. at 3-137 & 138.] The determination that these prescriptive measures would be successful in controlling or reducing selenium and other metal discharges has not yet been established through monitoring efforts. [Footnote 81: Ibid. at 4-107].

Selenium and other hazardous substances have been found within and downstream from many of the current and past operations. A Task Group, made up of private, state, and federal individuals and agencies, is currently working on the problem. A charge of this group is to specify mitigation and management practices needed to control these substances. Once identified, these measures will be implemented no matter which alternative is chosen. [Footnote 82: Ibid. at 4-127]. A team consisting of land managers, researchers and mining engineers is currently researching best methods of controlling selenium releases into the environment. As knowledge is gained, this knowledge can be readily applied to ongoing and future mining activities, reducing contamination potentials from selenium. [Footnote 83: Ibid. at 4-141]. Surface run-off and discharge to surface water and to shallow groundwater in alluvium from overburden dumps has elevated levels of selenium in Maybe Creek and Pole Canyon (AMS 1999). A multi-agency team is assessing and developing measures to deal with this concern. State of Idaho Best Management Practices for the Mining Industry and Region 4 Reclamation Guides are used as applicable. [Footnote 84: Ibid. at 4-268.]

Cleanup or removal actions associated with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), including any necessary cleanup or remediation of hazardous substances from phosphate mining-related activities, are outside the scope of the Revised Forest Plan and are not subject to the direction contained in the Revised Plan. [Footnote 85: Ibid. at 4-102]. It is quite apparent that the CNF RFP FEIS never took a hard look at the impacts of phosphate mining, including clean up of the existing Superfund sites. Instead it, like this flawed DEIS, punted. It deferred to the future, to site-specific NEPA analysis, to disclose and analyze impacts and make decisions. As pointed out in our analysis of the Smoky Canyon Mine proposed expansion, that strategy was and is flawed as well. Rather than continue down the road of site-specific analysis, a strategy that leads to even more pollution and contamination, the agencies need to conduct a proper and legally sufficient analysis of the effects of phosphate mining in Roadless Areas now. (Organization, #1649.67-70.32000.423)

Management Theme Descriptions

3-21 Public Concern: The Forest Service should integrate all relevant management activities with those of any given Roadless Area management theme.

TO EFFECTIVELY EVALUATE CUMULATIVE IMPACTS

The Proposed Action does not address grazing, travel management, or wildland fire use. Management related to these activities would be regulated by other existing regulatory and analytical processes (for example, travel planning). This is another example of failure to properly integrate other management activities with those of a specific IRR [Idaho Roadless Rule] theme. There is no disclosure here. How would you evaluate cumulative impacts in a roadless watershed subjected to grazing, timber harvest, mining, and road construction? Regulatory and analytical processes vary by forest and Forest Plan. Where is the common thread in this analysis? You have ignored these critical issues in your process. (Individual, #268.26.31000.160)

3-22 Public Concern: The Forest Service should revisit the assumptions and criteria of the Backcountry/Restoration management theme.

BECAUSE THE COMPARISON TO THE 2001 ROADLESS RULE IS BASED ON FALSE ASSUMPTIONS

In the Idaho DEIS, the assumption is made to assign the management direction for the 2001 Rule into the Backcountry/Restoration management theme of the Idaho Rule. This assumption is not based on a coherent reading of the Idaho DEIS facts. Additional logging and road building is allowed in the Backcountry theme to manage for ill-defined “significant risk of wildfire effects” or “forest health activities,” which is expressly prohibited in all of the 9.3 million acres of roadless forests in Idaho

through the 2001 Rule. With additional logging and road building provisions, Backcountry does not equal the 2001 Rule. To claim Backcountry is “generally equivalent” to the 2001 Rule (page 41) is wrong and misleading, making all future Idaho Rule and 2001 Rule management theme comparisons based on false assumptions not backed by the Idaho DEIS and the 2001 Final Rule facts. (Organization, #1693.46.31000.600)

BECAUSE SUBSTANTIALLY ALTERED LAND IS BEING ERRONEOUSLY INCLUDED UNDER THIS THEME

In the Backcountry/Restoration theme management direction under 2.c., there is a category of land area that is identified as being substantially altered. Why, indeed, is this type of land being included in the Roadless Plan proposal? It obviously is roaded and has been harvested and should fit in the General management theme. It should have been excluded under the numerous criteria that were supposed to be used to evaluate the Roadless Areas. These are errors of omission and should not be included—making them an error of commission if not excluded from this theme. (Individual, #760.9.23100.620)

TO CLOSE LOOPHOLES CURRENTLY EXISTING IN THE THEME

Major loopholes characterize the Backcountry/Restoration theme. My experience with Forest Service management in Idaho is that a loophole given is a loophole taken repeatedly. Managing with timber harvest and road construction to retain the undeveloped character of Roadless Areas is a basic contradiction—an oxymoron. (Individual, #268.10.23500.720)

BECAUSE THE BACKCOUNTRY MANAGEMENT THEME MAY NOT BE ADEQUATELY PROTECTIVE

Furthermore, even if a themed approach is ultimately pursued, Outdoor Alliance questions whether the “Backcountry” theme identified in the proposed IRR [Idaho Roadless Rule] will be adequately protective. The proposed IRR allows road construction in Idaho Roadless Areas designated to be managed pursuant to the Backcountry theme when roads are needed to protect public health and safety in cases of significant risk or imminent threat of flood, wildland fire, or other catastrophic event that, without intervention, would cause the loss of life or property; or to facilitate forest health activities permitted under § 294.25(c)(1) [Footnote 6: 73 Fed. Reg. 1135, 1152.] The proposed IRR further elaborates that the provision contemplates: access for (1) areas where wind throw, blowdown, ice storm damage, or the existence or imminent threat of an insect or disease epidemic is significantly threatening ecosystem components or resource values that may contribute to significant risk of wildland fire; or (2) areas where wildland fire poses a threat to, and where the natural fire regimes are important for, threatened and endangered species or their habitat consistent with HFRA. [Healthy Forests Restoration Act] [Footnote 7: Id. at 1139] This broad language appears to offer too many avenues to build roads in too large a portion of the Roadless Areas in Idaho when the local ecosystem can likely take care of itself. Indeed, forests in Idaho naturally exhibit a mosaic of insect infestations, blow down, and fire (and have done so for quite a long time). Equally upsetting, the IRR notes that in Backcountry areas, road construction or reconstruction is allowed for the leasing of phosphate materials. [Footnote 8: Id. At 1141] (Organization, #1821.18.23500.100)

BECAUSE TIMBER HARVEST UNDER THIS THEME WILL REQUIRE TEMPORARY ROADS

Logging as proposed in the DEIS within the Backcountry theme will require “temporary roads.” Construction of these roads will not “restore” the backcountry and in fact will convert it to run of the mill “front-country.” The corridor that is created by a “temporary road” cannot be eliminated from the landscape. Even with the best restoration, these roads disrupt natural water flows and increase the risk of unnatural landslides. (Individual, #1482.8.64300.2)

3-23 Public Concern: The Forest Service should complete further NEPA analysis on Roadless Areas classified as General Forest or Backcountry/Restoration.

The proposed Rule does not prescribe nor does it specifically authorize any project within an IRA [Inventoried Roadless Area]. The United States Department of Agriculture (USDA) indicates that there is no change in the physical environment because the proposed Rule is programmatic in nature. However, [because of] theme designation and the scope of reasonably foreseeable actions that will likely occur within IRAs under the themes of General Forest, Rangeland, and Grassland (GFRG) or

Backcountry/Restoration (BCR), it is appropriate to request further NEPA analysis for every IRA containing GFRG or BCR, before a final decision is rendered. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.27.23100.131)

3-24 Public Concern: The Forest Service should revisit fuel reduction prescriptions under the proposed Wild Land Recreation and Primitive management themes.

BECAUSE THESE THEMES AS DEFINED INVITE MISUSE OF TIMBER HARVESTING

The Petition Plan would manage another 608,000 acres under the even less restrictive guidelines of the General Forest, Rangeland and Grassland [management] theme, which in effect would remove this acreage from the roadless land base. Most of the remaining IRA [Inventoried Roadless Area] lands—about 3 million acres—would be placed into either the Wild Land Recreation (WLR) or Primitive themes. As Petition proponents correctly claim, these two themes have more restrictive road building guidelines than the 2001 Rule. The lands in the WLR category have been previously identified by the USFS as recommended Wilderness (NWPS [National Wilderness Preservation System]) and would receive equivalent NWPS protection under the Idaho Petition’s Plan. But, while the Petition’s WLR and Primitive themes may provide more restrictive guidelines than the 2001 Rule, other factors minimize the advantage. In the case of the WLR theme, Ch. 3.12 of the DEIS notes that under the 2001 Rule, (that plan’s) logging and road building options are unlikely to be applied in the WLR areas. This is because the existing Forest Plans also recognize those lands as “recommended wilderness areas” and therefore already prohibit roadwork and logging. Under 2001 Rule management, the Forest Service would be unlikely to lift the logging and road building ban. The DEIS concludes: “The 2001 Roadless Rule would not affect recommended wilderness areas.” As for the Primitive theme, it prohibits road construction (that the 2001 Rule might allow). However, logging (without road construction) would still be permitted for forest health, fuel reduction, and habitat improvement tasks. In fact, since the Petition Plan would authorize fuel reduction activities to prevent normal as well as uncharacteristic fire events, an increase or misuse of this permission seems more likely under the Petition Plan. (Individual, #1695.4.23100.260)

3-25 Public Concern: The Forest Service should clarify the relationship between Forest Plans and the Idaho Roadless Rule management themes.

BECAUSE MANY CRUCIAL QUESTIONS REMAIN REGARDING THE MANAGEMENT THEMES

Confusion of how many forests there are; at what stage of forest planning required by NFMA [National Forest Management Act] each forest is; and what the relationship is between the Idaho Rule and an existing or a proposed, a revised, or an outdated Forest Plan must be cleared up before any analysis can proceed. What National Forests have revised plans and at what date was the ROD [Record of Decision]? What NEPA analysis was done on Roadless Area values or characteristics in these revised plans or the unrevised plans and how does it apply to the Idaho Rule? What is the relationship between a proposed revised plan and the Idaho Rule, especially when it’s unknown when or if a proposed plan will be approved with ROD and what will be in it? What is the relationship between management themes and MPC [management prescription category] or other management categorization from Forest Plans? The key issue is—How was each forest’s existing or proposed Forest Plan used to create and to assign management themes? When there is an inconsistent set of information sources through existing, proposed, old, and revised [Forest] Plans, it is impossible to track how it was applied to management themes, which is the foundation of the Idaho Rule. The problems with management themes based on the variable Forest Plan NEPA analysis, or lack thereof, is systemic to the Idaho Rule management theme creation and application. There are no consistent management directives for Roadless Areas based on Forest Plans, except for the three SWIE [Southwest Idaho Eco-Group] forests, and a set of management themes cannot be built on inconsistent management directives from Forest Plans. Another unexplained aspect of the management theme formation and location is—How could management themes be selected and mapped before the purpose and need was defined? The management themes were created by the State of Idaho before scoping for the Idaho DEIS and before the Idaho DEIS purpose and need was drafted. The management themes were not crafted to address the Idaho DEIS purpose and need. (Organization, #1693.45.22310.600)

BECAUSE THE DEIS CONFLATES FOREST PLAN PRESCRIPTIONS WITH MANAGEMENT THEMES

There is a lack of adequate site-specific information. Why does the DEIS erroneously conflate forest plan prescriptions with the “themes” in the document? For example, Moose Mountain (A-3) [in] the Clearwater National Forest (CNF) currently does not allow logging. The so-called Primitive theme allows commercial logging just like the proposed so-called Backcountry/Restoration theme. Indeed, the language is identical (see DEIS pages 47–49). As such, A-3 areas in the CNF Plan, which are non-suitable for logging, are more like the Wild Land Recreation theme. Indeed, A-3 areas are dedicated to Wild Land Recreation settings. Another example is the Weitas Roadless Areas (Bighorn Weitas) on the CNF. The eastern 60 percent of this area is unsuitable for logging and road building (C-1 and C-6); yet it appears as Backcountry on the current map. Meadow Creek (part of the Roadless Area surrounding the Selway-Bitterroot Wilderness) on the Nez Perce National Forest (NPNF) is yet another example. There is nothing like General Forest in the plan for the vast majority of this area and indeed, nearly the entire area is removed from logging during the plan period. This list is not exhaustive, but it shows how the Agency has tried to deceive the public by wrongly placing many areas that have much more protection, both in the plan and under the 2001 Rule, than the Backcountry theme into the Backcountry theme as the existing situation. (Organization, #1800.22.31000.600)

3-26 Public Concern: The Forest Service should fully disclose and analyze the effects of potential development under the General Forest, Rangeland, and Grassland management theme.

We ask that the Forest Service thoroughly analyze and disclose the effects of potential development activities on lands proposed for “General Forest” in the Idaho Petition on wildlife habitat, ecosystem functions, water quality, tourism, recreation, hunting, fishing and solitude. (Individual, #3.8.33500.1)

There needs to be a full analysis of the 609,500 acres of the General Forest, Rangeland, and Grassland management theme, which is proposed for open-pit mining development. To proceed without this is undemocratic. (Individual, #226.3.31000.110)

**BECAUSE SPECIAL INTERESTS INFLUENCED THE DECISION
TO APPLY THIS DESIGNATION TO CERTAIN AREAS**

One only has to look at the proposed Idaho Roadless Rule (Alternative 3) to see how the process has been manipulated by Idaho special interests. Many of the lands suggested for transfer to this General Forest, Rangeland, and Grassland allocation occur on the Caribou National Forest and are rich in phosphate reserves. Mining interests have clearly selected these lands for placement into this zone so that they may avoid the restrictions of the 2001 Roadless Rule. Likewise, most of the existing Roadless Areas (5,245,100 acres) have been placed in the Backcountry/Restoration theme with the idea that these lands can somehow be “restored” by logging. This allocation was clearly included to appease the Idaho timber interest and provides no real documentation to support the contention that logging will actually reduce fire risk or establish any other form of restoration. These lands don’t need [to be] “restored” as they are already the most ecologically sound land areas in the United States. (Individual, #1482.4.20000.50)

3-27 Public Concern: The Forest Service should revisit the impacts of the General Forest management theme on big game herds along state boundaries.**BECAUSE HERDS IN MONTANA MAY BE AFFECTED BY THE PROPOSED IDAHO ROADLESS RULE**

We [Hellgate Hunters and Anglers] are concerned about proposed General Forest management guidelines in the draft Idaho Roadless Rule that could impact Roadless Areas along the border and create spill-over impacts on big game herds enjoyed by sportsmen in Montana Roadless Areas. (Organization, #1535.1.23600.560)

3-28 Public Concern: The Forest Service should revisit the impacts of the General Forest management theme on Yellowstone cutthroat trout.

BECAUSE YELLOWSTONE CUTTHROAT TROUT ARE FACING EXTIRPATION

The proposed Idaho Rule designates as “General Forest” huge sections of Inventoried Roadless Areas, thus opening them up to road building and logging. These activities further threaten forest inhabitants. In Eastern Idaho, of particular concern are the Yellowstone cutthroat trout populations that are already facing extirpation. (Organization, #1697.23.23600.260)

3-29 Public Concern: The Forest Service should disclose the specific rationale for assigning each Inventoried Roadless Area to the General Forest, Rangeland, and Grassland management theme.

**BECAUSE THIS WAS REQUESTED BY THE ROADLESS AREA
CONSERVATION NATIONAL ADVISORY COMMITTEE**

Specific rationale needed to place areas in General Forest: The December 19, 2006 letter to the Secretary of Agriculture from the RACNAC [Roadless Area Conservation National Advisory Committee] requested “specific rationale for assigning each individual Inventoried Roadless Area to the General Forest theme.” In our opinion, the DEIS does not fulfill this request. Instead, the DEIS and Appendix F reference the existing (or proposed) Forest Plans, but provide no specifics to the actual designations, guidelines, or differences between those plans and the proposed management direction of the General Forest theme. (Organization, #1817.18.31000.160)

3-30 Public Concern: The Forest Service should provide NEPA analysis for every Inventoried Roadless Area under the General Forest, Rangeland, and Grassland and the Backcountry/Restoration management themes.

BECAUSE THE SCOPE OF REASONABLY FORESEEABLE ACTIONS CALL FOR IT

The Proposed Rule does not prescribe nor does it specifically authorize any project within an IRA [Inventoried Roadless Area]. The United States Department of Agriculture (USDA) indicates that there is no change in the physical environment because the Proposed Rule is programmatic in nature. However, [because of] theme designation and the scope of reasonably foreseeable actions that will likely occur within IRAs under the [management] themes of General Forest, Rangeland, and Grassland (GFRG) or Backcountry/ Restoration (BCR), it is appropriate to request further NEPA analysis for every IRA containing GFRG or BCR, before a final decision is rendered. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.27.23100.131)

Role of the Implementation Commission

3-31 Public Concern: The Forest Service should address the role of the Idaho Roadless Rule Implementation Commission.

**BECAUSE THE COMMISSION MAY REPRESENT AN ILLEGAL DEVOLVING OF RESPONSIBILITY
FROM THE FEDERAL GOVERNMENT TO THE STATE LEVEL**

The legal authority of the special interest State of Idaho Roadless Rule Implementation Commission is not adequately addressed in the DEIS. This Rule confuses public land policy. The Federal government can't devolve its responsibility to the citizens to a state level without congressional approval. Even if the commission doesn't violate existing law, this commission should have been addressed in the DEIS and discussed in more detail. (Organization, #1800.185.31000.50)

Illegal Devolution of Authority States or state-appointed committees have no jurisdiction or right of jurisdiction over National Forests. Furthermore, governors were not elected by all of the citizens who own the National Forests. They were elected by a tiny subset of Americans. In any case, these governors

did not run on the issue of National Forest management, as it is not their responsibility. As such, the Idaho DEIS is baseless. It is contrary to National Forest policy and puts the National Forests in Idaho under a different policy with regard to Roadless Areas. We are one nation. Perhaps nowhere is the stupidity of this approach [more apparent than when] looking at state boundary issues. Several Roadless Areas cross state boundaries. Having a different set of management guidelines for these areas is foolish. In some instances, the same National Forest crosses the state boundaries and it would result in two separate management systems for the same Roadless Area on the same National Forest. (Organization, #1800.184.10110.620)

3-32 Public Concern: The Forest Service should clarify how the Idaho Roadless Rule Implementation Commission would be structured and would function.

TO ENSURE THAT ALL USER GROUPS AND VIEWPOINTS ARE REPRESENTED ON THE COMMISSION

Idaho Roadless Implementation Committee: It needs to be determined how the Idaho Roadless Implementation Committee (IC) will be structured and function. From our understanding, the IC will be set up similar to RACs [Resource Advisory Committees] that were established under the Secure Rural Schools and Community Self-Determination. It needs to be determined how many members will be on the IC and from what interest groups (e.g., local government, user groups and national environmental groups) and how decisions will be made and for what. Hunters and anglers are one of the biggest users of Idaho's roadless areas and deserve an equal place at the table on any state decisions affecting these areas, and should be adequately represented on the state roadless IC. (Organization, #1817.13.10430.55)

It is imperative that the final rule include commissioners as advisory, reviewing and supporting facilitators to ensure that issues and concerns outside the preservation community are also dealt with. This would provide some assurance that the locally affected rural communities have sufficient consideration in the role of implementing and executing proposals. Obviously, the commissioners should be from rural and urban settings to provide an adequate representation and range of viewpoints. (Government, #2364.3.10200.61)

3-33 Public Concern: The Forest Service should establish the Idaho Roadless Rule Implementation Commission as the body responsible for reviewing Roadless Area projects in the Backcountry/Restoration management theme.

We believe all Roadless Area projects located outside of a Community Protection Zone as defined by the Healthy Forest Restoration Act and within the Backcountry/Restoration Category should be filtered through the State Roadless Implementation Committee before moving forward. All projects in the Primitive category should also be developed through the IC [Idaho Roadless Implementation Committee]. (Organization, #1817.13.10430.55)

3-34 Public Concern: The Forest Service should establish the Idaho Roadless Rule Implementation Commission as the body responsible for developing Roadless Area habitat projects in the Backcountry/Restoration and Primitive management themes.

All Roadless Area habitat projects located outside the Community Protection Zone that are implemented under the Backcountry/Restoration category should be developed through the State Roadless Implementation Committee. All habitat projects in the Primitive category should also be approved and developed by the Implementation Committee. (Recreation/Conservation Organization, #1817.12.10100.1)

Environmental Consequences Analysis

3-35 Public Concern: The Forest Service should provide an analysis of significant impacts.

TO COMPLY WITH THE DEFINITION OF “SIGNIFICANT” IN THE CODE OF FEDERAL REGULATIONS

The lack of “significant” adverse impacts in this DEIS is based on the premise that this is a policy EIS and actual impacts will not occur until later with specific proposed actions. This premise is inconsistent with the definition of the word “significant” in the Code of Federal Regulations (CFRs). The definition of “significant” as defined in 40 CFR 1508.27 includes unique characteristics of the geographic area such as proximity to wetlands, wild and scenic rivers, or ecologically critical areas. It includes the degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration. 40 CFR 1508.27 also states that significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. The subject DEIS: 1. Includes an area that has unique characteristics; 2. Will establish a precedent for future actions with significant effects; 3. Will result in a decision in principle about a future consideration; and 4. It is reasonable to anticipate a cumulatively significant impact on the environment from activities precipitated from the proposed action. (Individual, #749.2.32000.2)

3-36 Public Concern: The Forest Service should analyze the maximum and predicted impacts associated with the alternatives.

BECAUSE THE IDAHO ROADLESS RULE WILL RESULT IN DIRECT IMPACTS

The statement that this Rule will have no impacts because it does not authorize specific ground-breaking activities is illogical because this larger planning process will inevitably lead to an irretrievable commitment of Agency resources that will lead directly to impacts on the ground. The USFS should analyze the maximum and predicted impacts associated with the allowed activities under the alternatives. (Recreation/Conservation Organization, Boise, ID - #1721.7.31000.160)

3-37 Public Concern: The Forest Service should address all relevant concerns.

BECAUSE MANY CONCERNS ARE NOT ADDRESSED

The DEIS omits or inadequately addresses the following: Phosphate development; Oil and gas leasing; Land exchanges (i.e., Will roadless areas be precluded from future land exchanges?); Ski area expansion; Fire management; Full vegetation analysis; Hard rock mining; Wildlife management (i.e., helicopter landings within various themes and recommended Wilderness Areas); Development of new and/or reconstructed off-highway vehicle trails; How existing Forest Plan restrictions will be carried forward in the DEIS and draft Rule; Fire risk effects associated with roads; Authority of State Task Force/Commission; Discussion of Special Area management; Specific discussion/rationale with regard to each roadless area in the General Forest theme; Rare resources (i.e., plants, wildlife, forest types, etc.) that may be impacted by global climate change; [and] Implementation of existing Forest Plans (e.g., changing the recommended Wilderness classification to Wild Land Recreation) (Organization, #1800.21.31000.2)

3-38 Public Concern: The Forest Service should use fair and unbiased evaluations.

TO AVOID CAPRICIOUSLY CONSIDERING NATURALLY CAUSED IMPACTS AS LESS SIGNIFICANT THAN HUMAN-CAUSED IMPACTS

In a fair and unbiased evaluation, the source of the impacts (natural versus human caused) should not be a factor. In a fair and unbiased evaluation, relative impacts associated with natural events—including floods and wildfires—are thousands of times greater than impacts associated with timber harvests and OHV [off-highway vehicle] recreation, yet proposed actions involving timber harvests and OHV recreation are considered to have unacceptable impacts. The absence of rational connection between the

facts found and the choice made has been defined by the courts as arbitrary and capricious (Natural Resources. V. U.S., 966 F.2d 1292, 97 (9th Cir. 1992)]. A clear error of judgment; an action not based upon consideration of relevant factors and so is arbitrary, capricious, an abuse of discretion or otherwise not in accordance with law or if it was taken without observance of procedure required by law (5 USC 706(2)(A)(1988)). We [Capital Trail Vehicle Association] request fair and unbiased evaluations and judgments during this evaluation and decision-making. (Motorized Recreation, Helena, MT - #168.230.10440.200)

3-39 Public Concern: The Forest Service should use current data in impact analyses.

BECAUSE THE FIRE HISTORY DATA ARE NOT CURRENT

The Idaho DEIS Chapter 3.3 and the Fuel Management and Fire Suppression Specialist Report (Fuel Report) do not use current data on fire history or on recent fire effects. The Fuel Report makes reference to the 2000 Fuel and Fire Report, Large Wildland Fire but this 2000 report does not include current data on Idaho fires and fuels. The 2003, 2006, and 2007 fire seasons in Idaho included significant acreage in fire; and the data would change the calculations described in multiple tables in the Fuel Report, particularly on Fire Condition Class, Tables 7, 9, and 11. (Organization, #1693.23.31000.262)

This document has very outdated fire information. The public should be informed as to how many acres have burned since 2000 in addition to the years before. The Forest Management Plans should be updated to show how much more often these areas are burning with the current management plans in place. The Chimney Rock IRA [Inventoried Roadless Area] supposedly burns once every 150–300 years. Portions of this IRA have burned twice since 2000. The reburned portions burned even more intensely in 2007 than in 2000. Standing snags were reduced to ash. This area will continue to burn with high frequency as long as it is not managed. Fire frequencies should be recalculated with the wildland fire management directive in mind. How often will these areas burn if nothing is done to stop or contain fires with the current fuel conditions? The fire management prescription for the IRAs needs to [be] reevaluated or we will soon be able to rename these Inventoried Grasslands. The fire frequency estimates in the existing [Forest] Plans need to be revisited taking [into account] global warming and the condition of the areas with no management over the last 44 years. (Individual, #1825.70.31000.260)

The 2006 and 2007 fires in areas #912 (map #33), #913 (map #124), #925 (map #86), #010 (map #189), and #035 (map #27) are not referred to. These fires destroyed much of the land. The 2008 runoff will also cause much destruction to this area's watershed. The process of the DEIS for this land is negated by the past two years of "use fires." There needs to be a reevaluation of this plan and the National Forest System lands in Idaho [to] reflect the most recent conditions. (Individual, #635.6.31000.260)

3-40 Public Concern: The Forest Service should more realistically identify the impacts of the proposed Idaho Roadless Rule.

BECAUSE THE DEIS FAILS TO ASSESS THE ENVIRONMENTAL CONSEQUENCES OF ITS IMPLEMENTATION

The DEIS does a good job of describing the types of potential adverse impacts associated with development of the Idaho Roadless Areas to aquatic species such as salmon, steelhead, and bull trout. However, it fails miserably in its actual assessment of environmental consequences of implementing the IRR [Idaho Roadless Rule]. The effects of phosphate mining are relegated to some uncertain, future analysis. Your contention that no adverse environmental effects on aquatic animal species or their habitats would be expected under the IRR because it would not directly authorize any ground-disturbing activities is both laughable and deceptively dishonest. This is clearly a "bait and switch" strategy. Your summary of impacts to aquatic species upon implementation of the IRR is not scientifically credible. It is based on convenient opinion, generic prescriptions, discretionary loopholes, low-ball estimates of future budgets and potential development, and abbreviated planning horizons. One of the few trustworthy statements made in this section was in reference to the 2001 Rule: "Overall, the effects on

fish habitat and fish species would be beneficial because of the limited amount of disturbance permitted in roadless areas.” (Individual, #268.61.31000.720)

BECAUSE LOW-BALL BUDGET ASSUMPTIONS DOWNPLAY IMPACTS

Your mantra that road construction/reconstruction likely would not see an increase in the foreseeable future (next 15 years) because the appropriated road budget is flat or declining, and there is no indication this trend will change, is a thinly-veiled attempt to downplay the adverse effects of the IRR [Idaho Roadless Rule]. As stated above, one could not rationally expect substantial increases in road budgets under the 2001 Rule and constraints imposed by public litigation. With the change in allocation (IRR) and the “right” administration, road budgets could increase far above your “low-ball” projections. (Individual, #268.51.14000.720)

TO ENSURE A MORE HONEST AND ACCURATE ASSESSMENT

Your tabular summary of impacts, effects, and results due to implementation of the IRR [Idaho Roadless Rule] is exceptionally ludicrous. Here are a few examples: - There will be a negligible effect of building roads for timber harvest on highly sensitive soils (235,200 acres). - Likely effect (nicely understated) of building roads on high hazard soils for mining. - Possible mining effects to [Section] 303 (d) streams from selenium. Don’t worry—Idaho will mitigate the poisoning of your drinking water. - Limited potential risk of adverse effects to aquatic species or habitat in the backcountry. - Some potential risk (nicely understated) to aquatic species or habitat in the GFRG [General Forest, Rangeland, and Grassland]. - Some potential risk to terrestrial species or habitat in the GFRG. - No change in fishing and hunting opportunities. - Local community interests integrated with national values. To be more honest and accurate, this last one should be changed to “local Republican interests integrated with national Republican values.” (Individual, #268.35.31000.720)

TO BETTER ASSESS THE STATUS OF IDAHO’S REMAINING LARGE WILDLANDS

Roadless Areas represent a scarce national resource. The DEIS does not adequately assess the unique nature of Idaho’s status as still having large wildlands—wildlands that will inevitably and permanently be degraded if the IRAs [Inventoried Roadless Areas] that are a major component of them are allowed to be developed. (Organization, #1824.20.31000.200)

3-41 Public Concern: The Forest Service should disclose and evaluate the impacts of weakening existing Forest Plan management standards.

In memos analyzing the consistency between the proposed Idaho Rule and existing plans, both the Payette and Boise have submitted briefing papers to the Idaho Roadless Rule ID Team which cumulatively identified over 500,000 acres that the proposed Idaho Rule “places in a less restrictive management category than reflected in the Forest Plan.” At a minimum, the F[inal] EIS must disclose and evaluate the impacts of weakening existing Forest Plan management standards on the natural and human environment. (Preservation/Conservation, Boise, ID - #4156.144.31000.160)

3-42 Public Concern: The Forest Service should analyze the effects of extractive industries on water supply, habitats, and recreation.

I write to ask that you fully consider the impacts of logging, road construction, mining, and other industrial development in Roadless Areas. Such activities will have irreversible impacts on the clean drinking water they supply, the vital habitat they provide for fish and wildlife, and the countless recreational opportunities that exist on these unspoiled wild areas in Idaho. It is important that these backcountry areas in our national forests are protected. (Individual, #1.2.40000.2)

3-43 Public Concern: The Forest Service should analyze the effects of oil and gas leasing and development, road construction and phosphate mining, and road construction and timber harvest.

The analysis of the potential impacts on these and other public resources should include, but not be limited to, the following threats from oil and gas leasing and development; road construction and phosphate mining; road construction and logging. (Individual, #3.7.31000.1)

3-44 Public Concern: The Forest Service should include an analysis of the impacts of opening up areas to development of roads, timber harvest, and mining.**TO COMPLY WITH NEPA**

The subject Draft EIS does not meet either the intent or the requirements of the National Environmental Policy Act (NEPA). The NEPA process is meant to aid Federal agencies in decision-making. This DEIS is written as if the “decision” to proceed forward with the proposed action has already been made. There are no negative impacts described from the proposed action, no studies conducted, no new analysis performed. That said, this EIS would establish the policy that would open up over 5.8 million acres to the development of roads, logging, and mining. This is over 60 percent of the current Roadless Area in the State of Idaho. The 5.8 million acres includes unique habitat to elk, deer, grizzly, moose, birds, [and] aquatic and other species, including threatened and endangered species. (Individual, #749.1.32000.720)

3-45 Public Concern: The Forest Service should project impacts based on robust development.**BECAUSE PRECAUTIONARY AND CONSERVATIVE ASSUMPTIONS OFFER BETTER PROTECTION**

Projected impacts on Roadless Areas should be premised on robust rather than anemic Federal spending projections. The DEIS and IRR [Idaho Roadless Rule] typically state that the actual impacts of the IRR will be much lower than the potential impacts. For example: Shifts in the number of Roadless Area acres assigned to more permissive management themes can increase the potential for adverse effects to roadless characteristics. However, reasonably foreseeable effects in the next 15 years are likely to be limited by levels of road construction/reconstruction, timber cutting, and leasable minerals activity actually projected to occur during that time. [Footnote 9: Id. at 1143, 73 Fed. Reg. At 1143] Given that Roadless Areas cannot be regenerated subsequent to road construction, Outdoor Alliance feels that precautionary and conservative assumptions (as in assuming the upper end of development, not the lower) should be used in projecting the impact of the proposed IRR. Budgets (and priorities within the same) regularly change from year to year due to political leadership and public priorities. As such, management of these areas could certainly change. Assumptions tied to budget constraints provide no reliable protection for Roadless Areas. Likewise, assurances of limited impacts of the IRR due to the 15-year window for implementation referenced throughout the DEIS and IRR provide little assurance that as times passes, Roadless Areas in Idaho will not gradually decrease in size or number. (Organization, #1821.21.31000.800)

3-46 Public Concern: The Forest Service should quantify the effects of residential encroachment on wildlife habitat.**TO ALLOW A COMPARISON TO THE IMPACT FROM MOTORIZED RECREATIONISTS**

The encroachment of residences into the forest is often the most significant factor contributing to the loss of summer and/or winter wildlife habitat. We [Capital Trail Vehicle Association] request that the impact of these permanent encroachments be quantified and compared to the relatively minor impact that mechanized forest visitors have on wildlife habitat. (Motorized Recreation, Helena, MT - #168.266.41100.530)

3-47 Public Concern: The Forest Service should analyze potential future Alaska National Interest Lands Conservation Act claims.**BECAUSE THEY ARE A REASONABLY FORESEEABLE ACTION**

Following the implementation of the 2001 Roadless Rule, the State of Alaska sued the Forest Service, arguing that the 2001 Roadless Rule violated ANILCA [Alaska National Interest Lands Conservation Act]. Their legal strategy relied on an extremely wide interpretation of the “no more” clause of ANILCA (Section 101[d]), which stated that ANILCA strikes a reasonable balance between development and preservation, and that no additional protections were warranted. The 2001 Roadless Rule FEIS had

already clarified that Roadless Areas are not conservation system units as defined by ANILCA (Roadless Rule FEIS, Vol. 3 (Response to Public Comments), p. 191). The Bush administration proceeded to settle with the State of Alaska over this matter, which allowed development otherwise precluded by the 2001 Roadless Rule.

The Idaho Roadless Rule DEIS makes no mention of ANILCA. Because ANILCA claims are reasonably foreseeable action that could directly impact Idaho Roadless Areas, the FEIS must disclose these activities and take them into consideration in terms of cumulative effects to roadless values. Because of the Idaho Rule's subservience to statutory regulation and preexisting rights, we [Idaho Conservation League] understand that reconsideration of, or amendment to, ANILCA is beyond the scope of this proposal. At the same time, because the Idaho Rule would impact Idaho Roadless Areas, and because ANILCA would impact Idaho Roadless Areas, the cumulative impacts of these reasonably foreseeable actions must be duly considered in the FEIS. Specifically, the FEIS should disclose the nature of private ownership within Idaho Roadless Areas, the potential for land exchanges to affect these areas, past claims and likelihood of future ANILCA claims, and effects to Idaho Roadless Areas. (Preservation/Conservation, Boise, ID - #4156.116.20000.180)

3-48 Public Concern: The Forest Service should compare the effects on Wilderness characteristics and potential designations between the 2001 Rule and the Idaho Roadless Rule.

The 2001 final Roadless Rule stated, "Adoption of this final rule ensures that inventoried roadless areas will be managed in a manner that sustains their values now and for future generations." (p. 3247) Through full retention of roadless values, the 2001 Rule also retained the current Wilderness values and characteristics for all Roadless Areas. The Idaho DEIS contains no chart, table, or mapping of its effect on Wilderness characteristics and potential future Wilderness designations. A comparison of effects on Wilderness characteristics and potential future Wilderness designations must be included in the Idaho FEIS. (Organization, #1693.51.31000.650)

3-49 Public Concern: The Forest Service should revise their analysis.

**TO CORRECT BIAS RESULTING FROM THE INACCURATE EQUATING OF THE BACKCOUNTRY/
RESTORATION THEME WITH THE PROTECTIONS OF THE 2001 RULE**

On page 1142, the preamble states, "Management direction under the 2001 rule is most similar to the backcountry/restoration theme under the proposed rule." We [Idaho Conservation League] respectfully disagree. The allowance for temporary and permanent roads, logging for indeterminate "forest health" logging and new and expanded mining activities depart significantly from the existing direction from the 2001 Rule. As a result of this inaccurate statement, the preamble, as well as presentations given at public hearings throughout Idaho and in DC misled the public as to the impact of the proposal. In addition, where the DEIS compares alternatives, this assumption skews the analysis. (Preservation/Conservation, Boise, ID - #4156.10.20000.720)

Projections of Development

3-50 Public Concern: The Forest Service should reconsider the projections for minerals activity, road construction, and timber harvest.

**BECAUSE THE PROJECTIONS ARE UNDERESTIMATED AND
THEREFORE COMPROMISE THE EFFECTS ANALYSIS**

On page 1143, the preamble states, "Foreseeable effects in the next 15 years are likely to be limited by levels of road construction/reconstruction, timber cutting and leasable minerals activity actually projected to occur during that time." This statement raises a critical issue, that the projections associated with development are directly related to the consideration of effects. If the projections are not accurate, the effects analysis will fail to evaluate the full range of impacts from the proposal. As a result of our analysis of the projections, we [Idaho Conservation League] feel that with regards to logging, roads, and minerals, that the projections are significantly underestimated. As a result, the effects analysis fails to

consider the reasonably foreseeable impacts of the proposal. (Preservation/Conservation, Boise, ID - #4156.15.21000.200)

BECAUSE THE PROJECTIONS ARE BASED ON FAULTY ASSUMPTIONS

Your projections for timber harvest and road construction in Roadless Areas under the IRR [Idaho Roadless Rule] are incredulous. Some of your critical assumptions are not valid. If budgets are going to remain flat in the near future, why bother with this expensive process to change the roadless allocation when the possibility of obtaining funds for implementation is so bleak. Budgets change annually and could increase under a different administration or change in management emphasis. Republican administrations have never been shy about subsidizing extractive industries. Why would you expect to receive robust funding for roadless development under the 2001 Rule or uncertainty associated with Forest Plan litigation? Your contention that the volume of timber harvested between 2001 and 2006, and projected to be harvested between 2007 and 2011 provides a representative basis for estimating the amount of trees to be cut under IRR is unbelievable. If you are successful at eliminating 2001 Rule and changing the allocation, one could reasonably expect that timber harvest and road construction would accelerate both in the near and long term. If not, then why spend the taxpayer's money on a trivial process. It is well known that many Idaho forests have detailed timber and roading plans for the Roadless Areas. It would not take extravagant budgets to implement them. The critical limiting factors have been the allocation under the 2001 Rule and the specter of litigation. Adoption of the IRR would eliminate the allocation barrier. (Recreation/Conservation Organization, Boise, ID - #1723.37.20000.800)

Phosphate Mining

3-51 Public Concern: The Forest Service should use recent selenium research data in the impact analyses.

The DEIS does acknowledge that there is a "concern" about the effects of selenium contamination resulting from phosphate mining. It then attempts to downplay its importance, giving only a brief statement about the effects of selenium contamination on fish, but then entirely fails to discuss the effects of selenium contamination on fish populations resulting from phosphate mining. The entire discussion in the DEIS follows: "Of particular concern to aquatic resources in Idaho is selenium contamination resulting from phosphate mining. Selenium contamination has occurred worldwide in association with common and economically important activities such as fossil fuel processing, mining, and irrigation, resulting in dozens of cases in which fish and wildlife populations have been affected (Van Kirk and Hill 2006). The southeast Idaho phosphate mining region, which includes the Caribou National Forest, is one of the most extensive and productive phosphate fields in the world (Jasinski et al. 2004). The bioaccumulative nature of selenium in aquatic systems is well documented (Presser et al. 1994, Dobbs et al. 1996, Maier et al. 1998, Garcia-Hernandez et al. 2000, Hamilton 2002). Documented individual-level effects of selenium in fish include decreased egg incubation period, hatch rate, pre-swim-up fry survival, post-swim-up fry survival, juvenile winter survival, juvenile growth, adult survival, and adult growth (Van Kirk and Hill 2006). Modeling results from Van Kirk and Hill (2006) concluded that decreased juvenile survival in cutthroat trout due to selenium toxicity could result in decreased population size." [Footnote 34: DEIS at 192].

Recent research indicates that selenium concentrations in the Blackfoot River and Salt River watersheds are high enough to cause observable declines in cutthroat trout populations in some streams. [Footnote 35: Van Kirk, R. W. and S. L. Hill. 2007. Demographic model predicts trout population response to selenium based on individual-level toxicity. *Ecological Modelling* 206: 407-420]. Dr. Van Kirk's research noted that phosphate mining and its accompanying releases of selenium in the Salt and Blackfoot watersheds put Yellowstone cutthroat populations at risk. Although the DEIS notes the research by Van Kirk and Hill, it fails to accurately describe the effects on native trout from phosphate mining that are likely to result from the Idaho Rule. It also fails to properly cite the Van Kirk and Hill research, noting that it is unpublished. That is incorrect. The correct citation is Van Kirk, R. W. and S. L. Hill. 2007. Demographic model predicts trout population response to selenium based on individual-level toxicity. *Ecological Modelling* 206: 407-420. Their research was published in that peer-reviewed journal in April 2007. (Organization, #1649.41-42.31000.352)

3-52 Public Concern: The Forest Service should more realistically identify the mining impacts of the proposed Idaho Roadless Rule.

TO BETTER ASSESS THE IMPACTS OF MINING ON NATIVE FISH

A direct outcome of the DEIS failure to disclose and discuss the effects of phosphate mine-induced selenium contamination of nearly 120 miles of Idaho streams is the impact to two other of Idaho's unique resources, Yellowstone and Bonneville cutthroat trout. By failing to adequately assess the negative impacts from selenium to streams in southeast Idaho, the DEIS could not, and did not adequately disclose the impacts to one of Idaho's native trout. (Organization, #1649.38.31000.355)

TO BETTER ASSESS THE IMPACTS OF MINING ON FISH AND WILDLIFE

The DEIS analysis states that phosphate mining can be very hazardous to fish. It is irresponsible to abandon a huge block of roadless land in the Caribou/Targhee to the phosphate industry for development. Not only will this put our wild trout populations in jeopardy, but also it could destroy some of the best mule deer and elk hunting in Idaho. 545 million tons of phosphate would be made available from mining on nearly 8,000 roadless acres and opening up an additional 12,000 acres of unleased areas on roadless acres previously off limits. Over half a million additional roadless acres would be made available for mining. 235,200 acres of roadless areas with highly sensitive soil will be opened to road construction for mining. Idaho's environmental and economic future will be better served by maintaining current protection for roadless lands. These lands are critical to Idaho's national reputation as a recreation venue with quality recreation, clean water, fish, and wildlife habitat. Idaho's undeveloped Roadless Areas provide the best fishing and hunting opportunities, and generate millions of dollars per year for Idaho's economy. (Individual, #1472.5.44210.870)

The Forest Services' inadequate disclosure of selenium contamination that will be abetted by the proposed Idaho Rule is the effects that current selenium contamination has on water-dependent wildlife species such as water birds, aquatic mammals, and amphibians. As early as 1999, Dr. Joseph Skorupa of the USFWS [U.S. Fish and Wildlife Service] had documented the negative effects to water-dependent wildlife species in southeast Idaho resulting from selenium contamination of water and forage caused by phosphate mining. [Footnote 37 Skorupa et al. August 2002. Reconnaissance Survey of Selenium in Water and Avian Eggs at Selected Sites within the Phosphate Mining Region near Soda Springs, Idaho—May–June 1999]. The report prepared by Dr. Skorupa and his fellow researchers noted that the hottest sampling sites they discovered during their survey in southeast Idaho's phosphoria region were hotter than the hottest sampling sites discovered during approximately a decade of sampling across ten states for the National Irrigation Water Quality Program. During the 1999 survey, they had no difficulty finding birds nesting at very contaminated wetlands, ponds, reservoirs, etc. The eggs of those birds had very high selenium concentrations; 77 percent of 74 samples had selenium levels above 10 ppm [parts per million], which is approximately the toxicity threshold for mallard ducks. The researchers spent a very limited time in the field, yet they discovered an American coot egg with more selenium (80 ppm) in it than has ever been documented for anywhere else in the U.S., even though American coots have been extensively sampled for many years in at least ten western states, at places identified as the worst selenium sites in those states. [Footnote 38: Ibid. at 79].

Skorupa et al. also discovered aquatic invertebrates with the highest selenium concentrations (788 ppm) ever reported from much more intensive and extensive sampling across the western U. S. [Footnote 39: Ibid.] This included the discovery of a significant salamander die-off of more than 250 individual animals, which has subsequently diagnosed as selenium toxicosis. The 120 ppm Se [selenium] in the salamander tails reported by that lab was a record for selenium concentrations in any salamander tissue. [Footnote 40: Skorupa et al.]. They also found dead white pelicans and dead beaver from the shore of a reservoir, where they located and collected a deformed coot embryo, that were not the result of predation and whose cause of death was suspected to be selenium, but could not be determined. In summary, Dr. Skorupa noted that the "Idaho phosphoria region presents the potential for ecotoxicological risks to breeding water birds that equals or exceeds any region and source of selenium previously reported in the scientific literature. [Footnote 41: Ibid. at 79] Dr. Steven J. Hamilton discussed several other documented cases of wildlife deaths from selenium in his December 16, 2007 comments on the Smoky Canyon Mine Panels F and G Expansion FEIS. [Footnote 42: Exhibit 1, Appendix B]. His discussion

included additional salamander die-offs subsequent to those that Dr. Skorupa reported, at the same location in 1999 (as noted above). He also provided documentation of other salamander die-offs at other sites by a different researcher in 2000 [Footnote 43: Ibid]. (Organization, #1649.45–46.44210.352)

TO BETTER ASSESS THE IMPACTS OF MINING ON FISH, WILDLIFE, AND HUMANS

Following are some, but not all, of the known effects from phosphate mining on the Caribou-Targhee National Forest. Yet the DEIS fails to give more than a brief and superficial mention of the impacts from phosphate mining-related selenium contamination, and fails wholly to provide a thorough analysis of this issue, or to properly disclose the effects on the environment that will result from the proposed Idaho Rule. In an Environmental Impact Statement prepared in 1982 for Simplot's Smoky Canyon Mine, the impact of selenium is documented as a clear risk of mining on the surrounding environment. [Footnote 14: 14 Smokey Canyon Phosphate Mine Final Environmental Impact Statement March 1982. pgs. 2-22, 2-23 JR Simplot Co., Caribou County, Idaho]. Selenium pollution from mining is contaminating the Salt and Blackfoot Rivers from three operating phosphate mines and more than thirty closed mines. [Footnote 15: Idaho Department of Environmental Quality, Area Wide Human Health and Ecological Risk Assessment, 2002. See also, USEPA Notice of Violation, P4 Production South Rasmussen Ridge Mine, September 6, 2007]. Selenium contamination from seventeen mine sites, including all three active mines, poses such immediate and severe threats that they have been determined to be "Superfund" sites by the U.S. Environmental Protection Agency. [Footnote 16: USEPA, USDA, IDEQ, USFS, USDO, BLM, USFWS, BIA Area-Wide Investigation of Contamination from Phosphate Mining in Southeastern Idaho, Consent Order/Administrative Order on Consent, 2003. See also <http://cfpub.Epa.gov/supercpad/cursites/copinfo.cfm?id~1002245>.]

The history of a connection between selenium and phosphate mining is well documented. Any denial by the mining companies is an attempt to evade their responsibility to clean up the very harmful problem they have created. [Footnote 17: Edgar Imhoff Environmental Contamination from Selenium in Southeast Idaho: Who Knew What, and When Did They Know It. September 2007]. Once released to our land and water, toxic levels of selenium persist for hundreds of years, threatening the health and prosperity of future generations. Selenium bio-accumulates—it builds up in the food chain with increasing concentrations in plants, fish, and animals—including trout, deer, and elk that are eaten by local hunters and anglers and their families. [Footnote 18: A Dennis Lemly, Ph.D., US. Department of Agriculture, Forest Service, Southern Research Station, Fisheries Research Unit, February 21, 2006 letter "RE: Draft Environmental Impact Statement for Smoky Canyon Mine Expansion Proposal" "To: Smoky Canyon Mine DEIS, c/o The Shipley Group, P.O. Box 2000, Bountiful, Utah 84011-2000. See also Comments of Steven J Hamilton, Ph.D., on Smoky Canyon Mine, Panels F & G, Draft Environmental Impact Statement prepared by US. Department of the Interior, Bureau of Land Management, Idaho Falls District, Pocatello Field Office (lead agency) and US. Forest Service and Idaho Department of Environment Quality, March 15, 2006.]

In 2002, the Idaho Department of Health and Welfare began posting warnings in the upper Blackfoot River basin. These warnings cautioned against children eating fish caught in the stream due to elevated levels of selenium leaking from the nearby North Maybe Canyon phosphate mine [Footnote 19: Idaho Department of Health and Welfare, Fish Consumption Advisory for East Mill Creek, January 2002]. In 2006, the Idaho Department of Health and Welfare warned hunters not to eat livers from elk harvested near any of the phosphate mines. A recent peer-reviewed and published study by scientists at Idaho State University shows that remaining Yellowstone cutthroat trout populations face a high risk of decline due to selenium contamination caused by phosphate mining. The highest levels of selenium pollution ever recorded in birds and eggs were found in Caribou Country, along with massive salamander die-offs. Since 1997, it has been documented that more than 600 hundred sheep have died from ingesting selenium-contaminated forage or water near phosphate mines. Although phosphate companies have been mining phosphate on public lands in Idaho for a century, making billions of dollars, they have never successfully cleaned up a single site. The Forest Service estimates it will cost hundreds of millions of dollars to permanently clean up the phosphate mess. (Recreation/Conservation Organization, Idaho Falls, ID - #1649.23-25.31000.423)

In 2002, the Idaho Department of Health and Welfare issued a fish consumption advisory for parents to limit the amount of fish they eat from Mill Creek, a stream so contaminated by phosphate mining-

induced selenium pollution that fish in the stream had significantly elevated concentrations of selenium in their flesh. [Footnote 49: <http://www.healthandwelfare.idaho.gov/DesktopModules/DocumentsSortable/DocumentsSrtView.aspx?tabID~O&ItemID~9944&Mid~10724&wverson~Staging>]. In the summer of 2006, [Footnote 50: Idaho Department of Health and Welfare, Agency for Toxic Substances, and Disease Registry and Bureau of Community and Environmental Health, Division of Health, Evaluation of Selenium in Elk in the Southeast Idaho Phosphate Resource Area. July 2006.] before the beginning of the big game hunting season, the Idaho Department of Health and Welfare issued hunters a reminder “. . . to limit consumption of elk liver of animals harvested near phosphate mines.” [Footnote 51: Idaho Department of Health and Welfare, News Release, October 17, 2006.] The DEIS for the proposed Idaho Rule failed to disclose this critical information, or how the implementation of the Rule might further affect human health issues related to future selenium releases caused by phosphate mining that would expand into Idaho’s roadless lands permitted by the Rule. (Organization, #1649.52.31000.790)

TO BETTER ASSESS THE ECONOMIC IMPACTS OF MINING

We are told that if the exemptions for phosphate mining are not made in the Backcountry/Restoration land management class, and that thousands of acres of currently protected roadless lands are not thrown open to development, in this case development of more and larger phosphate mines, then” . . . the Proposed Action could affect economic factors including timber outputs, energy and non-energy minerals, forest-dependent communities, and recreation special uses. [Footnote 52: DEIS, at 38] Natural resource extraction occupations are not among the leading occupations projected to grow in the next decade at the national, regional, or state level. Even the DEIS admits as much, noting “Wood products manufacturing, mining, and road construction each contributes less than 1 percent of total output, employment, labor income, and value added in Southeast Idaho. [Footnote 53: Ibid. at 288.] In fact, economic growth is projected to be strongest in the Services and Professional sector. On the other hand, the DEIS implies a rosy picture for the future of phosphate mining. [Footnote 54: Exhibit 1 Appendix A. Phosphate production from National Forest Service lands has increased since the mid-1980s, both in total quantity and as a proportion of domestic production. Western production will remain important for providing raw material for fertilizer in the western region and for production of elemental phosphorous (Jasinski 1999). Most western National Forest Service production occurs on the Caribou portion of the Caribou-Targhee National Forest, accounting for about 15 percent of domestic production in 2001(USDA Forest Service 2003). [Footnote 55: DEIS at 283.]

The reality is somewhat different than that which is presented in the DEIS. For example, the DEIS fails to disclose that the United States contains a relatively small portion (seven percent) of global phosphate ore reserves. [Footnote 56: US. Geological Survey (USGS). 2006. Mineral Commodity Summaries. Washington, DC: US. Department of the Interior (pp. 124–125)] Phosphate mining is a global industry that is not dependent upon the limited reserves in special places like the roadless areas of the Caribou-Targhee National Forest. Furthermore, the above quoted passage is misleading in its characterization of the importance of phosphate mining from Forest Service lands. In truth, the 15 percent figure accounts for all phosphate mined in the western US, including the significant production from J. R. Simplot’s phosphate mine in Utah. [Footnote 57: USGS Minerals Information, Phosphate Rock Statistics and Information, website—last visited March 24, 2008. [http://minerals.usgs.gov/minerals/pubs/commodity/phosphate_rock/mcs-2008-phosp.pdf]. Simplot’s Utah mine produces approximately twice the phosphate rock as its Smoky Canyon Mine in Idaho produces [Footnote 58: Alkire, Carolyn. Unpublished manuscript, citing Baker, Paul. 2007. Personal Communication. State of Utah, Division of Oil, Gas and Mining. January 5.], and the Smoky Canyon Mine is the largest Idaho producer of phosphate rock. The 15 percent figure also includes phosphate rock production from one of the other three mines operating in Idaho, Monsanto’s South Rasmussen Ridge Mine, which operates on State and private lands and not on Forest Service lands. In reality, phosphate rock produced from Forest Service lands in Idaho is considerably less than “15 percent of domestic production”; more accurately, the percentage is closer to 8 or 9 percent. (Organization, #1649.54–55.32000.423)

3-53 Public Concern: The Forest Service should include an analysis of phosphate mining.

TO COMPLY WITH THE “HARD LOOK” REQUIREMENTS OF NEPA

There is little analysis of the effects of phosphate mining in the DEIS. The DEIS contains approximately four pages of text that addresses phosphate mining, and over half of that paltry discussion is recited twice, verbatim, in two sections of the document. This paltry discussion of what is arguably the worst of the impacts that will result from the Idaho Rule fails NEPA’s requirement that the Forest Service take a “hard look” at the effects of phosphate mining. (Organization, #1649.21.32000.423)

Given that this information [research of selenium poisoning inadequate species] is well known and was available to the drafters of the DEIS, there is no excuse for having failed to disclose it and discuss the effects to wildlife from selenium releases from phosphate mining activities that occurred in the past, that continue to occur now, and will be exacerbated by future phosphate mining, mining that will occur as a result of the decision based on the NEPA analysis for the proposed Idaho Rule. Having failed to provide this information to the public and the decision maker and having failed to take a “hard look” at the effects of the proposed Idaho Rule is a violation of NEPA. (Organization, #1649.47.32000.423)

The toxic effects of selenium to livestock in the phosphate-mining region of southeast Idaho have been well documented over the past twelve years in at least six separate incidents. Acute toxicity, which involves the rapid onset of a severe effect following exposure to a relatively high concentration of toxicant over a short period time, occurred in four herds of sheep that died within hours or days of consuming high concentrations of selenium. In October 1997, approximately 135 sheep died from consuming selenium-contaminated forage at Simplot’s Conda Mine. [Footnote 44: 1997 Bureau of Land Management video in possession of GYC (Greater Yellowstone Coalition)]. In September 1999, another 60 or so sheep died after grazing on selenium-contaminated forage or drinking from spring water near the Wooley Valley mine site. [Footnote 45: Caribou County Sun, November 11, 1999; Idaho State Journal, November 12, 1999]. In June 2001, approximately 160 sheep died after drinking spring water located down gradient of the Conda mine site. [Footnote 46: Idaho State Journal, June 6, 2001]. And in May 2003, 327 ewes and lambs died after grazing at the reclaimed overburden dump site at the Conda mine site. [Footnote 47: Caribou County Sun, June 19, 2003]. Chronic selenium toxicity, which involves the delayed onset of symptoms following exposure to relatively low concentrations over an extended period of time, was confirmed in six horses in 1996 and two horses . . . [Footnote 48: Montgomery Watson (MW). February 1998. Fall 1997 interim surface water survey report, Southeast Idaho Phosphate Resource Area Selenium Project. Prepared for the Idaho Mining Association Selenium Committee]. The symptoms in six of the horses were apparently severe enough to warrant euthanasia.

Once again, there is ample information available on the effects of selenium contamination that results from phosphate mining, in this case effects on domestic livestock, yet the DEIS is silent on this. And once again the DEIS has failed to include a “hard look” at the impacts that have [occurred], continue today, and will be further exacerbated by the proposed Idaho Rule. (Organization, #1649.48–49.31000.810)

The effects of selenium contamination go beyond the impacts to waters, wildlife, and livestock. There have been, and continue to be, effects on human populations. Yet, like these other resources, the DEIS is silent on these effects, providing yet another example of the failure of the Forest Service to take the necessary “hard look” at the effects of the proposed Idaho Rule. (Organization, #1649.51.31000.790)

The following examples provide virtually all of the examples (except for discussions of the “economic analysis” of phosphate mining (which we address below in our comments) of the substantive discussions of phosphate mining contained in the DEIS. Mineral activities. No recommendation, authorization, or consent to road construction or reconstruction associated with new mineral leases, except such road construction or reconstruction may be authorized in association with phosphate leasing [Footnote 73: DEIS at 29] Mineral activities: Permitted, after necessary environmental analysis is completed.

[Footnote 74: Ibid. at 30]. The Idaho Roadless Rule also would prohibit road construction/reconstruction in the Backcountry theme, except as associated with phosphate leasing. Surface occupancy without road construction/reconstruction would be permissible for all mineral leasing. The Rule would permit both surface occupancy and road construction/reconstruction for phosphate resources in the Backcountry theme. The (General Forest, Rangeland, and Grassland) GFRG theme would permit both surface occupancy and road construction or reconstruction for all leasable mineral activities. [Footnote 75: Ibid. at 139–140.]

There are 13,400 acres of known unleased phosphate deposits on the Caribou-Targhee National Forest. About 12,100 acres (90 percent) are located within the Backcountry and GFRG themes. Under these themes, road construction or reconstruction would be permissible to develop these phosphate deposits. These deposits are located within nine roadless areas (Dry Ridge, Huckleberry Basin, Meade Peak, Sage Creek, Schmid Peak, and Stump Creek on the Caribou portion of the forest; and Bald Mountain, Bear Creek, and Poker Creek on the Targhee portion of the forest) and could eventually be mined over an extended period of time (50 or more years). There is a potential risk to soil resources on these 12,100 acres when and if development should occur. Site-specific analysis would occur prior to any future exploration or development and mitigations applied. [Footnote 76: Ibid. at 152.] Existing phosphate leases. About 9,100 acres of phosphate deposits can be found in seven roadless areas (Dry Ridge, Huckleberry Basin, Meade Peak, Sage Creek, Schmid Peak, Stump Creek, and Mount Jefferson) and are under existing lease. Some of these acres have been mined to date (the total amount is unknown). About 1,100 acres, associated with the Smoky Canyon Mine expansion, are reasonably foreseeable to be developed within the next 15 years. The Smoky Canyon Mine expansion would affect the Sage Creek and Meade Peak Roadless Areas.

It is also reasonable to assume that the remaining phosphate deposits currently under lease, roughly 8,000 acres within the seven Roadless Areas, would likely be permitted and developed sometime in the extended future (50 or more years). Using the Smoky Canyon expansion as an example of the level of activity expected, an estimated 17 miles of haul road construction and other surface mining disturbance would ultimately take place within the seven Roadless Areas. It is likely new protective measures to address selenium would be incorporated into the mine plan of operations before these mines become active. In addition, three of the roadless areas (Dry Ridge, Huckleberry Basin, and Stump Creek) have [Section] 303(d)-listed streams. Any future development would require separate analysis to address a specific plan of operations. It is likely mitigation would be required to reduce potential effects from selenium and address 303(d) streams. [Footnote 77: Ibid. at 157.] Clearly, this is not the “hard look” NEPA requires. (Organization, #1649.64–66.32000.423)

3-54 Public Concern: The Forest Service should revise the analysis of the effects of phosphate mining.

BECAUSE THE PROJECTIONS UNDERESTIMATE THE LIKELY DEVELOPMENT

On page 1144, the preamble states, “no differences in phosphate production are projected across alternatives.” The 2001 Rule prohibits road construction associated with new mineral leases, whereas the proposed Rule would allow development in these areas. It is unclear how the DEIS reaches the determination that no additional phosphate mines would be developed, considering the current consideration of the Smoky Canyon Mine, which would mine within Roadless Areas and to which roads would be prohibited under the 2001 Rule. Mining firms have similarly expressed strong interest in developing other mines within Roadless Areas on the Caribou-Targhee National Forest and the assumption that these would not be developed within the next 50 years appears inaccurate. (Preservation/Conservation, Boise, ID - #4156.28.21000.423)

TO ENSURE THAT THE PROVIDED INFORMATION IS ACCURATE

The Forest Service was obliged to ensure that the information that they include in the DEIS is accurate, but also ensure the “professional integrity, including scientific integrity, of the discussions and analyses” contained in the DEIS. [Footnote 59: 40 CFR [Sections] 1502.22, 1502.24.] The DEIS’s claim is inaccurate and misleading and fails to meet one of NEPA’s basic thresholds. The DEIS should have also noted that in both 2006 and 2007 phosphate rock production in the US dropped, and in 2007 it “fell below 30 million tons for the first time in more than 40 years, owing to lower production in

Florida.[Footnote 60: Ibid.] While worldwide production increased in 2007, US production decreased.[Footnote 61: USGS, 2008] The US accounted for approximately 20 percent of worldwide phosphate rock in 2007, with the western phosphate field accounting for about 3 percent of world production.[Footnote 62: Ibid.] Because the DEIS includes some statistics and information about phosphate rock production, apparently in an attempt to justify the special treatment phosphate mining is given in the proposed Idaho Rule (such as the exemption for phosphate leasing and mining in roadless lands that are placed in the Backcountry/Restoration classification), the Forest Service was then obliged to include a full and accurate description of how phosphate mining on Forest Service lands in Idaho fits into both the national and international phosphate rock mining and production scheme of things. (Organization, #1649.54–56.32000.423)

TO ACKNOWLEDGE THAT CURRENT MINING PRACTICES ARE NOT LIKELY TO RESULT IN REDUCED IMPACTS OVER PAST PRACTICES

While the impacts and outcomes from phosphate mining are a result of past and current phosphate mining, we now turn our attention to what future effects of phosphate mining may be as garnered from the DEIS. According to the DEIS, the Forest Service believes that mining practices will improve, and that there just won't be the impacts that occur as we write these comments. As we are told: An EIS is in progress for a proposed expansion of the Smoky Canyon Mine (USDI BLM, USDA Forest Service, 2006 and 2007). The Smoky Canyon expansion proposes to mine about 2 million tons of phosphate ore per year from 2,080 acres of leased lands. The proposed mine plan would disturb 1,040 acres of surface in the Sage Creek Roadless Area and 60 acres in the Meade Peak Roadless Area. About 320 acres of the total surface disturbance within the Roadless Areas is proposed to occur off of existing lease holdings or on proposed lease modifications. [Footnote 63: DEIS, at 132]....

We are then assured: It is likely new protective measures to address selenium would be incorporated into the mine plan of operations before these mines become active [Footnote 65: Ibid. at 157]. However, that is not the case. We will also use the Smoky Canyon Mine Panels F and G example, which was used by the Forest Service in preparing the DEIS. We submit as part of our comments on this DEIS our detailed comments, including Appendices, on the recently released FEIS for the Smoky Canyon Mine expansion. [Footnote 66: Exhibit 1. GYC et al. 2008. Comments on Smoky Canyon Mine Panels F&G Proposed Mine Expansion/Final Environmental Impact Statement (hereinafter Exhibit 1).] That proposal is evidence that nothing has really changed in terms of the impacts the public can expect from phosphate mining....

[T]he Smoky Canyon Mine expansion—the best the industry could offer—falls far short on many counts, as summarized below. The Agency Preferred Alternative considered in the FEIS is unacceptable because it will result in increased selenium contamination of already contaminated ground and surface waters in the area. The amount of selenium contamination in ground and surface waters that will result should the proposed expansion be permitted to go forward has been seriously underestimated by the FEIS due to flaws in groundwater modeling, the reliance on the new and untested “store and release” cover design, and the hoped for cleanup of the existing Smoky Canyon Mine Superfund site.

Not only has the current impact of selenium on aquatic resources been “wished away” in the FEIS with the addition of Appendix 3C, but also the potential cumulative impact of the added selenium that will result from expanded mining has been seriously underestimated, due in large part to the document's continued failure to take into account the bio-accumulative nature of selenium. The impacts of connected actions at the mine have been erroneously excluded from analysis. Unjustifiable assumptions about the efficacy of reclamation, Best Management Practices and other corrective actions, as well as the resulting impacts have been made repeatedly. Other resources of the area, including especially fish, are already experiencing selenium-related stress, which is certain to increase if the expansion is approved. The severe impacts that the mine expansion will have on Yellowstone cutthroat trout have not been appropriately assessed. Conclusions cannot be drawn about other species of wildlife because the Forest Service has not selected appropriate management indicator species. The real social and economic tradeoffs of approving the proposed expansion have not been acknowledged or adequately assessed. The FEIS suffers from significant flaws and is so inadequate as to preclude meaningful decision-making. In addition, the Agencies have attempted to make up for these flaws by shoehorning thousands of pages of new information into the FEIS....

In addition to the Forest Service's own experts, both the Wyoming Department of Environmental Quality [Footnote 71: John V Carra. Wyoming Department of Environmental Quality. Final Environmental Impact Statement, Smoky Canyon Mine, Panels F&G. December 14, 2007] and US Environmental Protection Agency [Footnote 72: Michelle Pirzadeh. US Environmental Protection Agency Comments on the Smoky Canyon Mine Panels F&G. December 20, 2007] expressed grave reservations about the mine expansion and requested that the Forest Service make radical changes to the mine and reclamation plan. As noted above, the DEIS's disclosures fail to meet NEPA's requirement to take a "hard look" at the impacts of phosphate mining that will result from this proposal. (Organization, #1649.63.32000.423)

TO INCLUDE IMPACTS TO SOIL RESOURCES

There has been no credible assessment of impacts to soil resources from phosphate mining and associated haul road construction/reconstruction. There is no disclosure here. The assessment has been passed off to the future. (Recreation/Conservation Organization, Boise, ID - #1723.55.31000.230)

3-55 Public Concern: The Forest Service should disclose the cost of reclamation of retired phosphate mines and how that cleanup will be funded.

BECAUSE THE SECRETARY IS REQUIRED TO CONSIDER THE COST AND FEASIBILITY OF RECLAMATION

The USDA is required to take the Tribal and public interest into account when approving leases and may only approve a lease if it is a "valuable deposit." Case law regarding the disposition or leasing of public lands states that the Secretary must take into account the cost and feasibility of reclamation when balancing the economic feasibility of a proposal to mine phosphate [Footnote 38: Kerr-McGee Corporation v. Hodel 630 F. Supp. 621 (D.D.C. 1986). The court held that "[t]o demonstrate the discovery of 'valuable deposits' of phosphates" that would entitle them to mining leases, the appellants were "required to show the economic and technological feasibility of reclaiming the lands covered by the lease applications," and that "[t]he restoration technologies necessary to insure the adequate utilization of the Osceola Forest for its primary purposes did not exist in January 1983 or in 1984, and did not exist at any earlier time." 630 F. Supp. at 629]. Given the extreme costs and uncertain results regarding the reclamation of retired, contaminated phosphate mines, it is reasonable to request that any future document disclose the amount, per reclaimed acre, which is associated with phosphorous mining. The disclosure should also detail how much of the cleanup is Federally, State-, or privately funded. The Petition should be denied because it contains a permissive attitude and multiple exemptions for phosphorous exploitation that will irreversibly alter the landscape of Southern Idaho. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.122.20000.423)

3-56 Public Concern: The Forest Service should include an analysis of the cumulative effects of phosphate mining.

BECAUSE PHOSPHATE MINING THREATENS THE ECOLOGICAL HEALTH OF THE REGION

Phosphate mining threatens the ecological health of the region. The DEIS fails to disclose and discuss the past, present, and future cumulative impacts of phosphate mining by failing to include relevant information on the extent of the negative impacts already occurring in southeast Idaho as a result of phosphate mining. In fact, there is little analysis of the effects of phosphate mining or new road building associated with such mining in the DEIS. The DEIS contains approximately four pages of text that address phosphate mining, and over half of that is redundant. Yet the impact of selenium is documented as a clear risk of mining on the surrounding environment. [Footnote 17: Smokey Canyon Phosphate Mine Final Environmental Impact Statement. March 1982. pgs. 2-22, 2-23 J.R. Simplot Co., Caribou County, Idaho.] The harmful impacts of phosphate mining, including selenium pollution, on the lands, waters, and wildlife habitats of Idaho's National Forests are well documented. Selenium contamination from seventeen mine sites, including all three active mines, poses such immediate and severe threats that they have been determined to be "Superfund" sites by the U.S. Environmental Protection Agency. [Footnote 18: USEPA, USDA, IDEQ, USFS, USDO, BLM, USFWS, BIA. Area-Wide Investigation of Contamination from Phosphate Mining in Southeastern Idaho, Consent Order/Administrative Order on

Consent, 2003. See also <http://cfpub.epa.gov/supercpad/cursites/copinfo.cfm?id=1002245>.] Selenium bio-accumulates—it builds up in the food chain with increasing concentrations in plants, fish, and animals, including trout, deer, and elk that are eaten by local hunters and anglers and their families. [Footnote 19: A. Dennis Lemly, Ph.D., U.S. Department of Agriculture, Forest Service, Southern Research Station, Fisheries Research Unit, February 21, 2006 letter “RE: Draft Environmental Impact Statement for Smoky Canyon Mine Expansion Proposal” “To: Smoky Canyon Mine DEIS, c/o The Shipley Group, P.O. Box 2000, Bountiful, Utah 84011-2000. See also Comments of Steven J. Hamilton, Ph.D., on Smoky Canyon Mine, Panels F & G, Draft Environmental Impact Statement prepared by U.S. Department of the Interior, Bureau of Land Management, Idaho Falls District, Pocatello Field Office (lead agency) and U.S. Forest Service and Idaho Department of Environment Quality, March 15, 2006.] It is known to have contaminated birds, elk, sheep, and Yellowstone cutthroat trout. The Forest Service estimates it will cost hundreds of millions of dollars to permanently clean up the existing phosphate mess. The proposed Idaho rule would allow even more mining, yet the DEIS fails to disclose the extent of current selenium contamination resulting from phosphate mining, or disclose that there are currently 17 Superfund sites resulting from that selenium contamination, or that some of the existing, operating mines are operating illegal “open dumps” as defined by RCRA [Resource Conservation Recovery Act]. (Organization, #1824.26–27.31000.423)

3-57 Public Concern: The Forest Service should provide an independent analysis of expansion beyond current mining lease boundaries.

BECAUSE EXPANSION WILL FURTHER DEGRADE ROADLESS AREAS

There has been considerable debate about whether or not ongoing leasing activities can be geographically expanded beyond current lease boundaries; particularly phosphate leasing on the CTNF [Caribou-Targhee National Forest]. The Proposed Rule contains text at [Section] 294.24(d) that resolves this question in the affirmative. At the effective date of a final Rule, existing operations could expand beyond their current boundaries, including such lands as are necessary for access. The DEIS estimates an additional 12,100 acres will potentially be affected.

This would allow for the expansion of current mining operations into IRAs [Inventoried Roadless Areas], and we will face the same expansion issues with future mine expansions as we do with Smoky Canyon. An independent analysis of this exemption in the Rule should be analyzed because this in essence will allow for the further degradation of IRAs adjacent to mining activities throughout the entire phosphate bed region. This analysis should take into account the environmental costs associated with remediation and contamination based on the probability that hazardous substances may present a threat to human health or the environment. The Tribes are opposed to an exemption for mining activities in IRAs or exemptions for mineral expansions into adjacent IRAs. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.95.30000.423)

3-58 Public Concern: The Forest Service should ignore assertions that the proposed Idaho Roadless Rule will open a large percentage of roadless acres to phosphate mining.

BECAUSE ONLY A SMALL PERCENTAGE OF ROADLESS AREAS WILL BE AFFECTED

After attending the public hearing in Pocatello regarding this proposed Rule on February 21, 2008, I was appalled at the lies and deceptions that were being spewed by the anti-mining groups regarding how this Rule addresses phosphate mining and exploration. The allegation made by these groups that this proposal is a thinly veiled attempt by the USFS to open hundreds of thousands of acres to phosphate mining is simply untrue and an abomination of this public process that allows for thoughtful, factual input from the public. I'd like to provide the following to give the agency a perspective regarding these allegations: There are 9,304,200 acres of IRA in the State of Idaho of which 735,000 acres reside in the CTNF [Caribou-Targhee National Forest]. This represents approximately 8 percent of the total IRAs [Inventoried Roadless Areas] in the state. Currently 10,800 acres of phosphate leases reside in IRAs within CTNF [Caribou-Targhee National Forest]. This represents 0.1 percent of the IRAs potentially impacted due to phosphate mining leases in the State of Idaho, or 1 percent of the IRAs in the CTNF. No matter which scenario one utilizes to scrutinize the potential impact of phosphate mining on IRAs in the

State of Idaho, the result is still the same—insignificant. Any attempt to skew numbers to make wild allegations regarding the amount of potential phosphate mining in IRAs located in the State should be recognized as bogus. (Individual, #1815.15.10430.423)

3-59 Public Concern: The Forest Service should disclose the extent of selenium contamination.

BECAUSE OF THE EXISTING 17 SELENIUM SUPERFUND SITES AND ILLEGAL OPEN DUMPS

Including disclosure that there are 17 selenium Superfund sites and that some operations are illegal under RCRA [Resource Conservation and Recovery Act]. The DEIS fails to disclose the extent of current selenium contamination resulting from phosphate mining; or disclose that there are currently 17 Superfund sites resulting from that selenium contamination; or that some of the existing, operating mines are operating illegal “open dumps” as termed by RCRA. (Organization, #1649.26.31000.423)

BECAUSE PHOSPHATE MINING HAS CREATED ILLEGAL OPEN DUMPS

The DEIS failed to disclose that phosphate mining has created “illegal open dumps” under RCRA [Resource Conservation and Recovery Act]. For example, the proposed expansion of the Smoky Canyon Mine will violate the federal prohibition against open dumping set forth in Section 4005(a) of RCRA, 42 U.S.C. [Section] 6945(a). Section 4005(a) states that “any solid waste management practice or disposal of solid waste . . . which constitutes the open dumping of solid waste . . . is prohibited. [Footnote 25: 42 U.S.C. [Section] 6945(a).] Discarded materials resulting from mining operations are considered solid waste under RCRA. [42 U.S.C. Section 6903(27).] EPA [U.S. Environmental Protection Agency] promulgated criteria under Section 6907(a)(3) defining solid waste management practices which constitute the prohibited open dumping of solid waste, and those criteria are contained in 40 C.F.R. Parts 257 and 258. And the Smoky Canyon Mine is just one example of this issue. (Organization, #1649.31.31000.130)

BECAUSE SELENIUM CONCENTRATIONS IN THE BLACKFOOT RIVER EXCEED IDAHO STATE WATER QUALITY STANDARDS

The DEIS fails to disclose the extent of selenium contamination from existing mines. The results of phosphate mining to date is that the Blackfoot River from its headwater tributaries to its confluence with the Blackfoot Reservoir has selenium concentrations that exceed Idaho State water quality standards for aquatic species by two to one hundred times. (Organization, #1649.27.31000.423)

BECAUSE SELENIUM HAS EXTIRPATED THE YELLOWSTONE CUTTHROAT TROUT FROM THE BLACKFOOT RIVER

The DEIS fails to disclose that Yellowstone cutthroat trout have been extirpated from at least one Blackfoot River tributary, East Mill Creek, as a result of selenium contamination from the North Maybe Canyon phosphate mine. (Organization, #1649.28.31000.310)

TO INCLUDE ANALYSIS OF EFFECTS ON SECTION 303(D)-LISTED STREAMS

The DEIS glosses over the effects of phosphate mining on surface water quality in southeast Idaho, in particular selenium contamination caused by phosphate mining. The DEIS, in several places notes:

In addition, three of the Roadless Areas (Dry Ridge, Huckleberry Basin, and Stump Creek) have [Section] 303(d)-listed streams. Any future development would require separate analysis to address a specific plan of operations. It is likely mitigation would be required to reduce potential effects from selenium and [to] address 303(d) streams. [Footnote 27: DEIS at 157.]

Several 303(d) streams overlap known unleased phosphate deposits in the Dry Ridge, Huckleberry Basin, and Stump Creek Roadless Areas. Any phosphate mining activities in these Roadless Areas would have to ensure [that] the streams are not further impaired. [Footnote 28: Ibid at 160-161.] (Organization, #1649.33.31000.423)

The DEIS failed to disclose the effects of phosphate mining-caused selenium contamination on two of the largest Yellowstone cutthroat trout populations remaining within their historic[al] range in Idaho—the Blackfoot River population and the upper Snake River. (Organization, #1649.40.31000.352)

3-60 Public Concern: The Forest Service should analyze the effects of mining over the next 50 years on the Caribou-Targhee National Forest.**BECAUSE FURTHER MINING WILL CONTAMINATE LANDS OF THE SHOSHONE-BANNOCK PEOPLE**

It is unacceptable to the Tribes [Shoshone-Bannock] that the USDA [U.S. Department of Agriculture] has chosen to sacrifice these lands to the mineral industry because of a known phosphate deposit. The IRAs [Inventoried Roadless Areas] surrounding existing mines provide a necessary buffer between these mining activities and the wildlife that still utilize these areas. Allowing for further mineral exploitation of these Roadless Areas has a risk of irretrievably damaging the ability of fish, wildlife, and plants to survive in perpetuity.... Although the Rule characterizes the development in terms of distant future, downplaying the significance of activities as uncertain, the Tribes see it another way. The impact of this management direction will be contamination on Idaho Roadless Areas in the CTNF [Caribou-Targhee National Forest] for generations to come.... For more than 50 years, there will be mining and further degradation upon the lands that the Shoshone and Bannock peoples still call “home’.” It is careless to commit resources and lands to this level of development for such a long period of time, without fully considering the impact that it will have on future generations. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.56.44210.740)

3-61 Public Concern: The Forest Service should address the damage caused by phosphate mining.**BECAUSE THE IMPACT OF SELENIUM POLLUTION IS PERMANENT**

The Draft EIS for the proposed Idaho Rule fails to address the damage already caused by phosphate mining on public lands. The bio-accumulative effects of selenium toxicity are just beginning to be understood and documented by the scientific community. However, the impact of this toxicity on aquatic environments, wildlife, domestic stock, and human populations will be present forever in southeast Idaho. (Individual, #1952.3.31000.423)

3-62 Public Concern: The Forest Service should clarify the definitions of “near term” and “long term” in its analysis of the effects of phosphate mining.

Your discussion of phosphate resources and mining failed to include why it is important to the American public that this resource be developed in Idaho Roadless Areas. Under the 2001 Rule, there would be no new road construction or reconstruction on the 13,400 acres of known unleased deposits on the Caribou-Targhee National Forest. According to your opinion, the inability to mine the phosphate because of road prohibitions would not be a near-term impact. However, for the long-term, this alternative would forego the recovery would forego the recovery of an estimated 603 million tons of phosphate resource. In this discussion, what is your definition of near-term and long-term? Why is this speculative, long-term impact so important to the American public vis-à-vis the loss of Idaho Roadless Areas? What are the assumptions inherent in your assessment? (Recreation/Conservation Organization, Boise, ID - #1723.54.20000.423)

3-63 Public Concern: The Forest Service should revise the economic analysis of phosphate mining.**TO INCLUDE THE ECONOMIC IMPACTS OF THE SUPERFUND SITES
THAT RESULTED FROM PAST MINING ACTIVITY**

The DEIS states numerous times that the economic impact of phosphate mining is a positive contributor to the local economy and the surrounding region. This analysis is biased and goes against the great weight of the evidence in several respects. First, it fails to analyze the impact on water quality throughout the Blackfoot and Salt River drainages. [Footnote 39: As noted above, there are currently over 100 miles of streams that are impaired because of Se[elenium] in the water, affecting fish population and groundwater. There should be no additional mining activity until the nature and scope of the contamination is fully assessed so that the open mining management does not contribute to a problem already in existence]. Second, there is a failure to analyze the economic impacts associated with

numerous regional Superfund sites that are the result of past mining activity. Finally, there is a failure to quantify the actual economic impact from the loss of recreational activities in the region and impacts to Tribal [Shoshone-Bannock] trust resources from increased phosphate mining in the IRAs [Inventoried Roadless Areas]. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.123.31000.423)

TO INCLUDE THE CONTRIBUTIONS OF ECO-TOURISM TO LOCAL ECONOMIES

There is no discussion of the contribution that is made to local economies as a result of eco-tourism and the potential impact that future mining activities pose to the greater region. This one-sided analysis reveals a clear bias toward the alleged benefits of phosphorous-related activities without taking into account the cost to the public. These costs have been clearly documented and are readily visible in the phosphate deposit region. The Tribes [Shoshone-Bannock] demand that any future analysis account for the costs of remediation, environmental degradation, loss of wildlife habitat, damage to Treaty [Fort Bridger Treaty of 1868] resources, impacts to Tribal water quality, degradation of the Blackfoot and Salt River drainages, adverse impacts to resident fish, impacts to local grazing practices, impacts to outdoor interests, and adverse impacts to recreational opportunities. It is clear that the DEIS failed to disclose these impacts as required for direct or indirect effects, much less as cumulative effects from the permissive management themes surrounding phosphate mining. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.125.31000.423)

Oil and Gas Development

3-64 Public Concern: The Forest Service should analyze the potential impacts of oil and gas development in Roadless Areas.

BECAUSE OIL AND GAS DEVELOPMENT WILL OCCUR UNDER THE IDAHO ROADLESS RULE

The Forest Service is currently preparing an EIS for oil and gas leasing on the Caribou zone of the Forest. Under the Idaho proposal, significant areas of the Forest could be open for oil and gas leasing/development, including more than 261,000 acres of Roadless forests. In anticipation of that possibility, the Caribou Oil & Gas NOI [Notice of Intent] indicated that it would include one alternative to lease within Roadless Areas, if the proposed Idaho Rule is approved. While the DEIS suggests that “that none of the four wells drilled would be capable of economic commercial production (Robison 2007) [Footnote 86: DEIS at 126], we are convinced that oil and gas exploration and development will occur. For example, just this past September through January, a large oil and gas drilling rig—capable of drilling wells over ten thousand feet deep—drilled an exploration well on private land just north of Grays Lake National Wildlife Refuge and adjacent to the Caribou-Targhee National Forest just west of the Caribou City IRA [Inventoried Roadless Area]. The DEIS fails to give an assessment of future oil and gas development that would result from implementing the Idaho Rule. (Organization, #1649.82.31000.421)

BECAUSE ANALYSIS OF OIL, GAS, AND GEOTHERMAL DEVELOPMENT UNDER THE IDAHO ROADLESS RULE IS REQUIRED BY NEPA

The DEIS for the Rule specifically states why there is no analysis on oil and gas and geothermal development: The Idaho Roadless Rule would also permit road construction/reconstruction in the GFRG [General Forest, Rangeland, and Grassland] theme for any mineral or energy development. Only oil and gas and geothermal exploration are likely to occur in Idaho Roadless Areas (see Minerals section). Oil and gas are found only on the Caribou-Targhee National Forest and may be developed on the Caribou portion of the forest (see Mineral section). The Caribou is undergoing a leasing analysis that predicts four exploration wells could be drilled over the next 15 years. Six miles of road are anticipated to be needed to access these wells. The projection does not account for this road access because it is unknown if the wells would be located in GFRG within an Idaho Roadless Area. The projection also does not account for geothermal energy development because at this time there is no trend information to reasonably predict a surge in geothermal activity. The assumption is that geothermal development would first take place where roads are already developed, generally outside Idaho Roadless Areas because of the reduced cost of development. It is probable that sometime in the future geothermal development in Idaho Roadless Areas may become economical. If and when this happens, the road development

required to develop geothermal wells could be greater than the road construction/ reconstruction projections based on past and current trends. [Footnote 87: Ibid. at 122–23.]

The leasing analysis for the Caribou National Forest has not yet been completed. Thus, legally, the analysis for the Idaho Rule cannot tier to it and cannot rely upon it for determining environmental effects. Also, until the new leasing analysis is completed, most of the Caribou, including all the Roadless Areas, are under an NSO (no surface occupancy) restriction, which means that no oil and gas exploration and development can occur there now under the plans. The rest of the development allowed in the GFRG theme, with the exception of phosphate mining, is based on assumptions and a total lack of substantive NEPA analysis. Further, to allow development that is so speculative and based upon nothing more than assumptions is not logical and it is not legal. As stated in the DEIS for oil and gas, since 1903, about 145 wells have been drilled throughout Idaho to explore for oil and gas, but not one has yet yielded a commercial discovery. With no commercial discovery, all the oil and gas leases on NFS [National Forest System] lands in Idaho have expired, and there are presently no active oil and gas leases on any National Forest in Idaho. [Footnote 88: Ibid. at 126.] The CNF RFP [Caribou National Forest Revised Forest Plan] specifically states that no oil and gas decisions are made in that plan [Footnote 89: CNF RFP at 2-11], so it does not bother with any analysis of impacts from something it did not even make a decision on. It also states that the entire Caribou National Forest is “not a high priority forest” for oil and gas development [Footnote 90: CNF RFP F[inal] EIS at 3-139]. Thus, the decision in the proposed Idaho Rule to allow oil and gas development and its associated roads in the GFRG theme is totally unsupported by any NEPA analysis. (Organization, #1649.83–84.32000.420)

3-65 Public Concern: The Forest Service should explain the rationale for opening areas in the Targhee National Forest to oil and gas development and analyze the impacts.

The Targhee National Forest is currently closed to oil and gas development. As stated in the Rule DEIS: The forest supervisor of the Targhee National Forest issued an oil and gas leasing decision in 2000 (Reese 2000). The decision made much of the forest either unavailable for leasing or available for leasing with a no surface occupancy (NSO) lease stipulation. The large expanse of the designated NSO areas renders them virtually impossible to economically explore and develop. Directional drilling could be used to explore portions of NSO leased lands adjacent to areas where surface occupancy may be allowed. However, it is not expected that the industry would incur the extra expense of directional drilling without the promise of the full economic enjoyment of the entire lease area. This is particularly true in relatively unexplored areas such as Idaho Roadless Areas, where the complex geology and lack of known commercial production greatly increase the financial risk of drilling. No wells have been drilled in the Targhee portion of the Caribou-Targhee National Forest since the leasing decision. (Rule DEIS at 126-27)

Neither the proposed Idaho Rule or DEIS explain the rationale for opening several hundred thousand acres of Roadless Areas to the potential of oil and gas development. In addition, the Idaho DEIS illegally tiers its lack of analysis with regard to oil and gas to a currently incomplete review and Forest Plans that do not examine the impacts of oil and gas in any NEPA framework. (Recreation/Conservation Organization, #1649.85.32000.421)

Alternative Energy

3-66 Public Concern: The Forest Service should consider the increasing emphasis on developing alternative sources of energy.

The draft Idaho Rule fails to consider the increasing emphasis on developing alternative sources of energy, as Directed by the Energy Policy Act of 2005. Three energy sources that might impact Idaho’s Roadless Areas include wind power, geothermal power, and biomass utilization. (Preservation/Conservation, Boise, ID - #4156.133.31000.800)

3-67 Public Concern: The Forest Service should consider the impacts of wind projects.

BECAUSE THEY ARE A REASONABLY FORESEEABLE ACTION

The Forest Service is currently in the process of reviewing directives to address issues related to siting wind energy projects. While the stated goal is to be consistent with Forest Plans, the flexibility for amendments is unclear. . . .

The recommended changes may affect siting and facilities guidelines for wind projects and infrastructure and is a reasonably foreseeable action. While our [Idaho Conservation League] organization is generally supportive of wind projects, we are concerned that modifications under the draft Idaho Rule will make it easier to site wind power projects in Idaho Roadless Areas. The draft Idaho Rule does not take into account possible impacts of wind power structures, transmission lines, or other infrastructure on roadless values, including visual resources, migratory birds, and bats. (Preservation/Conservation, Boise, ID - #4156.134.31000.800)

3-68 Public Concern: The Forest Service should analyze how the Idaho Roadless Rule would affect access to biomass utilization and the effects of biomass utilization on Roadless Areas.

The United States Department of Agriculture (USDA) and the United States Department of Energy (DOE) both place high importance on developing resources and conversion technologies for producing fuels, chemicals, and power from biomass. The two departments are working together on several aspects of bioenergy. . . .

While the majority of available material from biomass is from the roaded front country, there have been several attempts to open Idaho Roadless Areas to commercial biomass utilization. While our organization [Idaho Conservation League] has been supportive of economical biomass utilization, it is unclear what ecological effects an industrial approach would have on roadless values. In June 2007, Idaho Representative Bill Sali tried to insert an amendment in the Energy Reform and Revitalization Act of 2007 that would allow biomass utilization in Inventoried Roadless Areas. The House Natural Resources Committee rejected this amendment, but further changes in roadless guidelines will invite additional proposals. The draft Idaho Rule does not analyze how changing protective categories would affect access to biomass utilization, nor does it analyze the potential impacts of biomass utilization on Roadless Areas. (Individual, Duluth, MN - #4156.135.31000.800)

3-69 Public Concern: The Forest Service should not rely on Forest Plans for analysis of geothermal development.

BECAUSE THE FOREST PLANS ARE INCOMPLETE AND THEY DO NOT ADEQUATELY CONSIDER GEOTHERMAL EFFECTS

As to geothermal development, the Targhee Plan does not even mention the word “geothermal,” let alone have any analysis on the impacts from allowing it in any Roadless Areas. The Targhee EIS states that the potential for geothermal development is low, and it does not contain any analysis of impacts of allowing it. In the Caribou Plan, it states that the Roadless Areas there have “no geothermal development potential.” (Caribou Plan F[inal] EIS at 3-139.) It even states that the entire Caribou National Forest is “not a high priority forest” for geothermal development. (Caribou FEIS at 3-139.) Therefore, there is no NEPA analysis on geothermal development in the Caribou Plan. For the [Idaho Roadless] Rule DEIS to rely on these Plans and EISs for opening any of the GFRG [General Forest, Rangeland, and Grassland] Roadless Areas to geothermal development and its associated roads, that is totally unsupported. (Preservation/Conservation, Boise, ID - #4156.203.31000.424)

3-70 Public Concern: The Forest Service should not prescribe permissive management for geothermal development.

TO AVOID USING THE TERMS “OPEN AND UNRESTRICTED” IN CONNECTION WITH ENERGY DEVELOPMENT

The Proposed Rule supports “open and unrestricted” geothermal exploration and development opportunities on 7 percent (630,000 acres) of the Roadless Area in the GFRG [General Forest, Rangeland, and Grassland] theme, 660/0 of which is in southern Idaho. Those lands open for geothermal development are environmentally sensitive and culturally significant lands for the Tribes. Idaho has high potential for geothermal development, in terms of potential sites for facilities. Conversely low is the capacity of Idaho’s electrical infrastructure to deliver power from the facility. This fact evidences the probability that more transmission line “right of ways” and easements will be necessary through the Roadless Areas to allow for this type of energy development. The Tribes oppose the permissive management in GFRG IRAs [Inventoried Roadless Areas] for the geothermal development Rule [because]: The language in the DEIS, “open and unrestricted,” should never be used in connection with exploration or development of energy projects on any lands, especially the IRAs of Idaho. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.61.44220.800)

BECAUSE THE DEIS DOES NOT PROVIDE SCIENTIFIC STUDIES REGARDING THE EFFECTS OF GEOTHERMAL POWER DEVELOPMENT ON ROADLESS AREAS

The Tribes oppose the permissive management in GFRG IRAs [Inventoried Roadless Areas] for the geothermal development Rule [because]: There are no scientific studies included in the DEIS that have indicated the effects of geothermal power on IRAs or that would support “open and unrestricted” geothermal exploration and development on these lands. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.67.44220.800)

3-71 Public Concern: The Forest Service should revise the “open and unrestricted” language associated with geothermal development.

The proposed Rule supports “open and unrestricted” geothermal exploration and development opportunities on 7 percent (630,000 acres) of the Roadless Area in the GFRG [General Forest, Rangeland, and Grassland] [management] theme, 660/0 of which is in Southern Idaho. Those lands open for geothermal development are environmentally sensitive and culturally significant lands for the Tribes [Shoshone-Bannock]. Idaho has high potential for geothermal development, in terms of potential sites for facilities. Conversely low is the capacity of Idaho’s electrical infrastructure to deliver power from the facility. This fact evidences the probability that more transmission line “right of ways” and easements will be necessary through the Roadless Areas to allow for this type of energy development. The Tribes oppose the permissive management in GFRG IRAs [Inventoried Roadless Areas] for the geothermal development Rule [because]:

The language in the DEIS, “open and unrestricted”, should never be used in connection with exploration or development of energy projects on any lands, especially the IRAs of Idaho. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.61.44220.800)

Road Construction and Maintenance

3-72 Public Concern: The Forest Service should disclose and analyze the effect of removing the distinction between classified and unclassified roads.

TO AVOID USER-CREATED AND OVERGROWN ROADS BEING USED AS A RATIONALE FOR FUTURE LOGGING

In section 294.21, the definitions associated with forest roads, temporary roads and road construction and reconstruction supplant existing definitions established in the 2001 Rule. Those definitions currently apply to Idaho Roadless Areas, and the revision of the definitions would result in impacts. Specifically, the 2001 Rule provided differentiation between classified and unclassified roads. The proposed definitions would eliminate any reference to unclassified roads and the proposed Rule would authorize

logging pursuant to 294.25(c)(2)(iii) that is currently restricted under the 2001 Rule. As a result, user-created and overgrown roads could be used as a rationale for future logging. A District Ranger or Forest Supervisor could designate these unclassified roads as “forest roads” without notice. Under the 2001 Rule, such reclassification of existing “unclassified” roads is considered road construction. No analysis of this issue is provided in the preamble or the DEIS. Further, no distinction is provided on the miles of classified vs. unclassified roads that currently may exist in Idaho Roadless Areas. (Preservation/Conservation, Boise, ID - #4156.34.21000.680)

3-73 Public Concern: The Forest Service should provide an accurate accounting of motorized and non-motorized trails.

TO ALLOW FOR AN ACCURATE ASSESSMENT OF IMPACTS

Current planning projects typically add the number of motorized trails closed to the current miles of non-motorized trails as a measure of the change in non-motorized recreational opportunity. However, current planning projects do not add the miles of roads closed by action to the miles of non-motorized trails. Non-motorized recreationists use roads that are closed and benefit from them because closed roads are open to use by only non-motorized recreationists, are typically clear and easy to walk and bicycle, are covered with natural vegetation within a relatively short time and are quickly used as trails. When roads are closed to motorized recreationists, then they in reality become a non-motorized recreational resource and they must be disclosed as such.

Unfortunately this procedure has not been practiced to date and the miles of recreational resources have been understated in favor of non-motorized recreationists. All planning projects should disclose the added benefit to non-motorized recreational resources resulting from the closure of roads by adding the miles of closed roads to the miles of existing non-motorized trails. We [Capital Trail Vehicle Association] request that this procedure be used by this project and all future Agency projects. Additionally, we request that the cumulative negative impact on motorized recreationists resulting from this lack of adequate accounting be evaluated and adequately mitigated. (Motorized Recreation, Helena, MT - #168.67.22300.500)

3-74 Public Concern: The Forest Service should include the costs of maintaining roads in the economic analysis.

BECAUSE OPENING ROADLESS AREAS TO LOGGING WILL REQUIRE AN ADEQUATE ROAD SYSTEM

The assumption [in the Idaho Roadless Rule] that costs associated with roads will not change between alternatives fails to disclose the potential for permanent roads, and costs associated with maintenance and restoration of roads in order to support ongoing logging activity within and adjacent to Roadless Areas. If many Roadless Areas are opened to increased logging, additional road maintenance will be required over the long-term to maintain an adequate road system. The document from the project file, entitled Rightsizing the Forest Service Road System, Part 1: Road Trend Analysis (Moore, T., USDA Forest Service, Washington, DC, 2007) finds that because of limitations associated with road-related funding, that scenarios for maintaining current levels of access levels are unlikely. On the other hand, if Roadless Area protections remain consistent with the 2001 Rule, the opportunities for road decommissioning may increase, with a corresponding reduction in long-term road-related costs because of additional funding that may be available for maintenance, instead of construction. (Preservation/Conservation, Boise, ID - #4156.26.21000.860)

BECAUSE FUNDING IS INADEQUATE TO MANAGE EXISTING PROBLEMS

There are a number of negative ecological impacts associated with roads. Sediment leaving roads and entering streams degrades habitat for fish. Noxious weeds spread along roadsides. Motorized recreation increases with roads and promotes the expansion of user-created trails. Increases in motorized use create an increased disruption of wildlife and degradation of native plant communities. All of these ecological impacts create a management burden for the Forest Service, which lacks adequate funding to manage the existing problems of weeds, recreation, and roads in poor condition, much less an expansion of these issues. (Organization, #1492.5.64000.2)

Even if temporary roads were required or recommended to have closures or de-commissioning, any expectation that there would be funding for these expensive and controversial actions is not realistic. The 2001 Rule stated, “The agency receives less than 20 % of the funds needed to maintain the existing road infrastructure.” Things have not improved for Forest Service road funding. The Idaho DEIS states, “In fiscal year 2006, the Forest Service received less than 20 percent of the estimated funding needed to maintain its existing road infrastructure (Moore 2007.) [Footnote 105: DEIS at 118]. Any expectation that Idaho will receive additional funds to close, decommission, or maintain temporary roads for forest health activities in roadless areas is not realistic. Diverting appropriated money now budgeted to Idaho national forests for this temporary road-work will only divert money from the other under-funded, existing backlog of road maintenance and restoration work. (Organization, #1649.105.14100.680)

BECAUSE MITIGATION OF ROAD IMPACTS IS SUBJECT TO FISCAL RESOURCES AND MOTIVATION

The development leading to the most significant direct and indirect impacts or effects will be the roads that the 2001 Roadless Rule finally attempted to abbreviate. Roads generate ease of access for both off- and on-road types of vehicles—everybody “loves” a road; and, ease of access creates political pressure for multivariate forms of developments and changes to follow. Anyone denying this reality is only misleading themselves and others. Any attempt to mitigate the effects [of roads] is subject to not only the availability of fiscal resources but the willpower, interest, and enthusiasm of those entrusted to implement and manage; and no guarantees exist to assure that either the fiscal resources or motivations will be available to bring any mitigative efforts into fruition, including the decommissioning of constructed and reconstructed roads. Furthermore, no timetable exists to define when decommissioned roads will be rendered non-useable, or, to render null the ecological and geographical ramifications resulting from constructing and reconstructing roads. (Individual, #1483.3.20000.680)

3-75 Public Concern: The Forest Service should more realistically identify the impacts of road construction.

BECAUSE THE PROJECTED AMOUNT OF ROADWAY TO BE BUILT IS LIKELY MUCH TOO LOW

The DEIS projects that 4 miles of permanent and temporary roads will be built in Roadless Areas in the next 15 years under the proposed action (pg. 80), yet there is no explanation or factual support for how this figure was developed. Given the exceptions for road building, the actual number of temporary roads could be substantially higher; and the Forest Service must analyze the potential impact that significant increases in road mileage would have on wildlife and roadless values. (Organization, #1824.8.31000.680)

3-76 Public Concern: The Forest Service should include an analysis of the effects of temporary roads.

The Draft Environmental Impact Statement (DEIS) does not fully analyze the impacts of additional temporary roads. The proposed Rule would create broad exemptions for road building in Roadless Areas, yet the DEIS fails to adequately consider the direct, indirect, and cumulative impacts that these roads could have on roadless characteristics, wildlife habitat, and other ecological values. (Organization, #1824.6.31000.680)

TO EVALUATE THE EFFECTS OF EROSION, NOXIOUS WEEDS, AND MOTORIZED ACCESS

Temporary roads generally do not include an engineered design and because they will be built in some of the steepest and roughest terrain of Idaho, there is a high risk of failure. This factor has not been adequately considered in the DEIS, and will place many of our high value watersheds and fisheries at real risk. The DEIS acknowledges that temporary roads will become avenues for noxious weed invasion, but underestimated the potential impact of this problem. Noxious weeds are one of our biggest problems in managed landscapes, and the spread of them along road corridors is well documented. The DEIS also does not acknowledge the potential for increasing unauthorized human access as the result of “temporary road” construction. The Forest Service has been unable to control ATV [all-terrain vehicle] and motorcycle traffic in most managed landscapes. As soon as the logging is completed, motorized users will open these “temporary” routes as new paths into the backcountry. While the history of motorized

users modifying old logging routes into user-created trails is well documented, this factor has not even been considered in the DEIS. The Final EIS must discuss impacts of temporary roads in much more detail than the DEIS. Clearly, the risks associated with temporary roads are much greater than what has been reported in the DEIS. (Individual, #1482.9.31000.680)

TO EVALUATE THE EFFECTS ON THE EXISTING ROAD MAINTENANCE BACKLOG

Based on the information presented in the Draft EIS and the proposed Rule, we have identified a number of concerns and questions that should be clarified or otherwise addressed in the Final EIS and final Rule. The lack of specific direction regarding the duration and closure of temporary roads and the potential to exacerbate already significant environmental impacts from a long-standing road maintenance backlog. (Government, #1692.4.31000.680)

3-77 Public Concern: The Forest Service should fully analyze the impacts of road construction on floods.

I was a Forester with the National Forests for 13 years. I have personal experience seeing and monitoring the environmental damage roads cause to streams and resources. I have seen abandoned roads with large gullies and head cuts that would not be repaired in the foreseeable future. I have seen 3 very large flood events in 20 years, and the environmental damage has always been severe and concentrated on roaded areas. Large flood events do not seem to be adequately considered during the environmental analysis process. (Individual, #1705.4.64100.230)

3-78 Public Concern: The Forest Service should analyze the impacts of increased human-caused fires resulting from increased road construction.

TO BE CONSISTENT WITH EARLIER AGENCY ANALYSES

The DEIS fails to disclose the potential increase in human-caused ignitions caused by building new roads in Roadless Areas. The statement that building new permanent or temporary roads into Roadless Areas under the proposed Idaho Roadless Rule will result in “no measurable increase” in the potential for human-caused fires lacks face validity, and directly contradicts analysis from the Forest Service’s earlier analysis in the Roadless Area Conservation Rule FEIS (2000a). That earlier analysis disclosed that - “Human access is likely to be increased by roads, a factor that will greatly increase the chances of both accidental and intentional human ignitions. These human ignitions may be an important source of ignition in many forests.” (USFS 2000a:3-73) - “The scientific assessments of the Interior Columbia River Basin also point out an increased probability of human-caused fire in roaded areas.” (USFS 2000a:3-73)- “For the Western United States (Regions 1 through 6), the chance of a fire occurring is twice as likely in essentially roaded areas as in inventoried roadless areas.” (USFS 2000a:3-104) - “In the West, the chance of a human-caused wildland fire occurring in an essentially roaded area is nearly three times more likely than in an essentially Roadless Area. In the West, 80% of human-caused fires start in essentially roaded areas. In the East, the figure is nearly 97%. Nationally (in all Forest Service regions), it is four times more likely that a human-caused wildland fire will occur in an area that is essentially roaded rather than an inventoried roadless area.” (USFS 2000a:3-106) - “Nearly 99% of all human-caused ignitions and nearly 92% of all lightning-ignited wildland fires occur on land outside of inventoried roadless areas.” (USFS 2000a:3-113) - “The data further reveal that building roads into inventoried roadless areas would likely increase the chance for human-caused fires. Conversely, in areas that are already roaded, fire occurrence data for all causes, human and lightning, indicates that the number of large fires are dramatically higher than in inventoried roadless areas” (USFS 2000a:3-115). The Fuel Management and Fire Suppression Specialist’s Report did weakly state that, “Under the Idaho Roadless Rule there could be an increase in human-caused starts into more areas on the Forests.” (USFS 2007:25) However, more thorough analysis and quantitative assessment of the increased probability and number of potential human-caused ignitions needs to be disclosed in the FEIS. (Organization, #1810.5-6.31000.680)

3-79 Public Concern: The Forest Service should include an approved, peer-reviewed method for constructing and decommissioning roads.**FOR A NEAR-ZERO IMPACT ON THE AREA FOR ANY TEMPORARY ROAD**

The Tribes [Shoshone-Bannock] demand that the F[inal] EIS includes an approved, peer reviewed method for constructing and decommissioning roads within the forest system. The method must use the most up to date GIS data available, and the planning must account for a near-zero impact on the area for any temporary road. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.117.30000.680)

3-80 Public Concern: The Forest Service should analyze the impact of increased fire size in formerly Roadless Areas from increased road construction.**TO BE CONSISTENT WITH EARLIER AGENCY ANALYSES**

The DEIS fails to disclose the potential increase in fire size from building roads in Roadless Areas. Roded forest areas not only have more human-caused fires, but fires tend to be of greater size than wildfires burning inside Roadless Areas. Again, the Forest Service's analysis for the 2000 Roadless Area Conservation Rule disclosed that: - "Nationally, (in all Forest Service regions) there is a two-times greater chance of a large forest fire burning in an area that is essentially roded as in an inventoried roadless area." (USFS 2000a:3-106) - "The median size of large wildland fires for all causes is greater outside inventoried roadless areas in Regions 1" (USFS 2000a:3-108) - The number of large fires are "dramatically higher" in roded areas than in inventoried roadless areas" (USFS, 2000a:3-115). The Fuel Management and Fire Suppression Specialist's Report did disclose that acres burned per start from human-caused fire were 20 times greater outside of Roadless Areas, but failed to disclose in the DEIS the probability of increased fire sizes in Roadless Areas from building new roads. (Organization, #1810.7.31000.680)

3-81 Public Concern: The Forest Service should revisit the estimates for timber harvest and associated road construction.**BECAUSE THE ESTIMATES ARE NOT CREDIBLE**

Your estimate of annual timber harvest and associated road construction/reconstruction for the IRR [Idaho Roadless Rule] is not credible. Your budget reference points (2001–2006 and 2007–2011) are self-serving and misrepresentative. This is strictly biased speculation designed to understate the potential impacts of developing the Roadless Areas. It is projected at an extremely low level to make the IRR more appealing. It is an obvious contradiction when you read your robust estimates of acres requiring silvicultural treatment to promote fuel management and "forest health." Under the allowable cut mandate, management loopholes, and the change in allocation, your low-ball estimates of timber harvest and road construction could easily be exceeded by one forest. You have intentionally failed to represent to the Public the real situation and most likely effects. With flat budgets and a "miniscule" program, you would not come close to meeting your "forest health" goals and objectives. (Individual, #268.34.10440.261)

BECAUSE SOME CRITICAL ASSUMPTIONS ARE NOT VALID

Your projections for timber harvest and road construction in Roadless Areas under the IRR [Idaho Roadless Rule] are incredulous. Some of your critical assumptions are not valid. If budgets are going to remain flat in the near future, why bother with this expensive process to change the roadless allocation when the possibility of obtaining funds for implementation is so bleak? Budgets change annually and could increase under a different administration or change in management emphasis. Republican administrations have never been shy about subsidizing extractive industries. Why would you expect to receive robust funding for roadless development under the 2001 Rule or uncertainty associated with Forest Plan litigation? Your contention that the volume of timber harvested between 2001 and 2006, and projected to be harvested between 2007 and 2011, provides a representative basis for estimating the amount of trees to be cut under IRR is unbelievable. If you are successful at eliminating [the] 2001 Rule and changing the allocation, one could reasonably expect that timber harvest and road construction would accelerate both in the near and long term. If not, then why spend the taxpayer's money on a trivial

process? It is well known that many Idaho forests have detailed timber and roading plans for the Roadless Areas. It would not take extravagant budgets to implement them. The critical limiting factors have been the allocation under the 2001 Rule and the specter of litigation. Adoption of the IRR would eliminate the allocation barrier. (Individual, #268.37.31000.720)

Timber Harvest

3-82 Public Concern: The Forest Service should analyze the environmental effects of the proposed Idaho Roadless Rule.

TO ENSURE THAT IMPACTS ARE ADDRESSED BEFORE A SPECIFIC TIMBER SALE IS PROPOSED

We [Howard County Bird Club] do not accept the statement (DEIS page 216) that “No adverse environmental effects on terrestrial species or their habitat would be expected from the Idaho Roadless Rule, because it does not directly authorize any ground-disturbing activities.” We remember that the Bush administration has also proposed to cease writing Environmental Impact Statements on all forest plans, so no ground-disturbing activities would be analyzed at that stage, either. With this double-whammy, environmental impacts would not be analyzed until a specific timber sale is proposed, and then it’s too late to look at the big picture and consider the national interest. (Organization, #1698.6.31000.351)

3-83 Public Concern: The Forest Service should more realistically identify the impacts of timber harvest.

BECAUSE THE EXTENT OF TIMBER HARVEST AND ASSOCIATED ROAD CONSTRUCTION IS UNDERESTIMATED

The environmental impacts of the Rule are not clear from the Draft Environmental Impact Statement (DEIS). At least 12,100 acres would be subjected to open-pit phosphate mining in 9 roadless areas. The extent of logging and road building appears to have been greatly understated. The estimate of only 800 acres of logging and 4 miles of road per year (DEIS page 62) can hardly be taken seriously. The amount of effort the timber industry and state officials have devoted to bringing forth this proposed Rule tells us the stakes are much higher. A more realistic estimate might be thousands of acres logged per year and logging roads to support it. (Organization, #1698.5.31000.800)

The Backcountry designation offers no real protection for logging, and the Primitive and SAHTS [Special Areas of Historic and Tribal Significance] themes offer less protection than the 2001 Rule. The following lists come from the public viewing maps at various Agency offices on the Clearwater and Nez Perce National Forests [NFs]; they are not comprehensive. Potential new CNF Sales in Roadless Areas: Powell Proper, Lochsa Face IRA [Inventoried Roadless Area] (formerly part of the old Selway Primitive Area), the eastern portion, sale within the proposed Backcountry theme. W to W, Weir Creek, and possibly the Lochsa Face IRAs, sale likely within the proposed Backcountry theme. 12 Breaklands, North Lochsa Face (eastern end), Weir Creek, Rackcliff Gedney, and possibly the Lochsa Face IRAs, sale within the proposed Backcountry theme. Saddle Camp, possibly Weir Creek or North Lochsa Face, sale within the proposed Backcountry theme. NF Breaklands, possibly Mallard Larkins, Siwash, Pot Mountain, and Weitas Creek, IRAs, sale within the proposed Backcountry theme. Possible Resurrection of Old CNF Sales: White Sands, Sneakfoot, and North Fork Spruce IRAs (formerly part of the old Selway Primitive Area) sale within the proposed Backcountry theme. Fern Star, Mallard Larkins, sale within the proposed Backcountry theme. Fuzzy Bighorn, Weitas Creek, sale within the proposed Backcountry theme. Potential New NPNF Sales: Lowell/Selway, Rackcliff Gendey, and possibly O’Hara Creek, sale within the proposed Backcountry theme. Little Slate Creek, Little Slate Creek, John Day, and possibly Little Slate Creek (north), sale within the proposed Backcountry theme. Possible Resurrection of Old NPNF Sales: Cove/Mallard, Mallard and Jersey Jack (Cove) IRAs, sale within the proposed Backcountry theme. These were not analyzed in the DEIS. If they go forth, it would be far more logging on just those two national forests than anticipated in the DEIS for all of the state. (Organization, #1800.46–47.31000.261)

The assessment of impacts in the Draft EIS cannot be taken seriously. It is untenable to say only 800 acres would be logged per year (DEIS, p. 62) and 4 miles of roads built or reconstructed. These exceptions for forest health and fire risk lend themselves to far greater logging. We believe the Forest Service would soon increase the logging in response to local pressures, and you would have 1,600 acres or 3,200 acres per year, and 8 or 16 miles of roads, or much more. (Individual, Baltimore, MD - #6549.5.31000.261)

The proposed Rule is an open invitation to these local interests to put pressure on Forest Service field managers to sell far more timber, justified on grounds of “forest health” or reducing the “significant risk” of fire. If this proposal goes any further, the EIS must be revised to analyze the impacts of a much larger logging program and the roads that go with it. (Organization, #1702.6.31000.260)

BECAUSE THE DEIS MAKES FALSE ASSUMPTIONS ABOUT HUMAN-CAUSED DISTURBANCES

There is a large body of research that indicates logging, roads, thinning, and other human-caused disturbance promote the spread of tree diseases and insect infestation. This science contradicts the assumptions in the DEIS. For example, multiple studies have shown that annosus root disease (*Heterobasidion annosum*, formerly named *Fomes annosus*)—a fungal root pathogen that is often fatal or damaging for pine, fir, and hemlock in western forests—has increased in western forests as a result of logging (Smith, R. S., Jr. 1989. History of *Heterobasidion annosum* in Western United States. pp. 10-16 in Proceedings of the Symposium on Research and Management of Annosus Root Disease (*Heterobasidion annosum*) in Western North America. W. J. Otrosina and R. F. Scharpf, tech. coords. GTR-PSW-116. USDA Forest Service. Pacific Southwest Forest and Range Experiment Station). And researchers have noted that the incidence of annosus root disease in true fir and ponderosa pine stands increased with the number of logging entries (Goheen, E. M. and D. J. Goheen. 1989. Losses caused by annosus root disease in Pacific Northwest forests. pp. 66–69 in Proceedings of the Symposium on Research and Management of Annosus Root Disease (*Heterobasidion annosum*) in Western North America. W. J. Otrosina and R. F. Scharpf, tech. coords. GTR-PSW-116. USDA Forest Service. Pacific Southwest Forest and Range Experiment Station). Large stumps served as infection foci for the stands, although significant mortality was not obvious until 10 to 15 years after logging (Id.).

The proportion of western hemlock trees infected by annosus root disease increased after precommercial thinning, due to infection of stumps and logging equipment wounds (Edmonds, R. L., D. C. Shaw, T. Hsiang, and C. H. Driver. 1989. Impact of precommercial thinning on development of *Heterobasidion annosum* in western hemlock. pp. 85-94 in Proceedings of the Symposium on Research and Management of Annosus Root Disease (*Heterobasidion annosum*) in Western North America. W. J. Otrosina and R. F. Scharpf, tech. coords. GTR-PSW-116. USDA Forest Service. Pacific Southwest Forest and Range Experiment Station; Chavez, T. D., R. L. Edmonds, and C. H. Driver. 1980. Young-growth western hemlock stand infection by *Heterobasidion annosum* 11 years after precommercial thinning. Canadian Journal of Forest Research 10: 389-394). Armillaria—a primary, aggressive root pathogen of pines, true firs, and Douglas-fir in western interior forests—spreads into healthy stands from the stumps and roots of cut trees (Wargo, P. M. and C. G. Shaw, III. 1985. Armillaria root rot: the puzzle is being solved. Plant Disease 69: 826-832). The fungus colonizes stumps and roots of cut trees, then spreads to adjacent healthy trees. Roots of large trees in particular can support the fungus for many years because they are moist and large enough for the fungus to survive, and disease centers can expand to several hectares in size, with greater than 25 percent of the trees affected in a stand (id.). Roth et al. (Roth, L. F., L. Rolph, and S. Cooley. 1980. Identifying infected ponderosa pine stumps to reduce costs of controlling Armillaria root rot. Journal of Forestry 78: 145-15) also noted that Armillaria was present in stumps of old-growth ponderosa pine logged up to 35 years earlier, with the oldest stumps having the highest rate of infection....

Filip (Filip, G. M. 1979. Root disease in Douglas fir plantations is associated with infected stumps. Plant Disease Reporter 63: 580-583) observed that mortality of saplings was significantly correlated to the number of Douglas fir stumps infected with *Armillaria mellea* and laminated root rot (*Phellinus weirii*). McDonald et al. (McDonald, G. I., N. E. Martin, and A. E. Harvey. 1987. Armillaria in the Northern Rockies: Pathogenicity and Host Susceptibility on Pristine and Disturbed Sites. USDA Forest Service. Research Note INT-371. 5 p.) concluded [that] the pathogenic fungus Armillaria had a threefold higher

occurrence on disturbed plots compared to pristine plots at high productivity sites in the Northern Rockies. Those authors also reviewed past studies on *Armillaria*, noting a clear link between management and the severity of *Armillaria*-caused disease. Morrison and Mallett (Morrison, D. and K. Mallett. 1996. Silvicultural management of *Armillaria* root disease in western Canadian forests. *Canadian Journal of Plant Pathology* 18: 194-199) observed that infection and mortality from the root disease *Armillaria ostoyae* was several times higher in forest stands with logging disturbance than in undisturbed stands, and that adjacent residual trees as well as new regeneration became infected when their roots came into contact with roots from infected stumps.

Precommercial thinning and soil disturbance led to an increased risk of infection and mortality by black-stain root disease (*Leptographium wagenarii*) in Douglas fir, with the majority of infection centers being close to roads and skid trails (Hansen, E. M., D. J. Goheen, P. F. Hessburg, J. J. Witcosky and T. D. Schowalter. 1988. Biology and management of black-stain root disease in Douglas fir. pp. 63–80 in *Leptographium Root Diseases on Conifers*. T. C. Harrington and F. W. Cobb, Jr. eds. APS Press. St. Paul, Minnesota). Also another black-stain root disease (*Verticicladiella wagenarii*) occurred at a greater frequency in Douglas fir trees close to roads than in trees located 25 m or more from roads (Hansen, E. M. 1978. Incidence of *Verticicladiella wagenarii* and *Phellinus weirii* in Douglas fir adjacent to and away from roads in western Oregon. *Plant Disease Reporter* 62: 179–181). Witcosky et al. (Witcosky, J. J., T. D. Schowalter, and E. M. Hansen. 1986. *Hylastes nigrinus* (Coleoptera: Scolytidae), *Pissodes fasciatus*, and *Steremnius carinatus* (Coleoptera: Curculionidae) as vectors of black-stain root disease of Douglas fir. *Environmental Entomology* 15: 1090-1095) also noted that precommercially thinned stands attracted a greater number of black-stain root disease insect vectors. Complex interactions involve mechanical damage from logging, infestation by root diseases, and attacks by insects. Aho et al. (Aho, P. E., G. M. Filip, and F. F. Lombard. 1987. Decay fungi and wounding in advance grand and white fir regeneration. *Forest Science* 33: 347-355) saw that mechanical wounding of grand fir and white fir by logging equipment activated dormant decay fungi, including the Indian paint fungus (*Echinodontium tinctorium*).

Trees stressed by logging, and therefore more susceptible to root diseases are, in turn, more susceptible to attack by insects. Goheen and Hansen (Goheen, D. J. and E. M. Hansen. 1993. Effects of pathogens and bark beetles on forests. pp. 175–196 in *Beetle-Pathogen Interactions in Conifer Forests*. T. D. Schowalter and G. M. Filip, eds. Academic Press. San Diego) reviewed the association between pathogenic fungi and bark beetles in coniferous forests, noting that root disease fungi predispose some conifer species to bark beetle attack and/or help maintain endemic populations of bark beetles. Goheen and Hansen (1993) observed that live trees infected with laminated root rot (*Phellinus weirii*) have a greater likelihood of attack by Douglas fir beetles (*Dendroctonus pseudotsugae*). Also, Douglas fir trees weakened by black-stain root disease (*Leptographium wagenarii* var. *pseudotsugae*) are attacked and killed by a variety of bark beetle species, including the Douglas fir bark beetle (*D. pseudotsugae*) and the Douglas fir engraver (*Scolytus unispinosus*) (id.). The root disease *Leptographium wagenarii* var. *ponderosum* predisposes ponderosa pine to several bark beetle species, including the mountain pine beetle (*D. ponderosae*) and the western pine beetle (*D. brevicomis*) (Goheen and Hansen 1993).

A variety of root diseases, including black-stain, *Armillaria*, and brown cubical butt rot (*Phaeolus schweinitzii*), predispose lodgepole pine to attack by mountain pine beetles in the interior west. The diseases are also believed to provide stressed host trees that help maintain endemic populations of mountain pine beetle or trigger population increases at the start of an outbreak (Goheen and Hansen 1993). Grand and white fir trees in interior mixed-conifer forests have been found to have a high likelihood of attack by the fir engraver (*Scolytus ventralis*) when they are infected by root diseases, such as laminated root rot, *Armillaria*, and annosus (Goheen and Hansen 1993). More western pine beetles (*Dendroctonus brevipennis*) and mountain pine beetles (*D. ponderosae*) were captured on trees infected by black-stain root disease (*Ceratocystis wageneri*) than on uninfected trees (Goheen, D. J., F. W. Cobb Jr., D. L. Wood, and D. L. Rowney. 1985. Visitation frequencies of some insect species on *Ceratocystis wageneri*-infected and apparently healthy ponderosa pines. *Canadian Entomologist* 117: 1535-1543). The two species of beetle were more frequently attracted to wounds on trees that were also diseased than to uninfected trees. They also noted that the red turpentine beetle (*Dendroctonus valens*) attacked trees at wounds, with attack rates seven to eight times higher on trees infected with black-stain root disease than uninfected trees. *Spondylis upiformis* attacked only wounded trees, not unwounded trees (Id.). (Organization, #1800.37–42.31000.260)

BECAUSE THE DEIS MAKES FALSE ASSUMPTIONS ABOUT TREE THINNING

The proposed Idaho Rule would allow harmful thinning. Thinning can cause ecological harm and increase fire risk. The Idaho Rule proposes new provisions for forest treatments in the name of forest health and fire risk reduction, but the DEIS does not adequately consider their potential impacts. Thinning does not present the demonstrated benefits for fire risk reduction assumed in the proposal, particularly in Idaho. While thinning appeals intuitively, little empirical evidence exists to support its efficacy, and what we do know presents a cloudy picture marked by uncertainty and potential risk to make fires worse. In the first place, taking wood out of forests can actually promote hotter, faster-burning fires. Aggressive thinning that removes larger trees and reduces canopy closure is a particular problem. It opens up forests to sunlight. That warms and dries the understory, making it more readily burnable. It also promotes rapid ingrowth of flammable young trees and other plants, including non-native species. And all substantial thinning, even just in the understory, increases wind speeds in the forest interior. That both dries out the vegetation and leads to faster spread of wildfire and greater fireline intensity. [Footnote 9: Martinson, E. J. and P. N. Omi. 2003. Performance of Fuel Treatments, Subjected to Wildfires *in* Omi, P. N., note 1. p. 7. U.S. Forest Service. 2000a. Final Environmental Impact Statement for the Roadless Area Conservation Rule (“FEIS”), Volume 1. Online at: <http://www.roadless.fs.fed.us/documents/feis>. p. 3-110. Collins, B. M. et al. 2007. Spatial patterns of large natural fires in Sierra Nevada wilderness areas. *Landscape Ecology* 22:545-557. p. 554. Whitehead, R. J. et al. 2006. Effect of a Spaced Thinning in Mature Lodgepole Pine on Within-Stand Microclimate and Fine Fuel Moisture Content *in* Andrews, P. L. and B. W. Butler, comps., *Fuels Management—How to Measure Success: Conference Proceedings*. 28–30 March 2006; Portland, OR. Proceedings RMRS-P-41. Fort Collins, CO: U.S. Forest Service, Rocky Mountain Research Station. Online at http://www.fs.fed.us/rm/pubs/rmrs_p041/rmrs_p041_523_536.pdf. P. 529. Keeley, J. E., D. Lubin, and C. J. Fotheringham. 2003. Fire and grazing impacts on plant diversity and alien plant invasions in the southern Sierra Nevada. *Ecological applications* 13:1355–1374. p. 1370. FEIS, *supra* this note, Fuel Management and Fire Suppression Specialist’s Report. Online at http://www.roadless.fs.fed.us/documents/feis/specprep/xfire_spec_rpt.pdf. p. 21 (“Fahnstock’s (1968) study of precommercial thinning found that timber stands thinned to a 12 feet by 12 feet spacing commonly produced fuels that ‘rate high in rate of spread and resistance to control for at least 5 years after cutting, so that it would burn with relatively high intensity.’” “When precommercial thinning was used in lodgepole pine stands, Alexander and Yancik (1977) reported that a fire’s rate of spread increased 3.5 times and that the fire’s intensity increased 3 times”); *id.* At 23 (“Countryman (1955) found that ‘opening up’ a forest through logging changed the ‘fire climate so that fires start more easily, spread faster, and burn hotter’”). It is a mistake to conceive of western National Forests as uniformly overgrown thickets in need of thinning to restore prior forest structure and fire regimes. While evidence suggests some lower elevation, dry forests could benefit from restoration treatments, many other sites—particularly higher elevation and wetter forests like those in Idaho—are adapted to intense, stand-replacing fires; and in these dense stands, thinning is contraindicated. [Footnote 10: See Christensen, N. et al. 2002. Letter to President George W. Bush http://docs.nrdc.org/land/lan_07062801g.pdf; Romme, W. et al. 2006. Recent Forest Insect Outbreaks and Fire Risk in Colorado Forests: A Brief Synthesis of Relevant Research. Colorado State University, Fort Collins, CO. Online at http://www.cfri.colostate.edu/docs/cfri_insect.pdf. Schoennagel, T., T. T. Veblen, and W. H. Romme. 2004. The interaction of fire, fuels, and climate across Rocky Mountain forests. *BioScience* 54: 661-676. p. 666. Romme, W. et al. 2003. Ancient Piñon-Juniper Forests of Mesa Verde and the West: A Cautionary Note for Forest Restoration Programs *in* Omi, P. N. and L. A. Joyce, technical eds. *Fire, fuel treatments, and ecological restoration: Conference proceedings*; 2002 16–18 April; Fort Collins, CO. Proceedings RMRS-P-29. Fort Collins, CO: U.S. Forest Service, Rocky Mountain Research Station. Baker, W. L. and D. S. Ehle. 2003. Uncertainty in Fire History and Restoration of Ponderosa Pine Forests in the Western United States *in* Omi, P. N. and L. A. Joyce, technical eds. *Fire, fuel treatments, and ecological restoration: Conference proceedings*; 2002 16–18 April; Fort Collins, CO. Proceedings RMRS-P-29. Fort Collins, CO: U.S. Forest Service, Rocky Mountain Research Station. p. 330.] (Organization, #1824.16–18.31000.260)

3-84 Public Concern: The Forest Service should use the Government Accounting Office methodology for evaluating costs of timber harvest.

On page 1144, a discussion is included which estimates the costs of logging will be reduced under the proposed Rule. This is unsubstantiated. Based on timber and budget analyses, the costs associated with logging in Idaho (especially in Roadless Areas) have been shown to be a net money-loser. If logging is expanded, it is reasonably foreseeable that the costs associated with administration would increase, not decrease. The analysis of economic impacts claims that logging is a moneymaker in the Clearwater and Idaho Panhandle NF, yet this analysis fails to incorporate many associated and off-budget costs associated with the timber sale program. Utilizing the methodology developed by the Government Accountability Office (GAO), a 2001 report found that the Idaho Panhandle NF was one of the top ten money losers in the entire National Forest system (Oppenheimer, J. 2001. In the Red: National Forest Logging Continues to Lose Millions. Taxpayers for Common Sense, Washington, DC.). According to that report, the Idaho Panhandle National Forest's timber sale program cost taxpayers at least \$8.4 million in FY1998, the last year that the Timber Sale Program Information Reporting System report was released. Other studies from the GAO and The Wilderness Society confirm these findings. Finally, the preamble discusses increased logging projections specifically for the Idaho Panhandle NF that are not disclosed in the DEIS or specialist reports. (Preservation/Conservation, Boise, ID - #4156.24.21000.830)

3-85 Public Concern: The Forest Service should identify those Roadless Areas where the lack of high-value timber and difficult terrain limit harvest opportunities.

TO ESTABLISH A CLEARER PICTURE OF THE POTENTIAL IMPACTS OF THE IDAHO ROADLESS RULE

Many of the Roadless Areas exist because of a variety of economic and environmental considerations and impositions. For example, on the Payette Forest many of the Roadless Areas have costly road situations and constraints with low-value timber requiring costly logging system, terrain, and land situations that limit any road or harvest considerations. Identifying these situations would place in perspective the actual chance these Roadless Areas might be lost even without special protection. (Individual, #760.15.62000.2)

3-86 Public Concern: The Forest Service should include an analysis of the impacts of frequent timber harvesting and harvesting of large-diameter trees.

BECAUSE LANGUAGE LIMITING FREQUENCY AND TREE SIZE WAS NOT INCLUDED IN THE DEIS

The 2001 Rule stated the prohibition on timber cutting could be lifted under one of four specified conditions and then added, "[T]he cutting, sale, or removal of timber in these areas is expected to be infrequent." 36 CFR 3273. The Idaho Rule dropped the reference to timber cutting "is expected to be infrequent," to instead allow frequent timber cutting in Roadless Areas. The anticipated frequency of expected timber cutting and its environmental effects must be included in the final Idaho Rule and Idaho Final EIS. The 2001 Rule also stated timber cutting was allowed when, "[T]he cutting, sale, or removal of generally small diameter timber is needed for one of the following purposes and will maintain or improve Roadless Area characteristics as defined in 294.11." The proposed Idaho Rule dropped the reference to "generally small diameter timber," to allow cutting large-diameter timber in Roadless Areas. Will large-diameter trees be permitted to be cut under the final Idaho Rule? If so, the environmental effects must be compared to the 2001 Rule. (Organization, #1693.39.20000.261)

3-87 Public Concern: The Forest Service should include an analysis of the impacts of expanded harvesting that reflects timber industry aims.

BECAUSE THE HARVESTING PROGRAM DESCRIBED IN THE DEIS IS MINIMAL

The Final EIS on the Idaho rule should contain reliable estimates of the real effects on wildlife and wildlife habitat from an expanded logging program reflecting the timber industry's aims, not the minimal program suggested in the DEIS. (Organization, #1698.7.70300.350)

Fire and Forest Health

3-88 Public Concern: The Forest Service should provide an analysis of wildland fire use.

BECAUSE EXCLUSION OF THIS ANALYSIS IS A FUNDAMENTAL FLAW

The DEIS wrongly excludes analysis of wildland fire use. The DEIS is fundamentally flawed from the irrational decision to exclude analysis of WFU [Wildland Fire Use] as a fire and fuels management method. WFU is an ecologically-sound and economically-efficient means of managing fire, reducing fuels, and restoring fire-adapted ecosystems from the negative effects of past fire exclusion. It is a fuels management method especially suited to Wilderness and IRAs [Inventoried Roadless Areas]. The analysis in the DEIS is therefore skewed by the arbitrary exclusion of WFU. (Organization, #1810.4.31000.260)

3-89 Public Concern: The Forest Service should disclose and analyze its policies and plans regarding wildfire management.

TO MAKE CLEAR THAT FUEL REDUCTION EFFORTS WILL BE FOCUSED ON ROADED AREAS

The DEIS failed to disclose that Roadless Areas are a lower priority for fuels treatments. The Fuel Management and Fire Suppression Specialist's Report for the 2001 Roadless Rule stated that, "(T)he amount of high priority fuel management work occurring in Roadless Areas is very small as compared to areas that are essentially roaded. . . . (I)ntinventoried roadless areas would be a low priority for fuel treatment over the next 20 years because higher priority areas are more common outside roadless areas." Indeed, the Forest Service's 2000 Cohesive Strategy disclosed that, "The first priority for restoration will be the millions of acres of already roaded and managed landscapes that are in close proximity to communities." (USFS, 2000b:17) The reason that Roadless Areas are a lower priority is because few Wildland-Urban Interface areas are adjacent to Inventoried Roadless Areas, and Roadless Areas tend to have higher ecological integrity and less wildfire hazards and risks than roaded areas. The DEIS failed to disclose data from the 2000 Roadless Area Rule F[inal] EIS that stated definitively that Roadless Areas have been and will continue to be the lowest priority areas for fuels treatments: "Regardless of whether there is a prohibition on road construction and reconstruction or a prohibition on timber harvest in inventoried roadless areas, the highest priorities for fuel management work will continue to be on NFS [[National Forest system]] lands outside of roadless areas where natural resource values or potential threats to human communities are the highest." (USFS 2000a:3-78)

In accordance with the 2000 Report to the President ("Managing the Impact of Wildfires on Communities and the Environment") and the Forest Service's Cohesive Strategy ("Protecting People and Sustaining Resources in Fire-Adapted Ecosystems"), the 2000 Roadless Rule assumed that fire hazard reduction work would be deferred in Roadless Areas for at least 20 years because that was the estimated time it would take to address the extremely hazardous fuel conditions in roaded areas—and Forest Service personnel believed that being able to do hazardous fuel reduction in Roadless Areas 20 years from now was overly optimistic! Without explanation, the Idaho Roadless Rule analyzed the potential effects of fuels treatments or lack of fuels treatments in Roadless Areas in the next 15 years rather than the 20-year time frame adopted by the 2000 Roadless Rule FEIS. The DEIS failed to disclose the rationale for adopting a shorter time frame that was deemed by the Forest Service in 2000 to be entirely unrealistic for implementing fuels treatments in Roadless Areas. The FEIS needs to disclose that Forest Service fuels reduction efforts over the next two decades or more will concentrate on currently roaded areas where the fire hazard is greatest, commodity resource values are highest, and communities are located. (Organization, #1810.13–14.31000.260)

TO ESTABLISH THE BASIS FOR EFFECTIVE ACTION

The basis for effectiveness of any action to reduce uncharacteristic and unwanted wildfire is not established in the Idaho DEIS. The uncertainty of effectiveness is acknowledged in the Assumptions

Related to Tool section of the Fuel Report, which states, “However, whether mechanical treatments reduce the intensity and severity of wildland fire is disputed and uncertain.” As is stated in the Fuel Report, even if mechanical treatment is permissible in 7.5 million acres of Idaho roadless lands, mechanical treatments are used more often in WUI [Wildland-Urban Interface] than outside of WUI. “IRAs [[Inventoried Roadless Areas]] would be a low priority for fuel treatment because higher priority areas are more common outside roadless areas,” according to the Fuels Report, which is born out in both [the] Idaho DEIS analysis finding only 4.5 percent of Idaho WUI in roadless lands and by the CFPZ [Community Fire Planning Zone] analysis of TWS [the Wilderness Society] showing only 1.2 percent of Idaho WUI in roadless lands. (Organization, #1693.26.31000.262)

TO DISCLOSE THE REASON FOR INCLUDING FIRE AREAS IN REGIME III AS A PRIORITY FOR FUELS TREATMENT AND TO INCLUDE THE EFFECTS OF 2007 WILDFIRES ON FIRE REGIMES AND CONDITION CLASSES

The DEIS failed to disclose the reason fire areas in Regime III were included as a priority for fuels treatments. Fire Regimes I and II were included in the Forest Service’s 2000 Cohesive Strategy as priorities for fuels reduction and restoration treatments. As well, the 2000 Roadless Rule F[inal] EIS included Fire Regimes I and II in its analysis since, logically, these were landscapes most altered by past fire exclusion and tended to have higher Conditions Classes (e.g., CC-2 and 3); and intentionally excluded Fire Regimes III, IV, and V because these were much lower priorities. By including Fire Regime III in the Idaho Roadless Rule DEIS, the Agency has created a problem that it now needs to solve. The Agency may have bolstered its argument on the self-perceived “need” to do fuels treatments in Roadless Areas, but at the expense of giving the public an accurate sense of priorities and potential for success. Given that Fire Regime III is characterized by mixed severity, it is still unclear whether or not high-severity fire effects are “uncharacteristic” or “unwanted” in an ecological sense. The DEIS failed to disclose why it included Fire Regime III in the analysis when this was specifically and logically excluded as an area of concern from the analysis for the 2000 Roadless Rule. Finally, the 2007 wildfires in Idaho likely changed reduced the Condition Classes (e.g., reducing an area from CC-III to CC-II, and from CC-2 to CC-1) in many areas of the landscape, especially [in] Roadless Areas. The FEIS needs to analyze and disclose the effects of the 2007 wildfires on the Fire Regimes and Condition Classes in Idaho’s Roadless Areas. (Organization, #1810.17.31000.260)

TO MAKE CLEAR THE COSTS OF MECHANICAL FUELS REDUCTION

The DEIS failed to adequately disclose the costs per acre of various fuels treatments, especially wildland fire use. The clear intent behind the State of Idaho and U.S. Forest Service in creating the Idaho Roadless Rule is to enable “mechanical fuels reduction,” a.k.a. commercial timber extraction, in Roadless Areas. The ability to construct new permanent and temporary roads is designed to make such logging technically and economically feasible. The analysis of the costs of various fuels reduction methods is skewed by the exclusion of data on the average costs per mile of road construction, but the analysis is also skewed by missing and/or inadequate disclosure of data on the average cost per acre of fuels treatments. The claim in the DEIS that fuels treatments would be more expensive and less efficient to implement without roads ignores prescribed fire and wildland fire use treatments that are far cheaper and less dependent upon roads than mechanical treatments. The F[inal] EIS should include the average costs per acre of various fuels treatment methods, especially wildland fire use and wildfire suppression. We are providing data from the Sequoia/Kings Canyon National Park’s Fire Management Plan which, given the high percentage of Roadless Area with[in] the Park, could be analogous to the costs of fuels management in the Roadless Areas of Idaho. Tool: Mechanical Fuel Reduction Cost per acre: \$1,700/acre Tool: Wildland Fire Suppression (Large) Cost per acre: \$1,300/acre for fires 10 acres Tool: Wildland Fire Suppression (Small) Cost per acre: \$5,900/acre for fires < 10 acres Tool: Prescribed Fire Cost per acre: \$45/acre Tool: Wildland Fire Use (Large Project) Cost per acre: \$87/acre for fires 10 acres Tool: Wildland Fire Use (Small Project) Cost per acre: \$2,600/acre for fires < 10 acres (Organization, #1810.18.31000.800)

TO DISCLOSE THE LEVEL OF SCIENTIFIC CONTROVERSY OVER THE EFFICACY OF COMMERCIAL LOGGING AS A STAND-ALONE MECHANICAL FUELS REDUCTION METHOD

While in the short term (3 to 7 years), the effect of commercial timber removal can be a reduced fire hazard, assuming that cull logs and slash fuels are removed, over the long term (20 to 40+ years) the

indirect effect of commercial logging may actually make the site more flammable than before it was logged. Once a forest is opened-up through logging, increased sunlight, more available water, and less vegetative competition may create an environment that is more conducive to tree, shrub, grass, and forb growth. This early successional vegetative growth often forms into dense thickets that create a highly flammable situation. New tree growth, whether from natural regeneration or planted nursery stock, produces needles and twigs that become the fine fuel that contributes to wildland fire spread. (USFS 2000a:3-92) The Idaho Roadless Rule DEIS failed to adequately disclose the level of scientific controversy over the efficacy of commercial logging as a stand-alone “mechanical fuels reduction” method or as a pretreatment for prescribed burning. (Organization, #1810.16.31000.261)

TO IDENTIFY AND ANALYZE ANY ADVERSE EFFECTS OR ADDITIONAL REQUIRED ACTIONS OF FIRE PREVENTION AND FIRE SUPPRESSION

The DEIS failed to disclose the effects of future fire exclusion and fire suppression in Roadless Areas. The DEIS analyzes the effects of road-building and logging on the ability to prevent and suppress fires in Roadless Areas as if continued fire prevention and fire suppression were beneficial and desired activities. The DEIS failed to adequately disclose the effects on wildlife habitat, vegetation, and fire ecology processes from excluding and fighting fires. Moreover, it failed to analyze and disclose the direct, indirect, and cumulative effects of future fire suppression activities that utilize new roads and fuel breaks in Roadless Areas. The potential adverse effects of wildfire suppression include: felling of wildlife habitat trees, especially snags; dumping of chemical retardants and fuel in streams and soil; soil disturbance and erosion from handlines and dozerlines; sedimentation into streams; wildlife disturbance from motorized vehicles, helicopters, and chainsaws; homogenized fire effects from burnout operations; severe fire effects from backfire operations; scenic impacts from dozerlines and stumps; and alteration of natural fire processes from fire suppression. There may be additional actions and adverse effects of fire suppression which require analysis and disclosure in the FEIS, too. Finally, while the DEIS did disclose the fact that efforts to alter vegetation and fuels to prevent “unwanted” stand-replacing fire in Fire Regimes III, IV, and V are unnatural, it failed to disclose that these efforts would be ecologically (if not also economically) unsustainable over the long term. (Organization, #1810.19.31000.260)

TO CLARIFY WHY CURRENT FEDERAL LAW FAILS TO PROVIDE NEEDED PROTECTIONS

Although the [Nez Perce] Tribe does not question the importance of protecting people and property from wildfire, The Department [of Agriculture], by seeking what it characterizes as “more flexibility” to protect from wildfire, should, at minimum, offer the Tribe and the general public a reasoned analysis detailing how current Federal law fails to provide the needed protections. The Department does not accompany its assertion with evidentiary support—such as documented occurrences, investigative results, comparative studies, or other necessary objective evidence demonstrating that “more flexibility” beyond what the 2001 Roadless Rule (and other Federal law) is, in fact, needed. (Government, #1819.19.31000.260)

TO CLARIFY HOW THE AGENCY PROPOSES TO PROTECT ADJACENT LANDS WITH A PRESCRIBED COMMODITY PRODUCTION EMPHASIS

Based on the Roadless Areas themes that are prescribed, how will the Agency be able to protect adjacent lands that have a plan-prescribed commodity production emphasis? This is not addressed. Fire appears to be the principle perturbation factor that will alter any of the plant covered ecosystems included in most of these Roadless Area themes. This could be true immediately in the systems that are outside of their normal fire condition range. It appears that this document should at least predict several decades of catastrophic fires, and it raises the question without answering [it:] What are the risks that this places on in-holders lands and users of the National Forest lands outside the Roadless Areas? The Agency may not be required to deal with hypothetical situations, but it appears appropriate to assign area-specific risks if the Roadless Plan is adopted. It would appear that people in Idaho should prepare for decades of summers with the air full of thousands of tons of PM 2.5 particulates, more unhealthy air, and areas closed to all uses due to danger from fires. (Individual, #760.12.31000.260)

3-90 Public Concern: The Forest Service should reconsider the use of timber harvest, road construction, and mechanical fuel treatments for forest health purposes.

BECAUSE THE RISKS ARE SIGNIFICANT AND THE BENEFITS QUESTIONABLE

The logging, road construction, and mechanical fuel treatments that would be allowed under the Idaho Roadless Rule would add significant risks and questionable benefits to the integrity of Idaho Roadless Areas. It certainly will not restore the “backcountry” character of the lands! History shows that the least environmentally intact and highest risk landscapes are those where logging has been allowed. These landscapes have the most disturbed fish and wildlife populations, the lowest water quality, the highest invasion rates of exotic species, and the highest levels of human encroachment and disturbance. (Individual, #1482.6.20000.260)

3-91 Public Concern: The Forest Service should rely on scientific evidence when analyzing the relationship between road construction and fire suppression.

BECAUSE ROADS ARE NEITHER NECESSARY NOR SUFFICIENT FOR FIRE SUPPRESSION

The DEIS assumes without disclosing objective, scientific evidence that building roads inside Roadless Area[s] will aid fire suppression efforts. The 2000 Roadless Rule F[inal] EIS disclosed that there are few peer-reviewed scientific articles that discuss the effects of building roads for fire suppression purposes, and most of the available information is anecdotal. (USFS 2000:3-99) The DEIS is making numerous assumptions without providing even anecdotal evidence that building roads for fire suppression will help firefighters control wildfires. Clearly, roads are neither necessary nor sufficient for conducting fire suppression operations: - “Using such suppression resources as smokejumpers and fire crews delivered by helicopters, the current fire suppression organization has been effective in suppressing at a small size approximately 98% of wildland fire starts in Inventoried Roadless Areas. The Agency has a long history of successfully suppressing fires in Inventoried Roadless Areas. This high level of suppression performance is expected to continue.” (USFS 2000a:3-115) - “(A)ccess by road to a wildland fire area does not necessarily mean firefighters will not have to walk long distances in steep, inaccessible terrain to reach the fire.” (USFS 2000a:3-99) (Organization, #1810.8.31000.680)

3-92 Public Concern: The Forest Service should include analysis of the effects of changing the exemptions that permit timber harvest for forest health.

TO PERMIT A COMPARISON OF THE 2001 RULE AND IDAHO ROADLESS RULE

The 2001 Roadless Rule stated exemptions were allowed to the prohibition on logging and road building “in cases of imminent threat of a catastrophic event that might result in the loss of life or property. It does not constitute permission to engage in routine forest health activities, such as temporary road construction for thinning to reduce mortality due to insect and disease infestation.” 36 CFR 3255.

The Idaho Rule changes the exemptions allowing timber harvest from the 2001 Rule but does not compare environmental effects from this change. The Idaho Rule states, “The Forest Service and State do not intend this change in language to be construed as giving permission to build roads in areas designated as Backcountry for the purpose of engaging in routine [[emphasis in original]] forest management activities as shown by the use of the words “significant risk.”

The 2001 Rule stipulation to not engage in “routine forest health activities” is dropped in the proposed Idaho Rule and instead a restriction on “routine forest management” is substituted. The 2001 Rule prohibition on road construction to facilitate routine forest health activities is also dropped in the proposed Idaho Rule, for the Backcountry and General Forest themes.

The 2001 Rule prohibited timber harvest and road construction, and stated why it did so:

“This final rule prohibits road construction, reconstruction, and timber harvest in inventoried roadless areas because they have the greatest likelihood of altering and fragmenting landscapes, resulting in immediate, long-term loss of roadless area values and characteristics.” 36 CFR 3244.

In the environmental effects section of the Idaho DEIS, there is no comparison of environmental effects from forest health activities it permits, specifically, the environmental effects on landscape fragmentation and immediate, long-term loss of Roadless Area values. This comparison must be in the Idaho FEIS to assess effects. (Preservation/Conservation, #1693.38.64300.260)

Water Quality

3-93 Public Concern: The Forest Service should provide an analysis of impacts on water quality.

BECAUSE THERE IS INSUFFICIENT INFORMATION TO ASSESS WATER QUALITY IMPACTS

Based on our review, we are assigning a rating to the Draft EIS for the proposed Rule of Environmental Concerns - Insufficient Information (EC-2). The EC rating is based on the potential for adverse environmental impacts to water quality and aquatic resources, and the need for measures to reduce these impacts. The "2" indicates the Draft EIS does not contain sufficient information to fully assess the environmental impacts from the proposed action. (Federal Agency/Elected Official, Washington, DC, #1692.10.31000.240)

Your assessment of impacts upon watersheds, water quality, and [Section] 303(d) streams from timber harvest, road construction/reconstruction, and mining in Roadless Areas is totally lacking. (Recreation/Conservation Organization, Boise, ID - #1723.56.31000.240)

3-94 Public Concern: The Forest Service should revisit the analysis of the water quality effects from timber harvest, road construction, and wildfire fuel management.

BECAUSE THESE ACTIVITIES ARE LIKELY TO RESULT IN SIGNIFICANT DECLINES IN WATER QUALITY

Objections to the EIS: You state that there would be negligible impact, as I read it, of timbering, road construction, or wildfire fuel management activity on water quality. I have seen the effect of timbering, connected road construction (which would also include your definition of fuel management which appears to involve timbering rather than removal of underbrush), and the streams that were choked with slash and mud. I call this [a] significant decline in quality. (Individual, #11.1.31000.243)

Recreation

3-95 Public Concern: The Forest Service should revisit the analysis of recreation impacts.

BECAUSE THE PROJECTIONS UNDERESTIMATE THE IMPACTS

The preamble contains a discussion of the lack of impacts on recreation in association with phosphate leases. Given the impact of new phosphate leases planned for areas where development is not authorized by the 2001 Rule, we [Idaho Conservation League] do not agree with the assertion that there will be no impacts within the next 50 years on recreational activities. Again the projections, upon which this determination is based, underestimate the potential for development in these areas and constrain the effects analysis contained within the DEIS. (Preservation/Conservation, Boise, ID - #4156.18.21000.423)

3-96 Public Concern: The Forest Service should analyze the impact that national foundation funding of environmental groups has on motorized recreation access to public lands.

Cary Hegreberg in the January 2004 edition of the Montana Contractor News described the current situation as "Montana-based environmental groups that specialize in stopping development generate

millions of dollars each year selling their ‘services’ to out-of-state donors.... Montana certainly doesn’t need to produce any more environmental advocacy than our own residents pay for”. We [Capital Trail Vehicle Association] are concerned about the magnitude and influence of foundation funding to non-motorized organizations. The level of funding provided to non-motorized organizations from national foundations is tens of thousands of times greater than that available to individuals and local organizations representing multiple-use and motorized recreationists. This level of funding provides non-motorized organizations with significant staffing, management, and legal support. Local residents are closest to the land and should have a major say in the way that the land is managed but they cannot counter the influence of the organized environmental groups.

We request the significant impact that national foundation funding to environmental groups has on motorized recreationists be adequately evaluated and considered, including the impact that foundation funding has on the NEPA process, the impact that foundation funding has on the decision-making, and the impact that foundation funding has on the NEPA process through significant use of legal challenges to nearly every decision involving multiple-use proposals for public lands. In addition, the document and decision-makers should evaluate the cumulative negative impact national foundation funding has had on all past NEPA actions involving multiple-use and motorized recreation. (Motorized Recreation, Helena, MT - #168.284.10420.800)

3-97 Public Concern: The Forest Service should evaluate Environmental Justice issues.

TO COMPLY WITH DEPARTMENTAL REGULATION 5600-2

We [Capital Trail Vehicle Association] believe that Federal environmental justice compliance requirements as initiated by Executive Order 12898 should be applied immediately to correct the disproportionately significant and adverse impacts that motorized recreationists have been subjected to. In order to accomplish this we request that this proposed action comply with U.S. Forest Service Departmental Regulation 5600-2 (<http://www.usda.gov/da/5600-2.pdf>).

While some of the guidance published on environmental justice refers to specific minority and low-income populations, the intent of the guidance must be taken in a broader sense as recommended by the EPA in order to avoid discrimination or unfair treatment of any significantly impacted sector of the public. For example, motorized recreationists working full-time plus jobs and simply looking to get away and recreate in the forest on the weekends are pitted against full-time paid representatives for non-motorized interests that are visiting Agency staff on a regular basis during the week. The true popularity of non-motorized recreation is not justly reflected by this influence because it is so heavily funded by foundations and grants yet the Agency is subjected to this influence every day and it is influencing the evaluations and alternatives. Non-motorized interests have gained significant influence over individual and family weekend recreationists because of the advantage that paid representatives and legal counsel and legal action bring.

Foundations versus individuals, families, and the working class are certainly a social and environmental justice issue that must be addressed. These and other socio-economic and environmental justice issues are obvious. The Forest Service is not exempt from the requirement to adequately address these issues in the evaluation and decision [process]. (Motorized Recreation, Helena, MT - #168.150-151.22130.530)

3-98 Public Concern: The Forest Service should include guidance for recreation.

TO ENSURE THAT TRADITIONAL RECREATIONAL MOTORIZED USES ARE NOT AFFECTED

We have little disagreement with the proposed regulations and appreciate the efforts of Idaho’s governors involved in this process to once and for all settle the roadless issues in our great state. We have one serious point of concern from the viewpoint of our sport and that relates more to what the Rule doesn’t say rather than its proposed content. We know with certainty from our discussions with the Governor and his staff that the Rule is not intended to affect in any way the traditional recreational motorized uses of Roadless Areas within the state all of the theme areas. The DEIS clearly states, “Neither the 2001 Roadless rule nor the Idaho Roadless rule provides direction on where and when OHV [[off-highway vehicle]] use would be permissible in roadless areas, therefore, there would be no effect

on current OHV use in Idaho Roadless Areas” (p. 234). However, [the] DEIS Summary does state that the Idaho Roadless Rule provides guidance for Forest Service line officers where they have discretionary authority to influence whether or how an activity may occur (p. 9). This guidance for recreation should be stated in the DEIS and Rule as it was in the Idaho Petition. (Organization, #753.1.31000.530)

TO GIVE DIRECTION TO LAND MANAGERS AS THEY EXERCISE THEIR DISCRETIONARY AUTHORITY

The DEIS and draft Rule fail to state the types of recreation that could occur in the various theme areas as was specified in the Petition. The Petition stated for Wildlands Recreation, “preserves currently existing routes and class of vehicle, further limitations subject to NF [[National Forest]] travel planning.” For Primitive: “a variety of motorized and non-motorized recreation opportunities exist. Campsites may be visible at popular destinations and major trail heads or junctions. Recreation sites accommodate moderate use. Restricted to snowmobiles and motorized vehicles less than 50 inches, change in class of vehicle and designation of new routes is permissible subject to NF travel planning.” Description for these themes in the DEIS give the impression that Wildlands Recreation and Primitive themes favor non-motorized management. Motorized recreation occurs in these themes. In the Primitive theme, use is quite extensive, occurring in 43 percent of the areas. Here is a list: Danskins; Wilson Peak; Cuddy Mountain; House Mountain; Deadwood; Rapid River; Rainbow; Peace Rock; Hells Canyon; Sheep Creek; Red Mountain; Patrick Butte; Lime Creek; Bear Wallow; East Meadow Creek; Steel Mountain; Snowbank; North Lochsa Slope; Ten Mile; Needles; Meade Peak; Smoky Mountains; and Council Mountain. Inclusion of this information in the DEIS and Rule will give clarifying direction to land managers as they exercise their discretionary authority. (Individual, #1468.4.31000.530)

TO ELIMINATE CONFUSION CAUSED BY INCONSISTENT TREATMENT AMONG SECTIONS

Confusion is enhanced by small but perceptible references, or more accurately, lack of references, to recreation in the DEIS. For example, recreation is mentioned in the description of the Backcountry/Restoration and General Forest management themes (DEIS pages 48 and 51), but not in the descriptions of Wild Land Recreation and Primitive management themes (DEIS pages 46 and 47). Finally, in the “Responses to Other Questions Identified during Scoping” section, the DEIS states: How does the proposed rule influence future considerations within these areas, such as travel management? The proposed rule directly affects only allowances for road construction and reconstruction; timber cutting, removal and sale; and discretionary mineral activities. It would not regulate travel management. However, as units engage in travel planning they would likely consider the management themes during the process. (DEIS page 60-) Additional confusion will result from the following section of the DEIS, where it discusses potential changes the Idaho Rule could make to “roadless characteristics”: 6. Primitive, semi-primitive non-motorized, and semi-primitive motorized classes of recreation. Idaho Roadless Areas often provide outstanding dispersed recreation opportunities, such as camping, canoeing, cross-country skiing, fishing, hiking, hunting, picnicking, and wildlife viewing. Although Roadless Areas may have many wilderness-like attributes, Roadless Areas often allow the use of mountain bikes and other mechanized means of travel, unlike wilderness areas. The prohibitions and permissions in the Proposed Action could change the type of dispersed recreation opportunities in Idaho Roadless Areas. (DEIS page 36.) We hope you will understand the value of clarifying that the management themes outlined in the proposed Idaho Roadless Rule are focused only on timber, road building, and mineral management, and not related to recreation management. (Organization, #1801.4.31000.560)

TO AVOID LITIGATION BY SPECIAL INTERESTS

BlueRibbon Questions the Propriety of Dissecting Recreation Analysis from the Idaho Roadless Rule. There is legitimate concern surrounding the decision to excise recreation from the management calculus here. The Idaho Petition included discussion of, and broad agreement [Footnote 2: On December 19, 2006, the RACNAC [Roadless Area Conservation National Advisory Committee] issued a unanimous, consensus-based recommendation that the Secretary direct the Forest Service, with the State of Idaho as a cooperating agency, to proceed with rulemaking (RACNAC 2006a) on various management actions and activities that often occur, and are often controversial, in Roadless Areas. The Idaho Petition’s genius, in our opinion, was that it was as specific as any broad planning guidance could be. The Idaho Petition included “Guiding Principles,” “Desired Conditions,” “Social and Economic Characteristics,” and a discussion of Valid Existing Rights and Adaptive Management for all Roadless lands. When describing each management theme, the Idaho Petition included a discussion of the existing condition,

the desired condition, and each theme's management focus. The Idaho Petition also included specific guidance and tables showing "Suitable Uses and Activities." Such specifics enjoyed broad support by most stakeholders and served to remove any potential uncertainty regarding Roadless Area management. The removal of recreation-specific provisions of the original Idaho Petition does not completely respond to the Purpose and Need and results in a less-than-complete response to issues identified in the Rulemaking process. Lacking the specific guidance from the original Idaho Petition, confusion may now exist as to whether motorized uses may or may not be allowed in certain Roadless Areas. For example, in the original Idaho Petition, on Table 2, it specifically stated that motorized uses can, under certain conditions, be allowed in the Wild Land Recreation and Primitive management themes.

Use/Activity: Yes: No: Notes

Fire management: Yes: Wildland fire use: prescribed fire.

Forest Health: Yes: Prescribed fire for forest health reasons only.

Intensive Timber Management: No: Personal use only.

Grazing: Yes

Motorized Travel: Yes: Preserves currently existing routes and class of vehicle: further limitation subject to National Forest Travel Planning.

Minerals: No: Except leasable, locatable unless withdrawn.

Recreation: Yes: Dispersed.

Road construction and/or reconstruction: No: No roads.

Trail construction and/or reconstruction: Yes

Special Uses: No: Except for uses not deemed an irretrievable commitment of resources.

Weed and/or pest management: Yes: Emphasis on biological control.

Mechanized Equipment use: Yes: Chainsaws, helicopters etc.

BRC [Blue Ribbon Coalition] believes that the Agency may have missed a rare opportunity to utilize the broad consensus expressed in the Idaho Roadless Petition by its removal of specific guidance regarding recreational and other, often controversial, uses. The Agency should attempt to clarify the terms used for management themes lest it leave the Agency open to lawsuits by special interests attempting to define the terms -- on their own terms. (Organization, #1801.5-7.21000.50)

3-99 Public Concern: The Forest Service should include analysis of the impacts of the Idaho Roadless Rule on recreation.

TO CLARIFY IMPACTS OF THE PROPOSED RULE ON BACKCOUNTRY RECREATIONISTS

Despite being the primary users of these lands, neither the proposed Rule nor the DEIS spends much time addressing the impacts of the IRR [Idaho Roadless Rule] on backcountry recreationists. The IRR provides "No measurable differences in dispersed recreation opportunities are expected across alternatives." [Footnote 2: Id at 1143 73 Federal Register 1143 (January 7, 2008) The proposed IRR then advises, "Perceptions of remoteness and solitude may be affected in dispersed recreation areas where timber cutting and road construction occur, but effects are constrained by projected levels of these activities." [Footnote 3: Id] We categorically disagree with the first statement regarding the relative impact of the 2001 Rule and the proposed IRR on dispersed recreation. The qualified nature of the second statement, that effects would be constrained by the amount of ground-disturbing activity that actually occurs, is little consolation. (Organization, #1821.7.21000.510)

3-100 Public Concern: The Forest Service should analyze the cumulative impact of closures of roads to motorized recreation.

We [Capital Trail Vehicle Association] are concerned that the lack of accounting for the cumulative negative impact of all forms of motorized closures over the past 35 years is an undisclosed strategy to squeeze motorized recreationists into the smallest possible area. Once this is accomplished, then the agencies will take the position that the impacts on that small area left for use is significant and

everything will be completely shut down. All of the plans, strategies, actions, and evidence support our concern. (Motorized Recreation, Helena, MT - #168.163.10440.530)

3-101 Public Concern: The Forest Service should provide site-specific analysis for past road and trail closures.

Past actions have closed many roads and trails to motorized recreation and access without addressing the merits of each one. We [Capital Trail Vehicle Association] are concerned with the lack of site-specific analysis for past road and trail closures. Justification has included reasons such as non-system roads or trails, ghost roads, user-created roads etc. that are not site-specific and do not provide adequate justification. The fact is that many roads and trails in use today have been created by visitors going back to the early days of history when all public lands were “open” to motorized access. Agencies cannot select which roads are useful to keep and which are not without a site-specific analysis. The cumulative negative effect of not analyzing each road and trail segment is tremendous. We request that the decision-making be based on the individual and site-specific merits of each travel way. (Motorized Recreation, Helena, MT - #168.312.30000.680)

3-102 Public Concern: The Forest Service should address the issues that affect motorized recreationists.

Many comments by motorized recreationists are being dismissed by the Agency as not being substantive comments because they did not show up on a list of significant issues developed by the Agency. The injustice is that the Agency is not identifying and addressing issues that are significant to motorized recreationists, including the importance of each existing route, cumulative effects of all motorized closures, and need for more not less motorized recreational opportunities. The NEPA process should have been an issues-driven process, and the significant issues for a travel plan should be those that have the greatest impact on motorized recreationists. The Agency is avoiding and selecting issues that circumvent the requirement to address significant issues that affect motorized recreationists. We [Capital Trail Vehicle Association] request that this evaluation address all of the significant issues that affect motorized recreationists. (Motorized Recreation, Helena, MT - #168.7.10430.530)

3-103 Public Concern: The Forest Service should include information regarding snowmobile use in Roadless Areas.

BECAUSE THE FINAL IDAHO ROADLESS RULE SHOULD INCLUDE BETTER SITE-SPECIFIC INFORMATION ON RECREATIONAL USES OF ROADLESS AREAS

Appendix C [in the DEIS] lacks information regarding snowmobile use in Roadless Areas, which is a very popular activity in most of Idaho’s Roadless Areas. Information regarding the grooming of snowmobile trails is also absent. Our point is that better, site-specific, information regarding recreational uses of Roadless Areas should be included in the Final Rule. (Organization, #1801.12.31000.530)

3-104 Public Concern: The Forest Service should revisit the analysis of the effects on scenic quality and recreation.

Objections to the EIS: I have also been backpacking (an activity well suited to Roadless Areas) and found myself confronted by acres of slash that cut across a major trail. We were unable to move through the huge piles of limbs that covered the landscape, unable to find our trail by skirting the area (several miles added to our trek), and a day of following streams to get back to a known area. I call this degradation of recreational activity areas and removal of scenic level to zero. This was in a Roadless Area in North Carolina. You seem to feel that all of your proposed activities would have little effect. (Individual, #11.2.31000.550)

3-105 Public Concern: The Forest Service should disclose the impacts of expanded off-road vehicle traffic under the Idaho Roadless Rule.

The Final EIS should disclose the impacts of expanded off-road vehicle traffic under the Rule. We notice that ORV [off-road vehicle] groups are supporting the Rule on grounds that it favors more

extensive ORV routes. The Final EIS must reckon with the impacts of this change in use. (Individual, Baltimore, MD - #6549.7.31000.530)

3-106 Public Concern: The Forest Service should include plans and definitions for dealing with mechanized development of fragmented lands.

BECAUSE THE DEIS LACKS ADEQUATE PLANS AND DEFINITIONS FOR DECOMMISSIONING, REHABILITATING, AND CLOSING MECHANIZED DEVELOPMENT

Of particular concern to our members [Northern Rockies Chapter of the Sierra Club] are the more than 7.7 million acres of the 9.3 million Inventoried Roadless acres that under Idaho's plan would be subject to logging, road building, and expansion of ORV [off-road vehicle] trails. Within these lands, the Idaho DEIS lacks adequate plans and definitions regarding the decommissioning, rehab, and closure to mechanized development of lands fragmented by roads current or planned under the DEIS categories: "Primitive, Backcountry/Restoration, or General Forest/Grassland-Rangeland." Idaho's roadless lands, however, are threatened by the proposed Idaho Roadless Rule and specifically by the opportunities for resource extraction made available by the presence of the new roads it would allow. As one study revealed, 70 percent of species studied in the Greater Columbia Basin Ecosystem were negatively affected by the presence of roads. (Organization, #1697.2.31000.680)

Cultural Resources

3-107 Public Concern: The Forest Service should revise the Special Areas of Historic and Tribal Significance theme.

TO INCLUDE AREAS SUPPORTING CHARACTERISTICS OF IMPORTANCE TO THE SHOSHONE AND BANNOCK PEOPLE

Although we feel that all unoccupied lands of the United States are important and should be managed to enhance natural ecological processes and preserve existing cultural resources, areas that support the following characteristics are of particular importance to us. Therefore we recommend that these areas be considered as "Special Areas of Historic and Tribal Significance" under the proposed Rule: - The Salmon River country;- High mountain ranges and/or areas with unique geological features;- Pristine or relatively undisturbed native plant communities;- High-quality fish and wildlife habitat or areas that have the potential to support high-quality fish and wildlife habitat;- Areas that support habitat or have the potential to support habitat for rare species native to Idaho; - Other areas with cultural resources important to the Shoshone and Bannock people. (Individual, #205.5.23300.760)

3-108 Public Concern: The Forest Service should exercise caution when sharing information about cultural resources.

TO ABIDE BY TRUST OBLIGATIONS TO PROTECT THIS INFORMATION

P. 256 - 3.13 Cultural Resources

Introduction

"Heritage tourism is one of the fastest growing sectors of the tourism industry, and it is ranked among the top two or three reasons that people take vacations (USDA 1999). In 1994 and 1995, an estimated 123.3 million people visited a historic or prehistoric site in the United States (Cordell et al. 1999)

National Forest System lands contain many of the best preserved sites that remain in the United States, in some of the least disturbed natural settings.

Idaho Roadless Areas are likely to contain a significant proportion of the least damaged cultural resources that occur on NFS lands because of the lack of human-caused disturbance.

Cultural sites on NFS lands can be expected to become increasingly valuable resources that more people wish to visit in the future."

Obviously, the State officials need to have a better understanding of the sensitivity of the information they intend to share in this document, and of the trust obligations of the USFS to protect this type of

information. We might as well put a neon sign out for all of the vandals to see, so they can all go out and use these newly developed roads to get to these undisturbed areas.

As Tribes, we [the Shoshone-Paiute] have continually shared our frustrations with this type of insensitivity. The Tribes have continually struggled to preserve our sites and our beliefs, and it is very disturbing to see what is included in this document. (Tribal Government/Elected Official/agency, #9141.1.30000.760)

3-109 Public Concern: The Forest Service should draft a holistic definition of cultural resources and ensure compliance with the National Historic Preservation Act.

Chapter 3, pg 256. The cultural resource definition is limited to archaeological and historic resources. Drafting a holistic definition of cultural resources will increase the credibility of the next sentence, which states “These resources link people to their cultural history ... ” Recognizing cultural resources beyond historic and archaeological expands the scientific baseline for the affected environment, permitting a more comprehensive analysis of cumulative, direct, and indirect effects on cultural resources.

The National Historic Preservation Act (NHPA) requires the FS [Forest Service] to conduct Section 106 prior to any proposed project, for evaluation of sites for potential nomination to the National Register [of Historic Places]. Furthermore, if a site is evaluated as significant and affected by project actions, then site avoidance is a possible mitigation for adverse effects. Include the word “avoidance” in the last sentence on pg. 256. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.110.21000.730)

Air Quality and Climate Change

3-110 Public Concern: The Forest Service should provide an analysis of impacts related to climate change.

BECAUSE THE DEIS DOES NOT ACCURATELY CONSIDER THE ROLE OF ROADLESS AREAS IN MITIGATING CLIMATE CHANGE

The DEIS does not accurately consider this increased importance of America’s remaining large undisturbed landscapes as critical reservoirs most resilient to the stresses and disturbance regime changes that will likely attend climate change. (Organization, #1824.23.31000.250)

TO INCLUDE A DISCUSSION OF THE SEQUESTRATION OF CARBON IN TREES

One aspect of the Carbon Storage and Climate Change section that was not covered [in the DEIS] was the sequestration of carbon in trees. Carbon remains sequestered when trees are harvested and used in building and other products. It may be released sometime in the future but its rate of release is exponentially different than the forests that are burned under any of the various regimes. (Individual, #760.26.31000.250)

BECAUSE PROTECTED ROADLESS AREAS MAKE GOOD SCIENTIFIC CONTROL AREAS BY WHICH TO UNDERSTAND THE EFFECTS OF CLIMATE CHANGE

I am strongly opposed to any proposal to open up the 9.3 million acres of Roadless Areas in Idaho. In January of 2001, just before President Clinton was out of office there was a broad order from the Department of Interior that told all agencies, including the Forest Service and Bureau of Land Management [that they] should “consider and analyze potential climate effects in their management plans and activities.” Since that time, there has developed a broad consensus that human-induced global warming is a reality, despite the Bush administration’s denial. It is difficult to predict at a local level how plants and animals will respond to increased temperatures, but a reputable source warns of the potential loss of half the world’s species by [the] mid-twenty-first century (M. Novacek, 2007. Terra: Our 100-million-year-old ecosystem - and threats that now put it at risk, 451pp.). Given such a dire prediction, it seems short sighted and foolish to open up Roadless Areas to development. Roadless areas serve as valuable scientific controls for measuring the effects of global warming. In times of change, we

desperately need to understand how we have modified the environment; and this is much more difficult without any control for comparison. (Individual, #285.1.20000.250)

Soils Resources

3-111 Public Concern: The Forest Service should clarify how the soils analysis was completed.

On page 1144, it is unclear how the soil analysis was completed, whether shortcomings or limitations in the process to identify and compare soils was disclosed, and at what scale the analysis was completed. (Preservation/Conservation, Boise, ID - #4156.20.21000.230)

Terrestrial Species

3-112 Public Concern: The Forest Service should evaluate the impacts to terrestrial wildlife.

TO ENSURE PROTECTION OF THE SUBSISTENCE RIGHTS OF TRIBES

The Tribes [Shoshone-Bannock] are concerned that the activities allowed under the GFRG [General Forest, Rangeland, and Grassland] and BCR [Backcountry/Restoration] categories will diminish the ability of these upland species [sage grouse and sharp-tail grouse] to survive and threaten the integrity of contiguous habitat necessary for various life cycles. The USDA [U.S. Department of Agriculture] has not fully considered programmatic goals and objectives within the proposed Rule for the successful preservation and eventual restoration of upland bird habitat. Nor has the USDA implemented, at the programmatic level, proposed management areas for known leks within the IRAs [Inventoried Roadless Areas] that are the subject of the proposed Rule. The Tribes are opposed to the proposed Rule because of the potential impacts to terrestrial wildlife, which comprise a portion of our spiritual and subsistence rights; these impacts are not evaluated in the DEIS. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.92.20000.351)

INCLUDING GRIZZLY BEAR, FISHER, WOLVERINE, ELK, MULE DEER, LYNX, MARTEN, AND MOUNTAIN CARIBOU

We [Idaho Conservation League] are concerned with the potential impacts to terrestrial wildlife species as a result of the proposed Idaho Roadless Rule. We are also concerned about the accuracy of the analysis contained within the DEIS and associated specialist reports.

Specific species that we are concerned with include, but are not limited to, grizzly bear, fisher, wolverine, elk, mule deer, lynx, marten, and mountain caribou. (Preservation/Conservation, Boise, ID - #4156.91.30000.351)

3-113 Public Concern: The Forest Service should analyze effects on greater sage-grouse from development within Roadless Areas.

BECAUSE IT IS A SPECIAL-STATUS SPECIES

Species not adequately analyzed in the DEIS, or covered in the specialist report is [the] greater sage grouse. There is minimal content with regard to the amount of habitat within IRAs [Inventoried Roadless Areas], for example 6 percent of the predicted distribution of greater sage grouse in Idaho occurs within IRAs (BA/BE Report, p. 53). The DEIS points out that sage-grouse is a Forest Service sensitive species and a management indicator species on three of Idaho's National Forests.

With regard to the effects on sage-grouse of potential development within Roadless Areas, the DEIS and specialist report speak vaguely to such impacts. Table 31 indicates that there is a moderate risk to sage-grouse associated with road building, mining, and logging resulting from the proposed Idaho Roadless Rule (BA/BE Report, p. 72). The DEIS and BA/BE Report only go as far as to say that not developing Known Phosphate Leasing Areas would benefit sage-grouse (BA/BE Report, p. 77).

The DEIS lacks the analysis of the potential effects of the alternatives that would foster informed decision making with regard to sage-grouse. There is no discussion of the various habitat types used by sage-grouse within and outside Roadless Areas; no discussion of the cumulative effects of the draft Idaho Rule, in concert with other past, present, and reasonably foreseeable actions; nor a discussion of the cumulative effects of the Idaho Roadless Rule when combined with other Federal, State, and private actions on adjacent lands. (Preservation/Conservation, Boise, ID - #4156.87.31000.351)

3-114 Public Concern: The Forest Service should analyze effects on fishers and wolverines.

TO ENSURE COMPLIANCE WITH NEPA, THE NATIONAL FOREST MANAGEMENT ACT, AND THE ENDANGERED SPECIES ACT

Fishers and wolverines provide good examples of species that could be impacted by the proposed Idaho Rule. The BA/BE Report and DEIS disclose that these and other species could be at moderate to high risk of impacts. The determination is based in large part on the notion [that] only a small portion of their affected habitat is currently proposed for the General Forest management theme.

Little is known about these species; however, their reliance on intact forested ecosystems is relatively well established. Fishers are reliant on structurally complex old-growth forests for denning, and foraging habitat and research is increasingly demonstrating avoidance of areas with high disturbance. Their habitat is characterized by vertically complex forest structures with downed woody material, snags, and closed-canopy forests. As a result of the draft Idaho Rule, components of this habitat could likely be subjected to logging activities in the name of forest health and fuels reduction in areas proposed for General Forest, Backcountry, Primitive and SAHTS [Special Areas of Historic and Tribal Significance] management themes.

The BA/BE Report discloses that approximately 42 percent of existing habitat for wolverines in Idaho is found in Idaho Roadless Areas. These wide-ranging carnivores are known to avoid human activity and disturbance and because of their reliance on roadless lands could be placed at risk as a result of the proposed Idaho Rule. Specifically, fragmentation of habitat through construction of roads and logging in combination with the impacts of climate change and increasing recreational use, especially snowmobile use, have the potential to cause significant impacts to this species. Habitat requirements for denning could be impacted by “forest health” logging which could target the precise habitat components that attract wolverines (i.e., high levels of downed woody debris, structural complexity, and dense forests).

The overriding assumption that the majority of effects will be realized in the General Forest theme is inaccurate considering that 1) many more acres are proposed for the Backcountry management theme; 2) the Backcountry management theme would allow temporary and permanent roads, logging, mining, and other development; and 3) that ground-disturbing activities are also authorized in the areas proposed for the Primitive and SAHTS management themes.

The analysis included in the BA/BE Report fails the test of NEPA, NFMA [National Forest Management Act], and the ESA [Endangered Species Act]. It relies on false assumptions; underestimates risks and effects to Threatened, Endangered, and Sensitive species; and determines that no impacts would occur. These assumptions and estimates are inaccurate, and the shortcomings are not disclosed in the DEIS or BA/BE Report. (Preservation/Conservation, Boise, ID - #4156.97-98.31000.351)

3-115 Public Concern: The Forest Service should analyze effects on flammulated owls.

BECAUSE THEY RELY ON IDAHO ROADLESS AREAS

Flammulated owls are identified in the BA/BE Report at high risk because of their reliance on Idaho Roadless Areas because of habitat loss (primarily as a result of logging). The proposed Idaho Rule, because of allowances associated with logging, road building, and mining, has the potential to increase impacts to this sensitive species. Specifically, impacts associated with forest health logging have [the] potential to make suitable habitat unsuitable. The BA/BE Report also fails to recognize the cumulative effects associated with impacts of pesticides on their prey base during their winter migration. (Preservation/Conservation, Boise, ID - #4156.89.31000.351)

3-116 Public Concern: The Forest Service should analyze effects on special-status species.

TO COMPLY WITH NEPA, THE NATIONAL FOREST MANAGEMENT ACT, AND THE ENDANGERED SPECIES ACT

The DEIS determines that no adverse effects would impact Threatened, Candidate, or Sensitive plant species because the proposed Idaho Rule would not directly authorize ground-disturbing activities. We [Idaho Conservation League] feel that the TECS [threatened, endangered, candidate, and sensitive] Plants Specialist Report and DEIS are not in compliance with the ESA [Endangered Species Act], NFMA [National Forest Management Act], or NEPA. (Preservation/Conservation, Boise, ID - #4156.99.31000.355)

3-117 Public Concern: The Forest Service should revise the analysis of terrestrial habitat and species.

BECAUSE IT LACKS SPECIFICITY, QUANTIFICATION, AND CREDIBLE SCIENTIFIC ANALYSIS

This section [3.9 Terrestrial Animal Habitat and Species] does a good job of describing the importance and value of Roadless Areas to wildlife and TES [threatened, endangered, and sensitive] species. It also does a good job of describing the potential types of impacts to wildlife associated with development of the Roadless Areas. In its discussion of the 2001 Roadless Rule, it provides a rationale for why it is the best alternative for wildlife, wildlife habitat, and TES species. In its summary, the DEIS states:

“Ground-disturbing activities permitted under this alternative include limited road construction/reconstruction and limited timber cutting across the entire 9.3 million acres of Idaho Roadless Areas. Overall, the effects on biodiversity would be beneficial.” With the added prohibition against non-stewardship timber cutting and the limitations on the type and extent of change to existing vegetation, the 2001 Roadless Rule presents a very low risk to terrestrial wildlife resources from habitat loss and fragmentation resulting from timber cutting. Further, other impacts on wildlife species from timber cutting activities, such as disturbance, would be minimal. The 2001 Roadless Rule also prohibits road construction and reconstruction associated with new leases. About 13,400 [acres] of known phosphate deposits are currently not leased and would not be developed, and road access would not be provided for geothermal development. These areas would retain their roadless characteristics and continue to provide undisturbed terrestrial species habitat.”

However, the section fails when it attempts to assess the impacts (cumulative and otherwise) of implementing the IRR [Idaho Roadless Rule]. The rationale is the same as described above for other sections: no direct authorization, similar prescriptions, flat budgets, trust us, and not really doing much. The attempt to place development of the Roadless Areas into a cumulative context with the activities in the non-Roadless Areas fails because it lacks specificity, quantification, and credible scientific analysis. There is no disclosure or convincing argument presented here. (Recreation/Conservation Organization, Boise, ID - #1818.70-71.31000.002)

3-118 Public Concern: The Forest Service should analyze the potential impacts to wildlife and other resources from the loss of roadless characteristics.

In the summary section of the DEIS, there is a table comparing the commodity values of the three alternatives (pg. 20). The last row in the table compares “non-commodity values - acres retaining natural processes and roadless characteristics.” The figures in the DEIS suggest that the 2001 Rule will maintain natural processes and roadless characteristics for all 9.3 million acres of Idaho’s roadless lands, while the proposed action, the Idaho Roadless Rule, will only maintain roadless characteristics and natural process for 3.2 million acres. This means that there would be a 60-percent reduction in natural processes and roadless characteristics from the status quo.

On January 1, 2008, the Forest Service put out an Errata sheet that changed the figures in this table without providing any explanation or rationale. The last row in this table now reads, “non-commodity values - % of Idaho Roadless Areas that would likely maintain natural processes and roadless

characteristics over the next 15 years.” The figures have changed substantially, with the Idaho Rule now showing that it would maintain 99.86 percent of natural processes and roadless characteristics.

How these figures were developed remains a mystery. Why the original table in the DEIS was incorrect has never been explained, and we have little reason to believe the original table in the DEIS was incorrect. The Errata sheet does not invalidate the original information in the DEIS table, and simply presents the information in a new way, inserting the term “likely.” Given the potential for road building and logging in roughly 7 million acres of Idaho roadless lands if the preferred alternative is selected, and the impact that losing roadless characteristics and natural processes for 60 percent of these lands could have, the Forest Service needs to conduct a NEPA analysis that adequately analyzes the potential impacts to wildlife and other resources that this loss of roadless characteristics could have. We have not seen any such analysis, and the Forest Service has not provided any rationale for why a dramatic change in roadless characteristics and natural processes would not impact wildlife. (Preservation/Conservation, #1693.48-49.32000.206)

3-119 Public Concern: The Forest Service should disclose all potential impacts on sensitive species.

INCLUDING IMPACTS ON SPECIES FOUND IN THE AREAS CLASSIFIED AS GENERAL FOREST

On page 1144, the preamble discusses effects to sensitive species. No disclosure is provided as to the uncertainty of presence or absence in Roadless Areas. Little monitoring or research has been conducted on sensitive species and their distribution in Roadless Areas, and the determination that 289 occurrences (species?) are found in the three most protective themes will benefit the species appears to be unsupported. Because the Primitive and SAHTS [Special Areas of Historic or Tribal Significance] themes allow logging activities, the benefits to these species is speculative at best. If 289 of 666 species are found in these more protective theme areas, the inverse is that 377 are found in the General Forest and Backcountry themes. If the determination is that the species would benefit from the Primitive, SAHTS, and Wildland Recreation themes, then the inverse determination is that 377 species would be negatively impacted by the General Forest and Backcountry themes. These impacts are not disclosed. (Preservation/Conservation, Boise, ID - #4156.19.21000.340)

3-120 Public Concern: The Forest Service should consult with the U.S. Fish and Wildlife Service regarding all threatened and endangered species potentially affected by the proposed Idaho Roadless Rule.

Biological Opinions, within the decision-making-process of this EIS, will be required for all Threatened and Endangered Species, as well as any other plants and animals that will be threatened with extinction by the roads and skid-trails, the deforestation, the siltation of creeks, ponds and rivers, the wastes of habitat associated with mining, and the toxic plumes that this EIS will produce.

The UFSWS [U.S. Fish and Wildlife Service] will be required (by law) to consult for each species that will be threatened with extinction by this EIS. Just a quick list of examples of species that will require USFWS consultation is Grizzly Bear, Chinook salmon, sockeye salmon, grey wolf, steelhead and cutthroat trout, bull trout, fisher, wolverine, lynx, caribou, big horn sheep, goshawk, golden and bald eagles, Coeur d'Alene salamanders, Idaho giant salamanders, mink and marten, flammulated and saw-whet owls, hermit thrush, etc. This list is only a part of the entire list of species that this EIS will negatively affect. (Preservation/Conservation, Lenore, ID - #6543.12.31000.025)

3-121 Public Concern: The Forest Service should analyze the impact of the Idaho Roadless Rule on grizzly bear.

BECAUSE THE PROPOSED RULE COULD IMPACT THE SELKIRK AND CABINET-YAAK POPULATIONS

Grizzly bears are listed as threatened under the ESA [Endangered Species Act]. Three distinct populations are found in Idaho and rely heavily on roadless habitat for their survival. While the Yellowstone Population has been delisted and is the subject of litigation, the Cabinet-Yaak and Selkirk Populations are barely meeting population management objectives, if at all. In fact, the Selkirk Population was found as warranted for Endangered status, but precluded because of other USFWS

priorities. Road management standards for the Selkirk and Cabinet-Yaak Populations have also been developed and are being revised in light of litigation that found the standards were developed in violation of NEPA. The Selkirk and Cabinet-Yaak Populations have been subjected to extensive mortality as a result of their relative isolation and small size.

Extensive road networks and habitat disturbance reduce their security, and have been steadily increasing as a result of population growth, development of homes, logging, mining, and other development. Mortality has been documented and the rate of growth has been the subject of controversy with regards to these populations (i.e., whether they have been growing, shrinking, or are stable). Further, hair-snagging surveys conducted by the Forest Service have identified far fewer bears than have been previously estimated. As a result, it is a safe assumption that these populations are under increased pressure, and the cumulative effect of the Idaho Roadless Rule could very likely result in increased disturbance to their habitat. On the Idaho Panhandle National Forest, the proposed Idaho Roadless Rule would designate 16,200 acres in the Selkirks, Kootenai Peak and Katka Peak IRAs [Inventoried Roadless Areas] under the General Forest theme. This would authorize development in core habitat, which is defined as Roadless Areas more than ¼ mile from open roads. Because of the extent of core habitat in these Roadless Areas, the designation of these portions as General Forest could have a significant impact on the survival of the Selkirk and Cabinet-Yaak grizzly bear populations and other Threatened, Endangered, and Sensitive species. What's more, most of the remaining portion of the Katka Peak, a portion of the Selkirks, Saddle Mountain, most of Upper Priest, Continental Mountain, Little Grass Mountain, Blacktail Mountain, Buckhorn Ridge, and others would be designated as Backcountry, which would allow roads and logging to address community risk and forest health. As a result, significant portions of core habitat could be developed for commodity purposes (General Forest) while much of the remaining core habitat could be subjected to roads, logging, and other disturbance, which are known to increase mortality among bears.

While we [Idaho Conservation League] recognize that management standards are currently in place (and are being refined), we are concerned that these standards are inadequate to protect bears and their habitat, and that they are subject to revision and could be weakened in the future. Further, the BA/BE Report (p. 74) fails to instill confidence when it states, "all activities occurring in grizzly bear habitat would likely be designed to meet recovery objectives". (Preservation/Conservation, Boise, ID - #4156.93-94.23600.355)

3-122 Public Concern: The Forest Service should analyze the impact of the delisting of the grizzly bear.

BECAUSE IT IS A REASONABLY FORESEEABLE ACTION

The current analysis does not adequately consider grizzly bear delisting under the Reasonably Foreseeable actions. This action is imminent. At the same time, there is so much emphasis on the management of the area and region as a non-motorized area for grizzly bears. First, we [Capital Trail Vehicle Association] do not feel that OHV [off-highway vehicle] recreation has a significant effect on grizzly bears and, secondly, the analysis must be based on the impending delisting of grizzly bears. Other pending delisting of endangered species must also be considered. (Motorized Recreation, Helena, MT - #168.265.31000.355)

3-123 Public Concern: The Forest Service should clarify how forest fires could affect grizzly bears.

How will unmanaged fire in 70 percent of the land managed by the Forest Service in Idaho affect grizzly bear habitat? Are they able to survive in areas where most of the vegetation is removed? How will burning large portions of the land managed by the Forest Service affect the distribution of grizzly bears and Canadian wolves? Will they move closer to populated areas? (Individual, #1825.13.43000.353)

Aquatic Species

3-124 Public Concern: The Forest Service should revise the analysis of impacts to aquatic species.

BECAUSE THE IDAHO ROADLESS RULE WILL HAVE DIRECT ADVERSE IMPACTS

The DEIS does a good job of describing the types of potential adverse impacts associated with development of the Idaho Roadless Areas to aquatic species such as salmon, steelhead, and bull trout. However, it fails miserably in its actual assessment of environmental consequences of implementing the IRR [Idaho Roadless Rule]. The effects of phosphate mining are relegated to some uncertain, future analysis. Your contention that no adverse environmental effects on aquatic animal species or their habitats would be expected under [the] IRR because it would not directly authorize any ground-disturbing activities is both laughable and deceptively dishonest. This is clearly a “bait and switch” strategy. Your summary of impacts to aquatic species upon implementation of the IRR is not scientifically credible. It is based on convenient opinion, generic prescriptions, discretionary loopholes, low-ball estimates of future budgets and potential development, and abbreviated planning horizons. One of the few trustworthy statements made in this section was in reference to the 2001 Rule: “Overall, the effects on fish habitat and fish species would be beneficial because of the limited amount of disturbance permitted in roadless areas.” (Recreation/Conservation Organization, Boise, ID - #1723.61.31000.352)

BECAUSE NATIVE PEOPLES ARE DEPENDENT ON ANADROMOUS SPECIES

This EIS will affect commercial and Tribal fishing for anadromous fish, which are presently dependent on these Roadless Areas for spawning habitat. Another example of the loss of people’s livelihoods associated with this EIS, which will need to be analyzed at this time. (Preservation/Conservation, Lenore, ID - #6543.18.31000.352)

3-125 Public Concern: The Forest Service should analyze the impacts on native fish species.

TO COMPLY WITH THE “HARD LOOK” REQUIREMENTS OF NEPA

The DEIS failed to take a “hard look” at the effects of the proposed Idaho Rule on native cutthroat trout. (Recreation/Conservation Organization, Idaho Falls, ID - #1649.37.31000.355)

BECAUSE THE U.S. FISH AND WILDLIFE SERVICE IS GOING TO CONDUCT A STATUS REVIEW OF THE BONNEVILLE CUTTHROAT TROUT

Should the Idaho Rule be implemented, it will place these two rare, native fish species [Yellowstone and Bonneville cutthroat trout] at even more risk. While neither species is a listed species, the U.S. Fish and Wildlife Service announced on February 7, 2008, that it would conduct a Status Review of the Bonneville cutthroat trout under the Endangered Species Act to determine if the species warrants listing. (Organization, #1649.39.31000.352)

Botanical Resources

3-126 Public Concern: The Forest Service should acknowledge the different ways noxious weeds are spread.

TO INCLUDE WIND, WATER, AND WILD ANIMALS

Noxious Weeds: In outlining the differences between the 2001 Clinton Rule, the existing Forest Plans, and the Idaho Roadless Plan, the Draft Environmental Impact Statement asserts that there is some potential for spreading noxious weeds. It goes on to assert that the spread of noxious weeds would be limited because of limited road construction, timber harvest, and mining activity. The DEIS estimates 2,600 acres with noxious weed infestations in the GFRG [General Forest, Rangeland, and Grassland management theme].

Noxious weeds are not just spread by road building, timber harvest, or mining. They are commonly spread by wind, water, and wild animals, which is why there are heavy populations of rush skeletonweed in the Mackay Bar area. Mackay Bar is advertised as the “gateway to the Frank Church River of No Return Wilderness.”

Eurasian water milfoil is found in secluded ponds because it is spread by waterfowl.

Another example of the noxious weed infestation in the Frank Church River of No Return Wilderness is found in a 2004 summary of integrated weed management accomplishments in the Frank Church. The report listed 4,360 acres of noxious weeds out of 10,246 acres that were surveyed. Of the total number of acres, 4,281 were within the Wilderness Area and 5,965 acres within 2 miles of the Wilderness boundaries. Wilderness Areas do not allow motorized or mechanical travel, so road building is not a cause. No timber harvest is allowed and mining is limited. Outfitters must buy hay that is certified as weed free for use in the wilderness. Noxious weeds spread by many means, not just road building. (Multiple use or lands rights organization, #1687.5.64100.335)

Social and Economic Concerns

3-127 Public Concern: The Forest Service should clarify how the economic analysis was conducted.

TO ENSURE ALL EFFECTS WERE ACCOUNTED FOR

The jobs analysis on page 1144 states that an additional 80 jobs and \$1.6 million in income will be generated under the proposed Rule, compared with the 2001 Rule. It is unclear whether the analysis incorporated any amenity values associated with roadless protection, i.e. increase in recreation-based income, water quality, scenic values, private property values, etc. It is unclear whether this analysis included the negative economic impacts associated with development of pristine forests, or the loss of recreational access as a result of reduced funding for maintenance of existing roads. According to the Road Trend Analysis [Moore, T., USDA Forest Service, Washington, DC, 2007], likely budget scenarios will force the Forest Service to reduce maintenance and access. As a result, the FEIS should clearly disclose whether, and how new road construction will impact existing road maintenance budgets, and how this could affect resource values, recreation, and economic impacts. (Preservation/Conservation, Boise, ID - #4156.27.21000.800)

3-128 Public Concern: The Forest Service should evaluate the economic value of non-commodity resources such as fish and wildlife.

The economic analysis in this section [3.15 Social and Economics] was flawed. It was constructed to rationalize the Forest Service’s timber program and service to Idaho’s timber industry. The DEIS has failed to objectively evaluate the economic value of non-commodity resources such as fish and wildlife. Economic models and protocols exist to properly value (quantify) these resources and provide an objective basis for comparison. (Recreation/Conservation Organization, Boise, ID - #1818.76.31000.800)

3-129 Public Concern: The Forest Service should prepare a cost-benefit analysis of the Idaho Roadless Rule.

BECAUSE NEITHER THE FOREST SERVICE NOR THE STATE HAS THE FUNDS TO ADDRESS THE IMPACTS OF THE RULE

It would not be productive to rehash details for the well cited concerns over the current maintenance backlog for existing roads, their impacts on erosion and fisheries, their facilitating the spread of noxious and invasive weeds, and their potential for increased frequency of user conflicts. As it currently stands, neither Idaho nor other states are adequately funded to address these vexing problems. Increasing these risks for 5,246,100 acres of Idaho’s roadless country places a longer-term undue burden on taxpayers and would dilute Idaho’s position as premier wildlands destination. A sufficiently comprehensive cost-benefit analysis, including the concerns enumerated above, is needed to assess whether their long-term costs are sufficiently offset by their perceived benefits in the proposed action, or whether greater benefits

result from the stricter compliance with the 2001 RAR [Roadless Area Rule]. (Individual, #5.3.70000.800)

Cumulative Impacts

3-130 Public Concern: The Forest Service should provide an analysis of cumulative impacts.

TO AVOID DEFERRING ANALYSES TO FUTURE FRAGMENTED DOCUMENTS

The heart of this DEIS's inadequacy is best summarized by a statement made by Idaho Governor James Risch and included under "General Analysis Methodology" in the DEIS. The quote from this section reads as follows: "As stated by Idaho Governor James Risch, this proposed Rule "does not cut one tree or plow one road." This paragraph in the DEIS goes on to say, "The proposed Idaho Roadless Rule itself would have no direct environmental effects, and any subsequent activity would need to be individually analyzed before any authorization." (pg. 76) An adequate EIS needs to scientifically analyze cumulative environmental impacts of the entire area impacted, not defer analyses to future fragmented environmental documents. The proposed action would allow new roads to be constructed to new mining projects on over 5.8 million acres of land. However, the DEIS does not analyze impacts from potential new mining or new roads supporting new mining, because it states that new mining may not occur. If it does occur, it commits that each new mine or project will be analyzed individually. The DEIS states that roads are expensive and there probably won't be enough money to build them (further "justification" that they do not need to be analyzed), and whether or not new mines will be economical in the future is not known. (Individual, #749.3.31000.720)

TO COMPLY WITH NEPA REQUIREMENTS

According to the CEQ, "[C]umulative impact is the impact on the environment which results from the incremental impact of the [proposed] action when added to other past, present, and reasonably foreseeable future actions [Footnote 106: 40 CFR [Section] 1508.7]. To comply with NEPA, the Forest Service must "consider" cumulative impacts. To "consider" cumulative effects, some quantified or detailed information is required [Footnote 107: 40 CFR [Section] 1508.25 (c)]. "Where several actions have a cumulative . . . environmental effect, this consequence must be considered in an EIS [Footnote 108: City of Tenakee Springs v Clough, 915 F.2d 1308, 1312 (9th Cir. 1990)]. The DEIS failed to present a full and fair discussion of the direct and indirect environmental impacts of the proposed Idaho Rule. In fact, the Forest Service evidently believes that there are no negative impacts from the proposed action. There appear to have been no studies conducted and no new analysis performed. The lack of "significant" adverse impacts in this DEIS is based on the premise that this is a programmatic EIS and actual impacts will not occur until sometime in the future as individual projects are implemented. This premise is inconsistent with the definition of the word "significant" in the Code of Federal Regulations (CFRs). The definition of "significant" as defined in 40 CFR [Section] 1508.27 includes amongst other things unique characteristics of the geographic area such as proximity to wetlands, wild and scenic rivers, or ecologically critical areas, such as the Blackfoot River. The definition of significant also includes the degree to which an action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration. 40 CFR [Section] 1508.27 also states that significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. (Organization, #1649.109.31000.131)

BECAUSE THE PROPOSED IDAHO ROADLESS RULE PRESCRIBES LAND USES WITH CUMULATIVE EFFECTS

This DEIS prescribes land uses for numerous areas that have unique characteristics; it establishes a precedent for future actions with significant effects; and it will result in a decision in principle about future management; and it is reasonable to assume cumulatively significant impacts on the environment from activities precipitated by the proposed Idaho Rule.

The DEIS fails to account for the direct and indirect impacts of the proposal, which makes it inherently impossible for the agencies to then claim that they have included an accounting of the cumulative impacts of the proposed Idaho Rule. Further, the proposed rule prescribes land uses that have cumulative

effects, yet there is no cumulative effects analysis in the DEIS. (Recreation/Conservation Organization, #1649.110.31000.131)

3-131 Public Concern: The Forest Service should analyze the cumulative impacts of the Hardrock Mining and Reclamation Bill.

A major Congressional effort is underway to enact reform of the Mining Law of 1872. The Hardrock Mining and Reclamation Bill, which passed the House of Representatives in 2007, would increase the acreage of lands off-limits to exploration and development. Wilderness Study Areas, lands recommended for Wilderness designation, sacred sites, Areas of Critical Environmental Concern, Inventoried Roadless Areas, lands in the Wild and Scenic River System or recommended for such, and lands administratively withdrawn or segregated would be off-limits to mineral exploration and development. Operations permitted before bill passage would be grandfathered. In light of the impact of this proposal on Idaho Roadless Areas, the F[inal] EIS should discuss cumulative impacts of this legislation and the impacts that it would have. (Preservation/Conservation, Boise, ID - #4156.119.31000.130)

3-132 Public Concern: The Forest Service should consider the cumulative impacts of restrictions on motorized access.

The cumulative negative effects of more restrictive travel plan decisions include the concentration of use on fewer miles of road and trail, such that traffic density is increased and recreation enjoyment is reduced. As shown in Table 2 [ATT 9], the magnitude of this impact is significant and yet it is ignored. To experience the cumulative effects of motorized closures first hand, one can visit the Whitetail-Pipetstone area on Memorial Day and Copper Creek near west of Phillipsburg on July 4th and see hundreds to thousands of multiple-use recreationists forced into small areas with limited opportunities by the cumulative effects of many motorized closures produced by Forest Plans and travel plans. Travel decisions affecting public lands that restrict motorized recreation in one area may consequently increase motorized use in another where site-specific travel plans are not yet in place. Cumulatively then, this “leapfrog” effect may increase resource damage, create more law enforcement problems, generate discord between motorized and non-motorized recreationists, and make future site-specific travel planning more difficult. This cumulative negative effect must be adequately considered as part of this project. (Motorized Recreation, Helena, MT - #168.114.22300.530)

3-133 Public Concern: The Forest Service should include all areas under its jurisdiction in its impacts analysis.

TO ADEQUATELY ADDRESS CUMULATIVE AND GLOBAL CLIMATE CHANGE IMPACTS

The USFS, by not including areas that are supposed to be covered by travel management plans and the Forest Plans, will not be able to adequately address cumulative impacts and global climate change impacts if it does not include all areas under their jurisdiction. (Tribal Government/Elected Official/agency, Plummer, ID - #1696.16.22300.002)

3-134 Public Concern: The Forest Service should analyze the cumulative impacts of grazing, travel management, and wildland fire.

The proposed action does not address grazing, travel management, or wildland fire use. Management related to these activities would be regulated by other existing regulatory and analytical processes (for example, travel planning.) This is another example of failure to properly integrate other management activities with those of a specific IRR [Idaho Roadless Rule] theme. There is no disclosure here. How would you evaluate cumulative impacts in a roadless watershed subjected to grazing, timber harvest, mining, and road construction? Regulatory and analytical processes vary by [National] Forest and Forest Plan. Where is the common thread in this analysis? You have ignored these critical issues in your process. (Recreation/Conservation Organization, Boise, ID - #1723.27.31000.160)

Native American Tribal Issues

3-135 Public Concern: The Forest Service should initiate nation-to-nation agreements with the Native American nations.

BEFORE INITIATING ACTION THAT WOULD AFFECT TREATY RIGHTS

There is a well-recognized native people's (Nez Perce, Shoshone, Coeur d'Alene, Kootenai, Kalispell, Flathead, Piute, etc, to name a few Tribes with Treaty rights to these areas) interest in these areas retaining their value as wildlife habitat. These interests would be thwarted or impacted by implementation of this EIS. All people living here in Idaho, and all of our descendants, will benefit from these people's ancestors, who fought for and won Treaty rights to wildlife stewardship (rights that have been taken away from the rest of us). The proponents to this EIS are required to initiate nation-to-nation agreements between the US of America and each of these native nations, before initiating the actions that will destroy their existing Treaty rights. (Preservation/Conservation, Lenore, ID - #6543.19.30000.150)

3-136 Public Concern: The Forest Service should maintain National Forests for Tribal members in a sustainable manner.

BECAUSE IT HAS A STATUTORY MANDATE TO DO SO

The Tribes [Shoshone-Bannock] will provide both general and specific comments to address fundamental flaws with the proposed Rule and the rationale behind the DEIS management themes. The Tribes remind the USDA [U.S. Department of Agriculture] of their statutory mandate to maintain the National Forests in a sustainable manner in perpetuity for Tribal members using the Forest, taking into consideration the impact on Treaty [Fort Bridger Treaty of 1868] resources, Tribal subsistence, and impacts to traditional cultural practices [Footnote 10: 16 USC 1600 [Sections] 2(6) (the Forest Service, by virtue of its statutory authority for management of the National Forest System, research and cooperative programs, and its role as an agency in the Department of Agriculture, has both a responsibility and an opportunity to be a leader in assuring that the Nation maintains a natural resource conservation posture that will meet the requirements of our people in perpetuity)]. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.41.22116.040)

3-137 Public Concern: The Forest Service should analyze the effect of the proposed Idaho Roadless Rule on Tribal lands and members.

TO COMPLY WITH EXECUTIVE ORDER 12898

Executive Order 12898 requires that an analysis, under the ambit of environmental justice, be performed that specifically looks at the impact to Tribal subsistence rights by the proposed Rule. In accordance with Executive Order 12898, the Tribes [Shoshone-Bannock] demand further analysis of the impacts to subsistence rights. (Tribal Government/Elected Official/Agency, Fort Hall, ID - #6546.35.22130.150)

BECAUSE THEY USE ROADLESS AREAS FOR HUNTING, GATHERING, AND RELIGIOUS PURPOSES

The proposed Rule also stated on pg. 1151 that: "the Department [[of Agriculture]] has assessed the impact of this proposed rule on Indian Tribal governments and has determined that the proposed rule does not significantly affect or uniquely affect Indian Tribal government communities." Although the Rule may not affect Tribal government communities, whatever that means, it does significantly affect the Tribal members who utilize these lands for substance and religious purposes. We consider this as an unacceptable oversight by the Forest Service considering we are afforded off-reservation treaty rights to hunt, fish, and gather natural resources on unoccupied lands of the United States and the fact that these lands are of the highest spiritual and religious significance. (Individual, #205.3.31000.150)

BECAUSE CONCERNS REGARDING TRIBAL TRUST RESOURCES REMAIN UNRESOLVED

The Tribe appreciates the State of Idaho's acknowledgment that the Tribe identifies as culturally and spiritually significant many areas that will likely be affected by the Rule. Specifically, the Tribe was

pleased to see the creation of a separate management theme that provides strong protections for areas of Tribal cultural and spiritual significance. However, protection of some areas that are culturally and spiritually significant to the Tribe addresses only one of the myriad concerns the Tribe has expressed to the Forest Service and State of Idaho regarding the potential implications of this Rule on Tribal trust resources on NFS [National Forest System] lands within the ceded territory. As of the date of this letter, unfortunately, most of the Tribe's concerns regarding the Rule's relaxed restrictions on timber cutting and road building in Roadless Areas within the ceded territory remain unresolved. These outstanding concerns, and other issues, have led the Tribe to conclude that the proposed Rule does not provide sufficient watershed and habitat protections necessary to safeguard the Tribe's reserved rights guaranteed under the Treaty of 1855. (Government, #1819.3.22120.200)

BECAUSE IMPACTS TO TRIBAL SUBSISTENCE RIGHTS MUST BE ANALYZED

Executive Order 12898 requires that an analysis, under the ambit of Environmental Justice, be performed that specifically looks at the impact to Tribal subsistence rights by the proposed Rule. In accordance with Executive Order 12898, the Tribes [Shoshone-Bannock] demand further analysis of the impacts to subsistence rights. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.35.22130.150)

BECAUSE IMPACTS RESULTING FROM A CHANGE IN MANAGEMENT MUST BE ANALYZED

The DEIS failed to address Tribal impacts resulting from the change in management under the proposed Rule and therefore, site-specific impacts to each Forest and each Roadless Area within that Forest should be analyzed. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.28.31000.002)

BECAUSE IMPACTS ON TRIBES WITHIN INVENTORIED ROADLESS AREAS MUST BE ANALYZED

In terms of the adequacy of the analysis for each IRA [Inventoried Roadless Area], the proposed Rule is lacking any depth or even a clear baseline for evaluating Tribal impacts within IRAs. Every IRA in Idaho needs further ethnographic and archaeological research that will focus on Tribal use as a whole. Evidence of Tribal presences is reflected in many IRAs throughout the State of Idaho and beyond its political boundaries. The DEIS uses language like: evidence of human activity is moderate; however, there is no discussion of pre-historical or historical Tribal presence. It is the USDA's [U.S. Department of Agriculture's] obligation to provide adequate information regarding Tribal uses, both past and present, so that a reasoned decision can be rendered. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.29.31000.760)

**BECAUSE IMPACTS ON TRIBAL CULTURAL RESOURCES WITHIN
INVENTORIED ROADLESS AREAS MUST BE ANALYZED**

The DEIS does not provide sufficient baseline information regarding Tribal cultural resources in IRAs [Inventoried Roadless Areas]. Not only are these our aboriginal lands but these IRAs continue to provide cultural identity to present day Shoshone and Bannock people. The FS [Forest Service] should contract with the Tribes to develop ethnographic studies, which will provide adequate baseline information for analysis. The Tribes and FS have limited ethnographic information that can be used to evaluate the direct, indirect, or cumulative impacts to cultural resources within IRAs, as much of the studies have been conducted along watercourses [Footnote 11: The Rivers and Fisheries of the Shoshone-Bannock Peoples} Albers et al. 1998. The Rivers and Fisheries Report focuses on the Tribes' utilization of watercourses in Idaho and provides valuable ethnographic data from Tribal members. However, this report does not include data that can be utilized for accurately evaluating impacts to cultural resources within IRAs].

Cultural resources, as narrowly defined in the DEIS, are "historic and archeological sites, historic structures and buildings." The Shoshone Bannock Tribes expand upon this definition of cultural resources and include all elements of mind, spirit, and physical being tied to the physical landscape. Examples include archaeological sites, historic sites, traditional cultural practices, spiritual beliefs, sacred landscapes, intellectual property, subsistence resources, language and oral tradition, place names and tribal cultural geography. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.42.31000.760)

3-138 Public Concern: The Forest Service should give more weight to the management theme requests of the Nez Perce Tribe.

BECAUSE MOST AREAS IDENTIFIED BY THE TRIBE AS REQUIRING PROTECTION WERE NOT CATEGORIZED AS SUCH

Governor Risch responded to the [Nez Perce] Tribe's letter on September 12, 2006. He stated that based on the Tribe's concerns he would recommend that the Petition be changed to provide further protections to culturally significant areas to the Tribe. The Tribe wrote to Governor Risch on November 29, 2006, thanking him for changing the management prescription for three areas that the Tribe identified. However, the Tribe was also very clear that that it was disappointed that Governor Risch declined to adopt the Tribe's request to maintain existing protections from logging and road building in most of the specific Roadless Areas that the Tribe identified as critical. Moreover, the Tribe expressly noted that these areas are particular examples only, adding that the Tribe would prefer that all remaining Roadless Areas remain roadless, with little active management, given the already high level of management and development of the roaded areas within the State of Idaho. (Government, #1819.7.10300.600)

BECAUSE HABITAT THAT SUPPORTS TREATY-PROTECTED RESOURCES WILL BE AFFECTED

The "Backcountry/Restoration" management theme will affect hundreds of thousands of acres of habitat that supports Treaty-protected resources. Although the [Nez Perce] Tribe does not support the Rule because it stands to negatively affect hundreds of thousands of acres of ceded territory, the Tribe has nevertheless provided the Forest Service and the State of Idaho with a list of areas in Roadless Areas within the ceded territory that are of particular concern to the Tribe and therefore warrant the highest possible watershed and habitat protections. (Government, #1819.29.23500.150)

3-139 Public Concern: The Forest Service should consider the Shoshone and Bannock people in the proposed Idaho Roadless Rule and in the EIS.

BECAUSE NO LANDS OF IMPORTANCE ARE IDENTIFIED UNDER THE SPECIAL AREAS OF HISTORIC OR TRIBAL SIGNIFICANCE THEME FOR THE SHOSHONE AND BANNOCK PEOPLE

Our first and most important comment is that it is obvious that the proposed Rule and Environmental Impact Statement (EIS) did not consider the interest of the Shoshone and Bannock people who occupied these lands since time immemorial. We say this because there are no lands of importance identified under the "Special Areas of Historic or Tribal Significance" for the Shoshone and Bannock people. (Individual, #205.2.23300.40)

3-140 Public Concern: The Forest Service should revise the EIS to include an ethnographic study.

TO ANALYZE THE EFFECTS ON THE SHOSHONE AND BANNOCK PEOPLE

The EIS and specialist reports lacked any ethnographic information to make a thorough analysis of the impacts on the Shoshone and Bannock people to make an informed decision. This is required by the National Environmental Policy Act; therefore, we recommend the EIS be supplemented to analyze effects based upon an ethnographic study of the Roadless Areas and to develop acceptable management alternatives for these lands. We also recommend that the proposed Rule be modified to incorporate the areas identified from ethnographic analysis. (Individual, #205.4.31000.131)

Intrinsic to the relationship between Tribal people and the natural environment is the simple desire to protect, preserve, and where necessary the enhancement of the component features of the natural landscape. From this relationship, cultural heritage and life ways are defined for Tribal people. Not included in the DEIS are the empirical data from ethnographic and archaeological records documenting Tribal procurement areas and landscape attributes for the location of residential camps. Resource areas and the spatial distribution of camps characterize the land use patterns of the Tribes, showing that Tribal [Shoshone-Bannock] use was present in virtually every IRA. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.44.31000.760)

The following are examples of existing ethnographic data that was not included in the DEIS:

In the central Idaho Mountains, Shoshone people identified themselves as Tukadeka (Sheepeaters) and Agaidika (Salmon Eaters). These Tribal bands people utilized the mountain sheep [and] salmon as primary subsistence resource [Footnote 12: 12 Walker, D. E. 1993. Lemhi Shoshone-Bannock Reliance on Anadromous and Other Fish Resources. Northwest Anthropological Research Notes Vol. 27 (2), pp. 215–50]. Historical accounts by Lewis and Clark describes procurement of salmon by Shoshone people occurring on the Salmon, Lemhi, Boise, Payette, Weiser, [and] Snake Rivers in Idaho. The Virginia City Treaty reserved a homeland in the Lemhi River Valley for the Shoshone, Bannock and Sheepeaters people in Central Idaho. This reservation was eventually terminated and the Indian residents removed to the Fort Hall Reservation.

The Tribes [Shoshone-Bannock] retain significant ties to the Lemhi Valley and Central Idaho, continuing to utilize these areas for subsistence and traditional cultural practices. The Tribes consider all lands within the original boundary of the Lemhi Valley Reservation as significant and valuable. The Indian residents of the reservation established homesites, ranches, [and] schools, [and] continued social and economic trade which contributed to the historic fabric of the Salmon region. In fact, the Indian cemetery remains important to the families of the former residents and continues to be a focal point. Many of the place names for streams and mountains are reflective of the presence of the Indian people. The Lemhi Valley is also nationally significant in that it was the birthplace and homelands of Sacajawea. The recently established national trail for the Lewis and Clark Expedition traveled over the Bitterroot Mountains into the Agency Creek IRA [Inventoried Roadless Area] and continued westward. This is an important Tribal historical area, and must be protected from any further developments. The Cache Valley Shoshone called themselves Pangwiduka, and Tribal oral history identifies the Bear River area in southeastern Idaho as a significant trading rendezvous and resource procurement area for various bands of Shoshone and Bannock peoples. The foothills and mountains surrounding the Bear River drainage, in the Caribou portion of the CTNF [Caribou-Targhee National Forest] provided subsistence opportunities for the bands of the Shoshone and Bannocks of this area. It was also a major transportation route for historical trade for Indians and trappers. [The] Bear River drainage was considered a major subsistence fishery for Bonneville cutthroat trout. [Footnote 13: Albers, Appendix A-161] Due to the extremely limited Tribal ethnographic information, the Tribes request that additional studies be completed to determine impacts to Tribal historical use areas, from which further analysis can be completed.

Clark maps common resource areas utilized by Shoshone and Bannock people and documents the importance of riverine resources, and the surrounding mountains, which include a high density of known Shoshone and Bannock campsites [Footnote 14: Clark, S. F. 1986, Nineteenth Century Shoshone-Bannock Riparian Adaptation, unpublished Master's thesis, Idaho State University, Pocatello, Idaho]. The spatial distribution of these camp locations characterizes the land use patterns for Tribal people. Moreover, Clark and Steward's studies highlight the significance of riverine habitat for subsistence and campsite locations. [Footnote 15: See Clark, 1986. and Steward, Julian, 1938, Basin-Plateau Aboriginal Sociopolitical Groups. Smithsonian Institution Bureau of American Ethnology Bulletin No. 120. Government Printing Office, Washington, D.C.]

The absence of baseline ethnography in the DEIS fails to indicate the importance of riverine resources and their Tribal significance as cultural properties. Tribal identity is still tied to the riverine environment and to the areas within the surrounding IRAs. Tribal knowledge and stewardship of traditional cultural practices, such as hunting and gathering, is privileged information and remains the responsibility of present generations of the Tribes to continue the unique heritage of the Shoshone and Bannock people.

Persistent in our Tribal teachings is to return to our aboriginal resource areas to continue the rich heritage of the Shoshone and Bannock peoples. Tribal identity continues to be defined by practicing traditional lifeway, regardless of the modern reality of current land management. Traditional cultural practices, which mirror the images of our ancestors [by] hunting and gathering in the same location as our ancestors, have remained for millennia. During the early reservation days when ration food was scarce, Shoshone and Bannock people left the Fort Hall Reservation and returned to aboriginal lands to supplement food resources [Footnote 16: Lilljeblad, Sven, 1972, The Idaho Indians in Transition, 1805–1960. Idaho State Museum. Pocatello, Idaho] Lilljeblad's research indicates that the Shoshone and Bannock cultures are at least 8,000 years old in their aboriginal range. Research shows salmon is a

significant primary resource along with terrestrial wildlife, resident fish, roots, berries and other botanical resources. Lilljeblad states, “A culture existence is dependant on the continuity of interconnected knowledge, beliefs, conventional behavior and technical practices” [Footnote 17: Id at pg. 79]. Continuation of cultural practices in modern day, requires “the use of technical innovation combined with essentials of own aboriginal tradition” [Footnote 18: Id at pg. 15]. This tradition Lilljeblad speaks of is the current Tribal exercise of Treaty [Fort Bridges Treaty of 1868] rights and traditional cultural practices; including the use of riverine resources, which are included in the IRAs.

The archaeological record illustrates the aboriginal lands of the Shoshone and Bannock peoples. Site 10BK26 (Wahmuza Site, located on the Fort Hall Reservation) provides scientific evidence of continual occupation of the Shoshone and Bannock people for the past 4,000 years in the Fort Hall Bottoms. The Wahmuza Site is a significant site in many ways for the Shoshone and Bannock people. Holmer [Footnote 19: Holmer, Richard N. 1986a, Excavation at Wahmuza. *In* Shoshone-Bannock Culture History, edited by R. N. Holmer, pp. 39-204. Swanson-Crabree Anthropological Research Laboratory Reports of Investigations 85-16. Idaho State University, Pocatello] utilizes the direct historical approach, and the artifact assemblage from 10BK26 identifies specific artifacts as Shoshone.

The research goal was to preserve and supplement the archaeological and anthropological research of traditional Shoshone knowledge providing empirical basis for Tribes presence in this region [Footnote 20: Wright, Steven E. N. D., The Spatial and Temporal Distribution of the Wahmuza Lancelot. Idaho State University, Pocatello, Idaho]. The Wahmuza knife/projectile point artifact identified at 10BK26 is associated only with the Shoshone people. The spatial distribution of the Wahmuza point demonstrates the importance of riverine environments in central and southeastern Idaho to the Shoshone and Bannock people. The Wahmuza spatial distribution indicates Tribal presence in the central mountains and rendezvous areas of Bear River and Camas Prairie [Footnote 21: Wright - No Date]

Archaeological and ethnographic research documents the aboriginal land use of the Shoshone and Bannock people. Research provides an interpretation of land use patterns and supports Tribal oral history. Every IRA in Idaho needs further ethnographic and archaeological research that will focus on Tribal use as a whole. In order for the USDA [U.S. Department of Agriculture] to make a reasoned, final decision, an adequate baseline for ethnographic information must be established for analysis and determination of appropriate mitigation.(Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.45-49.31000.760)

Use of Best Available Science

3-141 Public Concern: The Forest Service should clarify whether they used the best available science as required by NEPA.

The Draft EIS does not indicate whether the best available science from all Federal agencies that have expertise concerning fisheries, hydrology, old growth, and wildlife relating to the roadless issue was used, as required by NEPA. (Organization, #1694.1.32000.300)

3-142 Public Concern: The Forest Service should base the proposed Idaho Roadless Rule on the determinations of subject-area experts and scientists.

TO AVOID PROBLEMS CREATED BY IGNORING EXPERTS AND SCIENTISTS

Nearly every one of the problems [fire and/or insect events] was caused by ignoring the expert’s projections and predictions, resulting in problems with untreatable and undesirable outcomes. This Rule encumbers the needed response actions even more unless allowances are made to deal with this problem. (Individual, #762.3.20000.260)

3-143 Public Concern: The Forest Service should determine scientific parameters required for adequate analyses.

BECAUSE SCIENTIFIC PARAMETERS SPECIFYING THE IMPACTS OF FRAGMENTATION AND LOSS OF CONNECTIVITY ARE LACKING

The DEIS does not determine the scientific parameters that specify the effects of landscape fragmentation and loss of ecological connectivity on the areas open to “Stewardship” practices nor how those effects will be reversed. (Organization, #1697.3.31000.331)

3-144 Public Concern: The Forest Service should retain the 2001 Roadless Area Conservation Rule.

BECAUSE THE SCIENTIFIC FINDINGS OF THE FINAL EIS INDICATE RETENTION

The scientific findings indicate the need to keep the 2001 Roadless Area Conservation Rule. The following information is found on pages 1-3 and 1-4 of Chapter 1 [in the U.S. Department of Agriculture Forest Service Roadless Act Conservation Final EIS]. “As with aquatic species, inventoried roadless areas function as biological strongholds and places of refuge for many terrestrial animal species from wide-ranging large mammals, such as grizzly bears, to narrowly distributed bird species, and other small animals such as snails. As such, these areas play an important role in helping to conserve native plant and animal communities and biological diversity. When roads divide large landscapes into smaller patches, populations may become isolated from each other. This reduces genetic mixing, which is necessary for species diversity and health (Noss and Cooperider 1994). In evaluating 91 vertebrate species in the Interior Columbia Basin, Wisdom and others (2000) found that factors associated with roads negatively affected over 70% of those species. These negative effects include loss of large trees and logs needed by cavity dependent birds and mammals, direct and indirect species mortality, and reductions in breeding productivity.” (Organization, #1694.13.20000.310)

3-145 Public Concern: The Forest Service should ensure that sufficient background data are collected.

TO QUANTIFY THE EXISTING CONDITIONS

Positive impacts to the environment in areas such as fisheries, wildlife habitat, sediment reduction, and noxious weeds are largely based on personal judgment or predictive models. These models are not calibrated or based on data from the study area. All models are wrong, so honest modelers first report the expected uncertainty of the model and then the predictions. There are no case histories and very little data to back up any of the predictions.

All too often actions have been enacted based on [a] proclaimed benefit to the environment and without any tangible evidence or follow-up monitoring to document whether proclaimed benefits occurred or not. All too often these same actions have produced significant negative impacts on multiple-use interests. Significant recreational opportunities have been taken from multiple-use and motorized recreationists based on theoretical environmental improvements that may never happen. This lack of accountability is not acceptable.

We [Capital Trail Vehicle Association] request that sufficient background data be collected to quantify the existing conditions in the resource area of interest. Then, if a motorized closure is enacted, sufficient data should be collected to demonstrate whether or not there was significant improvement to each resource area. If significant measurable improvement cannot be demonstrated, then, in order to be accountable, motorized closure actions should be reversed. In other words, the public needs to know how the decision [was] made, the data on which it was based on including the source, and whether the data was adequate to substantiate the claimed environmental improvements.... (Motorized Recreation, Helena, MT - #168.223.13000.530)

3-146 Public Concern: The Forest Service should require independent scientific review of all planning and analysis.

TO ENSURE THAT SUPPORTING DATA ARE ADEQUATE

Independent scientists should review and participate in all aspects of planning, broad-based assessments, local analysis, and monitoring. Independent scientists must review the published results of all partnership studies including those prepared by students under the direction of professors in order to be sure that they are appropriately interpreted and documented and that the supporting data is adequate.

Scientists may come from within Federal or State agencies, or the general public, and may hold a variety of important and influential positions. The study team should:

- 1) require minimum standards and criteria for qualifications which must be met before a scientist can be deemed an “expert”;
- 2) provide minimum standards and criteria for determining when a scientist may be deemed “independent”; and
- 3) provide a minimum amount of public notice and opportunity to object whenever any such scientists is considered for such participation, whether such position is permanent or temporary, full time or part time, voluntary or compensated. Such notice should include the qualifications of the individual, the role which the individual will have in such participation, and the type and duration of the position.

Review and participation by independent scientists is a good thing, providing the process require standards which assure that such scientists are in fact qualified and independent, and provide the public the opportunity to review such factors. (Motorized Recreation, Helena, MT - #168.268.13000.160)

Alternatives Analysis

3-147 Public Concern: The Forest Service should evaluate a range of alternatives.

TO COMPLY WITH NEPA REQUIREMENTS

NEPA requires that the Agency consider a range of management alternatives, which is “the heart of the environmental impact statement.” 40 C.F.R. [Section] 1502.14. NEPA requires [the] Forest Service to “rigorously explore and objectively evaluate” a range of alternatives to proposed Federal actions. See 40 C.F.R. [Sections] 1502.14(a) and 1508.25(c). “An agency must look at every reasonable alternative, with the range dictated by the nature and scope of the proposed action.” *Northwest Env'tl Defense Center v. Bonneville Power Admin.*, 117 F.3d 1520, 1538 (9th Cir. 1997). An agency violates NEPA by failing to “rigorously explore and objectively evaluate all reasonable alternatives” to the proposed action. *City of Tenakee Springs v. Clough*, 915 F.2d 1308, 1310 (9th Cir. 1990) (quoting 40 C.F.R. [Section] 1502.14). This evaluation extends to considering more environmentally protective alternatives and mitigation measures. See, e.g., *Kootenai Tribe of Idaho v. Veneman*, 313 F.3d 1094, 1122–1123 (9th Cir. 2002) (and cases cited therein). For this DEIS, the consideration of more environmentally protective alternatives than the 2001 Rule is consistent with the stated national objectives of the DEIS for “protecting roadless area values and characteristics.” (DEIS pg. 3). NEPA requires that an actual “range” of alternatives is considered, such that the Act will “preclude agencies from defining the objectives of their actions in terms so unreasonably narrow that they can be accomplished by only one alternative (i.e., the applicant’s proposed project).” *Colorado Environmental Coalition v. Dombeck*, 185 F.3d 1162, 1174 (10th Cir. 1999), citing *Simmons v. United States Corps of Engineers*, 120 F.3d 664, 669 (7th Cir. 1997). This requirement prevents the EIS from becoming “a foreordained formality.” *City of New York v. Department of Transp.*, 715 F.2d 732, 743 (2nd Cir. 1983). See also, *Davis v. Mineta*, 302 F.3d 1104 (10th Cir. 2002). (Organization, #1693.12.33100.131)

3-148 Public Concern: The Forest Service should approve the least intrusive of the alternatives.

I read the summary and it looks like you are doing a fine job. My personal bias is to stay with the least intrusive plan possible. I see that some of the older plan was less intrusive in parts but I understand the pressures to allow a bit more access. (Individual, #7.1.20000.1)

3-149 Public Concern: The Forest Service should include an alternative that prohibits new mineral leases within all Roadless Areas.

The DEIS should include an alternative that prohibits new mineral leases and development of new mineral leases within ALL Inventoried Roadless Areas. (Individual, #3.3.33200.1)

BECAUSE CARIBOU NATIONAL FOREST ROADLESS AREAS COULD BE AFFECTED

More Phosphate Mining Impacts - All 3 alternatives allow phosphate mining and associated roads on existing leases, which currently impact about 8,000 acres in several Roadless Areas on the Caribou National Forest. The existing 2001 Rule does not allow new leases in Roadless Areas. But the proposed Idaho Roadless Rule would; the Known Phosphate Lease Area includes between 14,000 and 19,000 acres not now leased within Caribou NF [National Forest] Roadless Areas, which could eventually be impacted. (Individual, #1456.8.20000.423)

3-150 Public Concern: The Forest Service should consider an alternative that would establish procedures and protocols for management activities that would affect threatened, endangered, and sensitive species.

The DEIS should consider alternatives that establish specific procedures and protocols for management activities that would impact Threatened, Endangered, and Sensitive Species. (Individual, #3.4.33200.1)

3-151 Public Concern: The Forest Service should consider an alternative that would protect municipal watersheds from development activities.

The DEIS should consider alternatives that protect municipal watersheds from development activities. (Individual, #3.5.33200.1)

3-152 Public Concern: The Forest Service should consider an alternative that would provide additional protection for water quality-limited stream segments.

The DEIS should consider alternatives that provide additional protection for water quality-limited stream segments. (Individual, #3.6.33200.1)

3-153 Public Concern: The Forest Service should disclose and evaluate the alternatives provided to the Roadless Area Conservation National Advisory Committee for fuels reduction in the Backcountry/Restoration theme.

BECAUSE THOSE ALTERNATIVES COULD MEET THE PURPOSE AND NEED

During the April 2008 RACNAC [Roadless Area Conservation National Advisory Committee] meeting, the Forest Service distributed a memo that delineated "Options for timber cutting and associated road construction in the Backcountry/Restoration." This memo lays out alternatives for fuels reduction in the Backcountry theme that would involve roads and logging. The F[inal] EIS should disclose and evaluate these alternatives and their impacts on the natural and human environment. If any of these alternatives are dismissed, they should still be disclosed. Because these alternatives could meet the purpose and need, and because they may be incorporated into the final Rule and FEIS, we [Idaho Conservation League] specifically request a public comment period to allow input on these alternatives. This could include a comment period upon publication of an FEIS or a Supplemental EIS. (Preservation/Conservation, Boise, ID - #4156.57.21000.260)

3-154 Public Concern: The Forest Service should provide site-specific analysis of how the selected alternative would impact resources that are protected under existing Forest Plans.

On page 1137, the Preamble contains a discussion on the impact of the draft Rule on Forest Plan implementation where it says, “the management direction proposed by these regulations would take precedence over any inconsistent regulatory provision or land and resource management plan.” Given the level of analysis and consultation that has occurred in the development of these plans, the F[inal] EIS must provide site-specific analysis of how the selected alternative would impact resources that are protected under existing plans. (Preservation/Conservation, Boise, ID - #4156.7.22310.100)

Alternative 1 – The 2001 Rule

3-155 Public Concern: The Forest Service should adopt Alternative 1, the 2001 Roadless Rule.

TO KEEP EXISTING PROTECTIONS

Keep the existing 2001 Rule because it generally prohibits road building and logging in all the remaining Roadless Areas, while the other 2 Alternatives would not. (Individual, Idaho Falls, ID - #1456.3.33300.800)

TO REDUCE ENVIRONMENTAL IMACTS

I urge the Forest Service to adopt Alternative 1, which presents a management regime based on the approach set out in the 2001 Roadless Rule. The other two alternatives will cause significant environmental impacts, including significant impacts to important biological resources, cultural resources, scenic integrity, and non-motorized recreation. These impacts will occur regardless of whether the Forest Service complies with NEPA, the Endangered Species Act, the National Historic Preservation Act, and other federal laws when planning specific undertakings that could result from adopting Alternatives 2 and 3. (Individual, #1435.1.33000.130)

Alternative 1 is environmentally better than Alternatives 2 or 3 with respect to mining, road construction, induced soil erosion and nonpoint source water pollution, and ecological factors that will preserve native species diversity. (Individual, #1812.2.33000.2)

TO PROTECT CULTURAL RESOURCES

The construction of new roads, as proposed under Alternatives 2 and 3, will increase the potential for significant cultural resources to be damaged by looters, vandals, and OHV [off-highway vehicle] users (those who stray from the road). There is no way that Alternative 3 can have the same “low” potential to damage cultural resources as Alternative 1, as stated in the table on page 19 in the summary section of the Draft EIS. This analysis is flawed. As we’ve seen elsewhere, building new roads increases public access, which increases the potential for looting, vandalism, and disturbance. (Individual, #1435.2.33000.680)

FOR FUTURE GENERATIONS

I support Alternative 1 for the National Forest System lands in Idaho Roadless Areas, which is full protection under the 2001 Roadless Rule. I want future generations to enjoy the same landscape as we have today, and I want the same ecological values to be retained as our national legacy. (Individual, Lisle, IL - #6542.2.33300.740)

TO PROVIDE FOR BACKCOUNTRY RECREATION

Alternative 1 (No Action) is the most protective of backcountry winter recreation. Backcountry recreationists treasure the kinds of experiences that Roadless Areas provide. Many of Idaho’s Roadless Areas contain spectacular and irreplaceable backcountry ski and snowshoe destinations. Research has shown that specialized recreationists such as our members have a strong sense of place and high place dependence. In other words, we have a strong relationship with places, and management that eliminates

or damages the natural character of those places will impact our enjoyment of places of great importance to Winter Wildlands Alliance's members. (Recreation/Conservation Organization, Boise, ID - #1721.9.33300.510)

BECAUSE IT SUPPORTS THE OUTDOOR RECREATION ECONOMY

Alternative 1 (No Action) supports the outdoor recreation economy of Idaho and surrounding States. The Outdoor Industry Association reports that active (i.e., non-motorized) outdoor recreation in Idaho supports 37,000 jobs, \$154 million in annual tax revenue, and \$2.2 billion in retail sales and services. This represents roughly five percent of the gross State product. The USFS significantly underestimates this positive effect of outdoor recreation in the State. Recreation in Idaho's backcountry, including in Roadless Areas, is a unique "product" that the State has to offer. Our membership prefers and actively seeks the kinds of experiences that only backcountry areas can provide. (Recreation/Conservation Organization, Boise, ID - #1721.15.33300.870)

TO PROTECT ROADLESS AREAS FROM EXTRACTIVE USES

Alternative 1 (No Action) is the most environmentally protective. Replacing the landmark 2001 Roadless Rule with either of the other alternatives will open current roadless lands to resource extraction such as mining, and logging. The DEIS claims that just 609,500 acres will be subject to more resource extraction under the Idaho Rule. However, our review of the draft reveals that nearly 7.6 million acres will be at greater risk of resource extraction under the Idaho Rule. That's 85 percent of all the Roadless Area acreage available. The Preferred Alternative would lead to a significant erosion of a small and finite resource that our membership [Winter Wildlands Alliance] cherished. Alternative 1 does not pose that same risk. (Recreation/Conservation Organization, Boise, ID - #1721.12.33300.800)

BECAUSE IT IS THE MOST FISCALLY RESPONSIBLE

Alternative 1 (No Action) is the most fiscally responsible. (Recreation/Conservation Organization, Boise, ID - #1721.17.33300.800)

TO SUPPORT SUSTAINABLE ECOTOURISM AND NON-MOTORIZED RECREATION-BASED JOBS

The economic benefits of increased mining, logging, and motorized recreation under Alternative 3 are unsustainable and will be short-lived. We've seen this elsewhere time and time again. The need for roadless protection outweighs the short-lived economic benefits. Alternative 1 paves the way for ecotourism and other non-motorized recreation, which will create more sustainable jobs. (Individual, #1435.4.33000.800)

TO PROTECT ECOSYSTEMS AND WILDLIFE HABITAT FROM INDUSTRIAL DEVELOPMENT

I support Alternative 1 and urge you to maintain all protections provided by the Roadless Area Conservation Rule for all Roadless Areas in Idaho. The intent of the Roadless Area Conservation Rule—to protect ecosystems and wildlife habitat from industrial development—would be completely undermined by the proposed "five management area themes." Your description of areas that would be opened to development as being under "active management designed to accomplish sustainable protection" is disingenuous. (Individual, #153.1.33300.600)

Alternative 2 – Existing Plans

3-156 Public Concern: The Forest Service should modify Alternative 2.

TO ALLOW ROAD BUILDING WITHIN ONE-HALF MILE AROUND EXISTING LEASES

BLM supports the Existing Plan Alternative (#2), with a slight modification. This alternative allows road building within a one-half mile buffer around Known Phosphate Leasing Areas (KPLAs). BLM supports this alternative, as it would allow for future leasing within those areas (after NEPA analysis is conducted and the Forest Service is consulted). The only problem we see with this alternative is that not all of BLM's leases lie within KPLAs. BLM has 15 leases, termed "preference right leases," that were issued outside the boundaries of a KPLA and that contain some National Forest System lands (out of 52 total leases containing National Forest System lands). BLM would favor language that allows road building

within one-half mile around KPLAs, as the Existing Plan Alternative allows, but we'd like to request consideration for a one-half mile buffer around existing leases be added to Alternative 2. (Federal Agency/Elected Official, Boise, ID - #6544.4.33400.423)

Alternative 3 – The Proposed Idaho Roadless Rule

3-157 Public Concern: The Forest Service should select Alternative 3, the proposed Idaho Roadless Rule.

I have looked over the EIS for the Roadless Area Conservation. I appreciate that so much time and effort have been placed into preserving the natural areas, but wisely thinking of the other aspects such as minerals, fire management, etc. I just wanted to give everyone a thumbs up that I think the Proposed Rule, Alt[ernative] 3, looks like a very wise choice. (Individual, #85.1.33500.2)

ICIE [Idaho Council on Industry and the Environment] supports the preferred alternative as it relates to phosphate mining. (Organization, #1687.4.31000.423)

BECAUSE A MULTIPLE-USE APPROACH IS BETTER THAN A FEDERALLY IMPOSED APPROACH

I favor the Idaho Roadless Rule (Alternative 3) over the other alternatives. A common-sense, multiple-use approach to forest management is better than a "Washington knows all" approach. (Individual, #347.1.33500.123)

BECAUSE IT WOULD PROVIDE FOR MANAGEMENT FLEXIBILITY

BLM supports the Idaho Roadless Rule as discussed in the DEIS under Alternative 3, because it provides the BLM and Forest Service with the most flexibility for the possible consideration of future phosphate leasing actions, and for consideration of those off-lease activities that may be necessary to ensure the recovery of the phosphate resource on-lease in the General Forest and Backcountry/Restoration theme areas. (Federal Agency/Elected Official, Boise, ID - #6544.3.33500.423)

TO ENSURE PROTECTION FROM WILDFIRES

I live in Eastern Idaho [and] can see all the dead [and] dying trees. I believe the only way is Alternative 3. Believe me I'm not a tree hugger [but] we are going to have fires in our forests that will be so costly. (Individual, Idaho Falls, ID - #340.1.33500.260)

3-158 Public Concern: The Forest Service should not select Alternative 3.

We [Winter Wildlands Alliance] do not support the Idaho State Petition Process or the resulting Alternative. (Recreation/Conservation Organization, Boise, ID - #1721.2.33500.001)

BECAUSE IT WOULD INCREASE THE MAINTENANCE BACKLOG

The Forest Service faces maintenance obligations on a road network totaling over 380,000 miles. The Agency currently has a maintenance backlog estimated at \$4.5 billion. This maintenance backlog has caused impacts to aquatic and terrestrial natural resources as well as recreational opportunities on Federal lands. In this context, it would be both environmentally and fiscally irresponsible to build new roads in areas that do not currently have them. Until the Forest Service can responsibly manage the existing road network, it should not increase in size. Alternative 3 would increase the road network more than Alternative 1, and is thus inferior. (Recreation/Conservation Organization, Boise, ID - #1721.18.33500.860)

BECAUSE IT DOES NOT ADEQUATELY CONTROL EROSION

I prefer Alternative 1 over Alternative 3. Alternative 3: "Idaho Roadless Rule (Proposed Action)" has some environmental problems with respect to controlling erosion. (Individual, WA - #1812.11.33300.230)

BECAUSE IT WOULD CAUSE NON-POINT SOURCE POLLUTION

I prefer Alternative 1 over Alternative 3. Alternative 3: “Idaho Roadless Rule (Proposed Action)” has some environmental problems with respect to nonpoint source water pollution as a result of road construction and timber cutting. (Individual, WA - #1812.12.33300.243)

3-159 Public Concern: The Forest Service should modify Alternative C to move the acres assigned to General Forest to Backcountry/Restoration.

TO PROVIDE PROTECTION AND ALLOW FOR MANAGEMENT ACTIVITIES

It appears that if Alt[ernative] C [of the] Idaho Roadless Rule were modified to move the 609,500 acres of GFRG [General Forest, Rangeland, and Grassland] to Backcountry/Restoration or Primitive, this would provide the best protection. This would still allow some forest and recreational management activities on these lands. It would also allow other uses such as livestock grazing, wildlife habitat enhancement, thinning, and prescribed burning to occur. I support Alt. C, with the modifications described above. (Individual, Idaho Falls, ID - #640.2.33500.200)

3-160 Public Concern: The Forest Service should ensure that the preferred alternative provides adequate access to historic mines, cabins, and dispersed campsites and trailheads.

The preferred alternative must provide for an adequate number of routes as required to provide access to the many historic mines and cabins, and an adequate number of dispersed campsites and trailheads. (Motorized Recreation, Helena, MT - #168.17.33500.500)

Revisions to the Draft Environmental Impact Statement

3-161 Public Concern: The Forest Service should revise the EIS.

**TO ANALYZE THE IMPACT ON THE SETTLEMENT AGREEMENT INVOLVING
THE CLEARWATER NATIONAL FOREST**

The settlement agreement on the Clearwater National Forest (CNF) Plan is legally binding. It states in Section II.a: “The Forest Service agrees, effective immediately, not to approve any timber sale or road construction project decisions within the area covered by the proposed ‘Idaho Wilderness, Sustainable Forest and Communities Act of 1993,’ H.R. 1570 and that such lands will be managed according to Forest Plan standards and guidelines for recommended wilderness (Management Area B2). The Forest Service further agrees to apply these management prescriptions to any area(s) added by amendment to H.R. 1570, and to any area(s) included in any other Idaho wilderness proposal introduced in Congress by any member of the Idaho delegation.” The agreement applies to several areas on the CNF. Why was this crucial, legally binding [settlement agreement] omitted from the DEIS? Why are you backing out of your legal obligations? (Organization, #1800.4.31000.180)

TO ANALYZE THE IMPACT OF HR 1975

There [is not] a recognition of HR 1975 in the DEIS. (Organization, #1800.17.31000.180)

TO ALLOW THE TRIBES TO ADEQUATELY ASSESS IMPACTS

The risks to the Tribes [Shoshone-Bannock] rights and interests cannot be adequately assessed given the insufficient baseline data reflected in the DEIS. The management of Idaho’s IRAs [Inventoried Roadless Areas] under the proposed Rule may have direct, indirect, and cumulative impacts to the rights and interests, guaranteed by Treaty [Fort Bridger Treaty of 1868] and Federal Laws/Policies, as well as established policies of the Tribes. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.39.31000.150)

**TO ANALYZE THE IMPACTS OF CITIZEN OUTRAGE IF THE PROPOSED
IDAHO ROADLESS RULE IS ADOPTED**

The current Rule, because of its wording, has generally prohibited logging in Roadless Areas. Perhaps the most infamous roadless timber sales in Idaho, the Cove/Mallard sales, were finally dropped after massive citizen's protest and other factors. The Forest Service claimed one of the reasons those sales were dropped was because of the interim moratorium that led to the Roadless Rule. The DEIS does not analyze the impacts of citizen outrage that may result if this rule were to be adopted. (Organization, #1800.45.31000.60)

3-162 Public Concern: The Forest Service should not use community protection as an excuse for road construction and timber harvest.

BECAUSE THE AGENCY HAS SUCCESSFULLY SUPPRESSED FIRES IN ROADLESS AREAS

Community protection is important but it has very little to do with logging in Roadless Areas, and the rationale is ambiguous at best for opening up logging and road building in nearly 6 million acres of Idaho roadless lands to protect communities. The Final 2001 Roadless Rule defined the true situation in the following statement: The (Forest Service) Agency has a long history of successfully suppressing fires in Inventoried Roadless Areas and this high level of suppression performance is expected to continue. Furthermore, the agency rarely builds new roads to suppress fires. Building roads into Inventoried Roadless Areas would likely increase the chance of human-caused fires due to the increased presence of people. Fire occurrence data indicate that prohibiting road construction and reconstruction in Inventoried Roadless Areas would not cause an increase in the number of acres burned by wildland fires or in the number of large fires (FEIS Vol. 1, 3-115). (36 CFR [Section] 294). In 2001, the Forest Service stated they did not need more roads to prevent and stop wildfires from harming communities. If climate change or other conditions have changed the Forest Service policies, it is not established or documented in the Idaho DEIS. . . . (Organization, #1693.19.31000.260)

3-163 Public Concern: The Forest Service should include data from the 2000 Roadless Rule Final EIS.

TO ELIMINATE THE APPEARANCE OF BIASES AGAINST THE 2001 ROADLESS CONSERVATION RULE

The DEIS is biased against the 2001 Roadless Rule and excludes critical data from the 2000 Roadless Rule Final EIS in order to bolster its claims on the efficacy of road-building and commercial logging to reduce fuel hazards and wildfire risks in Roadless Areas. The Idaho Roadless Rule DEIS is clearly biased against the 2001 Roadless Rule, and this bias distorts the analysis and disclosure by excluding critical data from the document. Consequently, the DEIS is fundamentally flawed and needs to be significantly revised for the FEIS. For the convenience of Forest Service staff, we have provided you with numerous excerpts above from the 2000 FEIS that should be disclosed in the Idaho Roadless Rule FEIS. (Organization, #1810.20.31000.260)

Fire and Forest Health

3-164 Public Concern: The Forest Service should redefine and reevaluate the fire condition class.

TO CLARIFY THAT A REALISTIC PROBLEM ACTUALLY EXISTS

Fire condition class is not a permanent condition. The Idaho DEIS describes fire condition class as "departed from the natural fire regime and natural range of variability," page 103. The Idaho DEIS and Fuel Report does not analyze current fire conditions to determine if and what forests are currently departed from the natural range of variability, but it bases all assumptions, tables, and management criteria on outdated 2000 data. On page 111, the claim is made "about 16,000 acres of timber harvest are projected to occur over a 15-year period in Idaho Roadless Areas." If there is any precision to this estimate, it should be mapped in the potential areas where it can occur. If there are only about 16,000 acres to be harvested in 15 years, why are there 7.5 million acres of Idaho lands included in Primitive,

Backcountry and General Forest themes where “timber cutting to reduce uncharacteristic and unwanted wildfire risk” is permitted? By treating 16,000 acres every 15 years it will take about 7,035 years to reduce uncharacteristic and unwanted wildfire in Idaho Roadless Areas. Either the speed of treatment or the area that needs treatment, or both, is not connected with a realistic problem. (Organization, #1693.25.31000.262)

3-165 Public Concern: The Forest Service should clearly define the basis for effectiveness of actions proposed for reducing wildfires.

BECAUSE THE UNCERTAINTY OF EFFECTIVENESS IS ACKNOWLEDGED IN THE ASSUMPTIONS OF THE FUEL REPORT

The basis for effectiveness of any action to reduce uncharacteristic and unwanted wildfire is not established in the Idaho DEIS. The uncertainty of effectiveness is acknowledged in the Assumptions Related to Tool section of the Fuel Report, which states, “However, whether mechanical treatments reduce the intensity and severity of wildland fire is disputed and uncertain.” As is stated in the Fuel Report, even if mechanical treatment is permissible in 7.5 million acres of Idaho roadless lands, mechanical treatments are used more often in WUI [Wildland-Urban Interface] than outside of WUI. “IRAs [[Inventoried Roadless Areas]] would be a low priority for fuel treatment because higher priority areas are more common outside roadless areas,” according to the Fuels Report, which is born out in both Idaho DEIS analysis finding only 4.5 percent of Idaho WUI in roadless lands and by the CFPZ [Community Fire Planning Zone] analysis of TWS [the Wilderness Society] showing only 1.2 percent of Idaho WUI in roadless lands. (Organization, #1693.26.31000.262)

Wildland-Urban Interface

3-166 Public Concern: The Forest Service should reevaluate the extent of Wildland-Urban Interface in Idaho Roadless Areas.

BECAUSE DATA INDICATE THAT VERY LITTLE WILDLAND-URBAN INTERFACE ACTUALLY EXISTS

The problems with the WUI [Wildland-Urban Interface] defined by the Idaho DEIS stem from it not accurately assessing what a community is and where the most effective use of limited resources should go to protect those communities through fuels reduction. The Wilderness Society has done extensive analysis on how and where to focus planning efforts around communities that best achieves the goal of protecting communities from fire based on scientifically defensible methodology and data. The Wilderness Society developed the Community Fire Planning Zone (CFPZ), which is a ½-mile buffer around communities (defined as two structures in a 40-acre area). Using the CFPZ as a realistic measurement of WUI demonstrates there is very little roadless land close enough to communities to warrant broad loopholes for logging and road building in millions of acres of Idaho’s roadless land. For a detailed report on the CFPZ, how it was developed, and why we chose [a] ½ mile-buffer, please read the full report: Targeting the Community Fire Planning Zone, which is enclosed in our comments. Looking at a map of roadless themes in the Idaho DEIS compared with the CFPZ, we see there are only 110,578 acres of roadless land within the CFPZ (see appendices). This means 1.2 percent of all roadless lands in Idaho are located within the CFPZ. Here are the critical WUI lands where attention needs to be focused for community protection through fuel treatments and defensible space. It is significant to note much of this focused CFPZ work in Idaho Roadless Areas is already being done under the confines of the 2001 Rule and is expected to continue. If the Idaho Rule focused on the 110,578 acres of critical need in the realistic WUI, rather than a 1-million-acre WUI as is in the Idaho DEIS, it might fit the community protection aspect of the Idaho DEIS purpose and need. Where the need is so inflated to a 1-million-acre WUI, the purpose of any supposed fuel treatment on 7.5 million acres of Backcountry, Primitive, and General Forest themes becomes impossible to achieve and pointless to attempt. Mapping of specific areas where additional flexibility is needed to address the “risk of severe wildfire” to protect communities, homes, and property and how that connects to management themes is needed in the Idaho F[inal] EIS. (Organization, #1693.20–21.31000.263)

3-167 Public Concern: The Forest Service should map the intersection between fire regimes, fire condition class, Wildland-Urban Interface, and Roadless Areas.**TO ANALYZE WHERE AND HOW WILDFIRES CAN BE PREVENTED**

While the WUI [Wildland-Urban Interface] zones in the Idaho DEIS are flawed in interpretation and mapping, as already stated in these comments, the intersection between fire regimes, fire condition class, WUI, and Roadless Areas is never mapped. Various tables in the Idaho DEIS and the Fuel Report list percentages and acreages in the three fire condition classes, but nowhere is fire condition class mapped for Idaho Roadless Areas. Only in Table 3-12 of the Idaho DEIS is the relationship between fire condition class and Idaho management themes addressed in any form, as a percentage of roadless acres. If the management themes are designed to increase flexibility to do “timber cutting to reduce uncharacteristic and unwanted wildfire risk” as is described in Table 3-12 for the Backcountry theme, where are the fire condition class areas mapped to define location? Up-to-date fire history, where hundreds of thousands of acres in fires have occurred in Roadless Areas since 2000, must be mapped and fire condition class re-examined with current data. It is impossible to analyze where and how Idaho roadless management themes can be used to prevent “uncharacteristic” and “unwanted” wildfire if it is not mapped. (Organization, #1693.24.31000.262)

3-168 Public Concern: The Forest Service should revisit the definition and delineation of Wildland-Urban Interface.**BECAUSE WILDLAND-URBAN INTERFACE IS TOO BROADLY DEFINED**

In the Purpose and Need section of the DEIS, several reasons are given for having an Idaho-specific rulemaking, including the need for “protecting communities, homes, and property from the risk of severe wildfire or other risks existing on adjacent Federal lands,” and “protecting forests from the negative effects of severe wildfire and insect and disease outbreaks” [Footnote 91: DEIS at 3]. It is also noted in the Idaho DEIS that communities are at an increasingly greater risk from wildfire, and there is a need for communities to conduct fuels reduction around communities in what is referred to as the Wildland-Urban Interface (WUI). Critical issues are raised on how the Forest Service defines WUI and a community, and how the Forest Service establishes the need for additional flexibility to log in Roadless Areas to protect communities. These issues bring into question the need for broad exemptions contained in the proposed Idaho Rule to build roads and to log to protect communities in Roadless Areas. The WUI zone used by the Forest Service is a one-mile buffer around communities, which when totaled, equates to roughly 1 million acres of WUI in Roadless Areas in Idaho. The 1 million acres of WUI in Roadless Areas depends on how the Forest Service defines a community, and the WUI zone used by the Forest Service defines a community as one structure per 100 acres (using census blocks). Accordingly, if there are one or more houses within a 100-acre census block, the entire census block is buffered by a 1-mile WUI zone. Defining a community in this way creates a large amount of WUI around houses that are scattered and may not be part of communities, and are built well outside of communities. (Organization, #1649.86.31000.263)

BECAUSE RELIABLE DATA AND REALISTIC MAPS MUST BE USED

The definition and delineation of the Wildland-Urban Interface must be done with reliable, accepted data and calculated in realistic maps. Not only are the WUI data and mapping inaccurate in the Idaho Roadless DEIS, but even with acceptance of the proposed over-broad definition, there is nowhere near 5 million acres of WUI in the State of Idaho. The Forest Service definition of WUI sets many areas as WUI where there is no permanent habitation or even likely season dwellings. The WUI map from the Idaho Rule website shows numerous examples of poorly mapped and defined WUI: Selkirk and Kootenai Peak Roadless Areas on the Idaho Panhandle National Forest, extensive WUI at high elevation with no known habitation. Big Canyon and Klopton Creek Roadless Areas on Nez Perce National Forest, where all of the area surrounding Pittsburg Landing in Hells Canyon is WUI with no known habitation. Secesh Roadless Area on the Payette National Forest has multiple blocks of WUI where habitation is limited. Bear Creek Roadless [Area] on the Caribou National Forest shows extensive WUI where habitation is limited or non-existent. These are only a few examples of inaccurate mapping of

non-existent WUI, and as a result the justification for road building in WUI areas is based upon skewed and incomplete mapping. Clear and accurate mapping is needed in the FEIS so that the public can have a clear understanding of the actual acreage of WUI, and also so that the true rationale for additional exemptions for road building can be examined in a transparent and honest manner [Footnote 92: Wilderness Society Memo to RACNAC (Roadless Area Conservation National Advisory Committee)]. (Organization, #1649.87.31000.263)

TO BETTER PRIORITIZE COMMUNITY PROTECTION NEEDS

When the Forest Service defines the WUI [Wildland-Urban Interface] area as 1 mile surrounding communities, the total amount of WUI roadless lands in Idaho makes up a small percentage of the total Idaho WUI acreage. The chart below demonstrates that only 4.5 percent of the total WUI in Idaho is on roadless lands, using the Forest Service definition. If community protection is the critical reason for taking action and providing more management flexibility in Idaho, the almost 23 million acres of WUI outside of roadless lands should be a higher priority for treatment because of their closer proximity to communities. Total Idaho WUI (using a 1-mile buffer) 23,985,656 acres, Total WUI in Roadless [Areas] (1 mile) 1,080,563 acres, Percentage of ID [Idaho] WUI that is Roadless 4.51 percent. The approximately 24 million acres of WUI as defined by the Forest Service methods comprise almost half of the entire state of Idaho landscape, which totals about 55 million acres. It appears there is an exaggeration of WUI acreage in the Idaho Rule, which needs to be clarified if there is to be proper analysis of the importance the WUI plays in the Idaho Rule. (Organization, #1649.88.31000.263)

Using the Forest Service-defined WUI [Wildland-Urban Interface], the breakdown of how many acres of WUI are in each of the Idaho management themes is as follows: ID [Idaho] Roadless Theme: Backcountry/Restoration - Total Acreage: 5,246,100 - Acres of WUI: 639,712 - Percentage of Theme that is WUI:12%; ID Roadless Theme: General Forest: 609,500- Acres of WUI: 134,059- Percentage of Theme that is WUI: 12%; ID Roadless Theme: Primitive - Total Acreage: 1,656,300 - Acres of WUI: 208,420 - Percentage of Theme that is WUI: 13%; ID Roadless Theme: Special Area - Total Acreage: 68,600 - Acres of WUI:45,841- Percentage of Theme that is WUI:67%; ID Roadless Theme: Wild Land Recreation - Total Acreage: 1,378,600 -Acres of WUI: 52,531 - Percentage of Theme that is WUI:4%; Total: Total Acreage: 8,959,100 - Total: Acres of WUI: 1,080,563 - Total: Percentage of Theme that is WUI:12%. This chart shows that only 12 percent of the Backcountry/Restoration category and 22 percent of the General Forest category are within the Forest Service-defined WUI. If WUI represents the area that communities should focus on to conduct mechanical thinning and other fuels reduction methods, then why are broad exemptions given for road building and logging in roughly 5.8 million acres of roadless land in Idaho when the area identified for community protection from fire is much smaller? Certainly it cannot be for community protection from fire. There are large areas of Backcountry/Restoration without any identified WUI, such as almost all of the Clearwater NF [National Forest], and yet permissible activities in these areas include the cutting of timber or building of roads to reduce the threat of wildland fire, even though that threat is unclear and remains undefined. (Organization, #1649.89.31000.263)

BECAUSE THE TOTAL ACRES OF WILDLAND-URBAN INTERFACE MAY BE EXAGGERATED

When the Idaho DEIS defines the WUI [Wildland-Urban Interface] area as 1 mile surrounding communities, the total amount of WUI roadless lands in Idaho makes up a small percentage of the total Idaho WUI acreage. The chart below demonstrates that only 4.5 percent of the total WUI in Idaho is on roadless lands, using the Idaho DEIS definition. If community protection is the critical reason for taking action and providing more management flexibility in Idaho, the almost 23 million acres of WUI outside of roadless lands should be a higher priority for treatment because of their closer proximity to communities. Total Idaho WUI (using a [1-] mile buffer) 23,985,656 acres - Total WUI in Roadless [Areas] 1,080,563 - Percentage of ID [Idaho] WUI that is roadless 4.51%. It's also interesting to note [that] the 24 million acres of WUI defined by the Idaho DEIS methods is almost half of the entire state of Idaho landscape, of about 55 million acres. Anyone who has walked, driven, or flown around Idaho is not likely to consider half the vast landscape as Wildland-Urban Interface. It appears there is an exaggeration in WUI definition in the Idaho Rule, which is not useful in determining what areas may be at risk. (Organization, #1693.17.31000.263)

TO CLARIFY THE NEED FOR BROAD EXEMPTIONS FOR ROAD CONSTRUCTION AND TIMBER HARVEST

Using the Idaho DEIS-defined WUI [Wildland-Urban Interface], the breakdown of how many acres of WUI are in each of the Idaho DEIS management themes is as follows:

ID Roadless Theme	Total Acreage	Acres of WUI	Percentage of Theme That is WUI
Backcountry/Restoration	5,246,100	639,712	12%
General Forest	609,500	134,059	22%
Primitive	1,656,300	208,420	13%
Special Area	68,600	45,841	67%
Wild Land Recreation	1,378,600	52,531	4%
Total	8,959,100	1,080,563	12%

This chart shows that only 12 percent of the Backcountry/Restoration category and 22 percent of the General Forest Category are within the Forest Service-defined WUI. If WUI represents the area that communities should focus on to conduct mechanical thinning and other fuels reduction methods, then why are broad exemptions given for road building and logging in roughly 5.8 million acres of roadless land in Idaho, when the area identified for community protection from fire is much smaller? Certainly it cannot be for community protection from severe wildfire effects, when these are naturally functioning forests.

If there are 1,080,563 acres of WUI in Idaho Roadless Areas, using the Idaho DEIS figures, why are 7,511,900 acres opened to more fuels treatment and logging for WUI protection? There is no connection between the mapping of WUI and the management directives of the management themes.

There are also large areas classified in the Backcountry/Restoration theme without any identified WUI. Almost all of the Clearwater National Forest Roadless Areas are classified as Backcountry, where there is no identified WUI. The Nez Perce National Forest also includes vast areas of Backcountry themes without any connection to WUI. Permissible activities in these areas include the cutting of timber and road building to reduce “the significant threat of wildland fire,” according to the Idaho DEIS, even though the threat is unclear, undefined, and not located on any map. (Organization, #1693.18.31000.263)

3-169 Public Concern: The Forest Service should clearly define Wildland-Urban Interface.

An issue of concern is the lack of a clear definition of WUI [Wildland-Urban Interface]. Maps in the DEIS were developed by the State of Idaho in association with the Idaho Petition and include uninhabited and sparsely populated areas (i.e., 1 structure/100 acres). The methodology for the development of the State-defined WUI does not correspond with the default ½-mile WUI definition from HFRA [Healthy Forest Restoration Act]. Even using the State’s methodology, the WUI map indicates that 95 percent of WUI is located outside of Roadless Areas. This is a critical point to recognize in light of upcoming discussions and should influence the discussion over the extent of any exemptions for road construction and timber cutting in WUI areas. (Preservation/Conservation, Boise, ID - #4156.150.31000.263)

Maps**3-170 Public Concern: The Forest Service should include more detailed and informative maps.****TO ALLOW FOR EFFECTIVE IMPACTS ANALYSIS**

The maps provided do not clarify the management themes because they are not produced to scale and are only available at the Forest level. Only by producing scaled maps of each IRA [Inventoried Roadless Area] with vegetative types, watercourses, and critical habitat areas; layered with management themes, are the Tribes [Shoshone-Bannock] able to ascertain the direct, indirect, and cumulative impacts from

the designation of management themes. The insufficiency of the maps cannot be understated because it is truly the only way to effectively analyze the impacts to significant IRAs and critical habitat. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.78.23100.620)

TO CORRECT ERRORS IN WILDLAND-URBAN INTERFACE LOCATIONS AND BOUNDARIES

The Idaho DEIS sets many areas as WUI [Wildland-Urban Interface] where there is no permanent habitation or even likely seasonal dwellings. A cursory view of the WUI map from the Idaho Rule website shows these examples of poorly mapped and defined WUI, from north to south and to east. - Selkirk and Kootenai Peak Roadless Areas on the Idaho Panhandle NF, extensive WUI at high elevation with no known habitation. - Big Canyon and Klopton Creek Roadless Areas on Nez Perce NF, where all of the area surrounding Pittsburg Landing in Hells Canyon is WUI with no known habitation. - Secesh Roadless Area on the Payette NF has multiple blocks of WUI where habitation is limited or non-existent. - Bear Creek roadless on the Caribou NF shows extensive WUI where habitation is limited or non-existent. These are only examples of inaccurate mapping of non-existent WUI. Clear and accurate mapping is needed and must be available in the Idaho FEIS. (Organization, #1693.16.31000.263)

TO ASSIST THE PUBLIC IN EVALUATING THE PROPOSED ACTION

The maps and figures are not easily understood. There are no identifiable or named features and no road and trail numbers on the maps. It is very difficult for the public to orient themselves and to interpret the proposed action for each specific road and trail. Therefore, the public cannot adequately evaluate the proposal and cannot develop comments with reference to specific roads and trails. (Motorized Recreation, Helena, MT - #168.182.10430.620)

TO ENSURE THAT NUMBERS ARE ACCURATE AND EFFECTS CAN BE COMPARED

The Idaho DEIS claims 12,000 acres developed through logging and 60 miles of road construction will be done in 15 years, page 255; and the Idaho DEIS also claims 16,000 acres of timber harvest will be done in 15 years, page 111. Which figure is correct, 12,000 or 16,000 acres of logging? It appears a 33-percent increase or a 25-percent decrease in logging is anticipated but it is impossible to know if any of these figures are correct when no location is ever established to determine where these logging developments will occur. How can a number be put on the estimated logging and road building without locations mapped? A map of these locations must be included in the Idaho FEIS. Once the correct number of acres to be logged under the proposed Idaho Rule is established and located, a comparison of its effects on wilderness values must be done for the Idaho FEIS. Fragmentation of [Roadless Areas] into smaller parcels of potential wilderness reduces the ecological viability and the potential to be designated. All of these effects must be compared. (Organization, #1693.52.31000.261)

3-171 Public Concern: The Forest Service should correctly identify and map “unauthorized” roads.

BECAUSE MANY OF THESE ROADS WERE AUTHORIZED UNDER REVISED STATUTE 2477

The term “unauthorized roads” is misleading. It leads the public to believe that the road was not authorized at the time it was established. Many of the roads that fall into this class were a part of the Idaho Territorial Road system and were in place prior to the Forest Service reservation and are in fact authorized under RS 2477 [Revised Statute 2477] as public rights of way. These roads were recognized by Congress and belong to the citizens of this country. These roads should be identified and mapped so that the public is made aware of the roads that are currently in existence that are not under the Forest Service’s jurisdiction. (Individual, #1825.14.21000.130)

3-172 Public Concern: The Forest Service should include site-specific maps.

TO MEET THE REQUIREMENTS OF NEPA

The NEPA failings of the DEIS are numerous. Suffice it to say, Appendix C does not contain site-specific maps and that is a major lack of information. How can the DEIS pretend to meet NEPA, including case law surrounding Roadless Areas like California v. Block, without this information? (Organization, #1800.25.32000.620)

3-173 Public Concern: The Forest Service should include maps detailing the location of Bonneville and Yellowstone cutthroat trout habitats.

Major deficiency in the DEIS for the proposed Idaho Roadless Rule is the omission of maps detailing the location of habitats for Forest Service sensitive Bonneville and Yellowstone cutthroat trout. These two species are limited in their geographical range primarily to East and Southeast Idaho. While overlaying the distribution of these species with Idaho Roadless Areas yields a significant amount of habitat both inside and outside of IRAs [Inventoried Roadless Areas], spawning and rearing habitat for these two species occur primarily in the headwater streams found in Roadless Areas on the Caribou-Targhee National Forest. (Preservation/Conservation, Boise, ID - #4156.81.31000.620)

3-174 Public Concern: The Forest Service should provide maps detailing current conditions and proposed changes.

BECAUSE THE MAPS LACK LEGAL DESCRIPTIONS OF ROADLESS AREAS

The maps are not accurate or sufficient. There are no legal descriptions of Roadless Areas. (Organization, #1800.20.31000.620)

BECAUSE THE DESCRIPTIONS OF THE INVENTORIED ROADLESS AREAS ARE NOT ADEQUATE

Adequate maps must be provided. The descriptions of the IRAs [Inventoried Roadless Areas] are not adequate. There need to be clear physical boundaries so that the areas can be identified on the ground. All of the roads that exist must be disclosed on the maps. Areas that were recommended for Wilderness consideration should be correctly described and open to a public comment period once the true miles of roads, amounts burned, and noxious weeds are surveyed. (Individual, #1825.32.31000.600)

TO IMPROVE THE EFFECTIVENESS OF THE DEIS

I received the disc with the draft of the EIS and tried to slog my way through it. I was perturbed at having to really search for anything memorably different from the original and at what I imagine were hundreds of man hours involved in preparation of this draft and its disc and the money spent on doing so. I believe it would have been much more effective to have simply stated the changes with a simple map of these changes that are proposed through this draft. (Individual, #82.1.30000.23)

3-175 Public Concern: The Forest Service should provide more accurate and detailed maps.

TO FACILITATE ACCURATE COMMENT

The maps are worthless. Owning property and being a part of the Johnson Cr. community for over 60 years helps us know this area better. There are roads in the area, yet none are shown. It would be very difficult to make an accurate comment on the other Roadless Areas based on these inadequate maps. There is no mention of the Ditch Cr. road in the Caton Lake #912 overview, only 50 miles of trails. A \$5,000.00 outhouse was built a couple of years ago at the end of this road and trailhead to Rainbow and Caton Lake. Will this expensive property be maintained or allowed to also go to waste? (Individual, #635.5.31000.600)

Technical and Editorial Changes

3-176 Public Concern: The Forest Service should provide site-specific information in Appendix C.

TO ALLOW FOR THOROUGH FOREST PLAN REVIEW AND PUBLIC COMMENT

Appendix C - Site-Specific Areas Wild Clearwater Region. The site-specific discussions of the Roadless Areas in Appendix C lack critical information. Was the latest information truly used in the DEIS in developing Appendix C, as claimed on page 1? Changes were apparently made in Roadless Area

boundaries that have not gone through Forest Plan review and public comment. (Organization, #1800.50.31000.133)

TO ALLOW FOR MEANINGFUL PUBLIC COMMENT

Appendix C - Site-Specific Areas Wild Clearwater Region. The site-specific discussions of the Roadless Areas in Appendix C lack critical information. Was the latest information truly used in the DEIS in developing Appendix C, as claimed on page 1? The lack of site-specific maps in Appendix C, as was done for Forest Plans, makes it impossible for citizens to comment on this process. (Organization, #1800.51.31000.620)

BECAUSE THE FOREST SERVICE HAS ILLEGALLY DIVIDED ROADLESS AREAS

Appendix C - Site-Specific Areas Wild Clearwater Region. The site-specific discussions of the Roadless Areas in Appendix C lack critical information. Was the latest information truly used in the DEIS in developing Appendix C, as claimed on page 1? The Forest Service, in violation of case law dating back to the [19]70s, illegally divided single Roadless Areas into many parts. Why are not all additions to the Selway-Bitterroot Wilderness considered one area as are the additions to the Bob Marshall/Great Bear/Scapegoat Complex during RARE [Roadless Area Review and Evaluation] II and subsequent Forest Plans on the Flathead and Lolo National Forests? In fact, one area, Meadow Creek, is illegally divided into two pieces. Why was this done, contrary to the direction and case law dating back to the [19]70s? (Organization, #1800.54.31000.620)

BECAUSE INFORMATION ABOUT "UNCLASSIFIED" TRAILS IS LACKING

Our concern was amplified after a brief review of Appendix C of the DEIS. Although the existence of some "classified" trails are disclosed for some Roadless Areas, the Agency has failed to include information regarding many currently legal, but technically "unclassified," trails that exist in many Roadless Areas. Many of these "unclassified" trails are currently under review in the Agency's travel management planning and, therefore, should have been referenced in Appendix C. (Organization, #1801.11.31000.680)

3-177 Public Concern: The Forest Service should present information accurately in Appendix C.

TO ESTABLISH THE TRUE STATUS OF NOXIOUS WEEDS IN ROADLESS AREAS

In reading Appendix C - Idaho Roadless Areas, it is stated repeatedly, "There are no inventoried locations of noxious weeds within the roadless area." This can only be true if there have been no inventories of noxious weeds within those Roadless Areas or if those inventories are being ignored. (Individual, #1825.74.31000.335)

When you review Appendix C of the Idaho Roadless DEIS by forest and Roadless Areas, you find many blanket statements such as "no inventoried noxious weeds." While some forests can list threatened and endangered plants by Roadless Areas, there is no mention of noxious weeds. The Boise National Forest does a better job of noxious weed inventory. Many of the other forests tend to make a similar statement regarding no noxious weeds inventoried in most of their IRAs [Inventoried Roadless Areas]. (Organization, #1687.9.31000.353)

BECAUSE PROJECTIONS FOR GEOTHERMAL POTENTIAL SEEM INFLATED

Appendix C - Site-Specific Areas Wild Clearwater Region. The site-specific discussions of the Roadless Areas in Appendix C lack critical information. Was the latest information truly used in the DEIS in developing Appendix C, as claimed on page 1? The list of areas [in Appendix C] does not raise every problem and question. To do so would require a volume even more extensive than Appendix C. In the case of geothermal potential, where was this information obtained to come up with what would appear to be grossly over-inflated projections of potential? (Organization, #1800.53.31000.424)

**BECAUSE YELLOWSTONE CUTTHROAT TROUT ARE NOT ACKNOWLEDGED
AS BEING REGION 4 SENSITIVE SPECIES**

For the past 17 years, until my February 2008 retirement, I was the Southeast Region Fisheries Manager for Idaho Department of Fish and Game. Much of the land in this region is within the Caribou National Forest. Watersheds in the region are the upper Snake River, which contains native Yellowstone cutthroat trout and the Bear River, which contains native Bonneville cutthroat trout. Both of these cutthroat trout subspecies are considered Region 4 Sensitive Species, as recently confirmed by Jim Capurso, the Caribou-Targhee National Forest Fisheries Biologist in his attached email. In Appendix C of the RAC-NFSLI-DEIS, Bonneville cutthroat trout are acknowledged as a Region 4 Sensitive Species in each of the Roadless Areas. In contrast, Yellowstone cutthroat trout are never acknowledged as being Region 4 Sensitive Species in the RAC-NFSLI-DEIS. This omission occurs in each of the following Idaho Roadless Areas of the Caribou National Forest: Bear Creek #615, Bonneville Peak #161, Gannett Spring Creek #111, Huckleberry Basin #165, North Pebblew #155, Pole Creek #160, Sage Creek #166, Schmid Peak #163, Scout Mountain #152, Stump Creek #162, Toponce #153, [and] West Mink #151. (Individual, #1814.1.31000.356)

3-178 Public Concern: The Forest Service should correct the special mapping area for the French Creek Inventoried Roadless Area in the Payette National Forest.

BECAUSE FRENCH CREEK WAS FOUND TO BE UNSUITABLE FOR WILD AND SCENIC RIVER STATUS

My comment is regarding how you have incorrectly mapped a “special area” on the Payette National Forest, in the French Creek IRA [Inventoried Roadless Area]. You have highlighted French Creek as a special area along the river corridors. Although this river system was identified as being eligible for Wild and Scenic River Status in the Forest Plan, a suitability study was completed as a part of Forest Plan revision, which is an appendix to the plan, and it was NOT found eligible, that determination was made in the ROD [Record of Decision] for the Forest Plan. So, you need to take the special area Wild and Scenic River “eligibility” off French Creek. Its management has reverted to the surrounding management area prescriptions. You also have Hazard Creek marked as eligible for Wild and Scenic River Status. This study has not been completed yet, so your mapping for that area is correct. (Organization, #15.1.30000.130)

3-179 Public Concern: The Forest Service should revise its criteria for determining roadless character.

BECAUSE TOPOGRAPHY WOULD MAKE A LOGICAL CRITERION FOR DETERMINING CHARACTER

A road had an area of influence when it was constructed and when it is present. As your document points out, for timber management purposes, it is about one mile. It appears appropriate then that topography features rather than a road terminus or edge is probably the most logical control item for determining roadless character. Obviously that has not occurred. (Individual, #760.19.47000.201)

3-180 Public Concern: The Forest Service should include a glossary.

The Forest Service loves acronyms. They should be included in the glossary and define GFRG [General Forest, Rangeland, and Grassland], SAHTS [Special Areas of Historical or Tribal Significance]. These acronyms and their meanings should be included in the Glossary. (Individual, #1825.6.31000.23)

3-181 Public Concern: The Forest Service should better define key terms.

BECAUSE “HIGH LEVELS OF HUMAN USE” NEEDS TO BE DEFINED

In the DEIS Purpose and Need section on page 3 and in Chapter 1, there is the claim that the proposed management direction is based on individual roadless characteristics, including those “(4) displaying high levels of human use. . . .” The Glossary does not contain a definition of “high levels of human use.” What are high levels of human use? Is it from hikers, hunters, or other human users through recreation? Is it road construction or mining or logging? And where are there “high levels of human use” in Idaho

Roadless Areas? Where is a map that shows where there are “high levels of human use?” If the need for a continuum of management is based on some areas having high levels of human use, it must be defined and located, rather than assumed. (Organization, #1693.8.31000.600)

BECAUSE “SUSTAINABLE” NEEDS TO BE DEFINED

In the Idaho DEIS Purpose and Need section of Chapter 1, the claim is made that the proposed management themes provides a continuum for management (pg. 24), with one end of the spectrum being “active management designed to sustainable forest, rangeland and grassland management.” Another verb is needed to complete this clause, as it is described in proposed Idaho Rule (pg. 1137) as “active management designed to accomplish sustainable forest. . . .” Is this the same thing? The larger concern relates to what sustainable forestry is. Where is a definition of “sustainable” in this context? While active management is defined in the Glossary, there is no definition of “sustainable forest, rangeland and grassland management.” Is it sustained multiple use? Is it sustained forest, rangeland or grassland products? If the bulwark of the management continuum is sustained management - what is it? Where is it? What are the economic and environmental effects of sustained forest, rangeland and grassland management? What are the effects to roadless values for sustained forest, rangeland and grassland management? How can it be assumed “sustained management” is positive for roadless values and characteristics, without it being defined and without it being compared to the 2001 Rule? (Organization, #1693.7.31000.600)

BECAUSE “SEVERE” NEEDS TO BE DEFINED

In the Idaho DEIS Purpose and Need section on page 3 and in Chapter 1, the management direction for protecting communities from “the risk of severe wildfire” and protecting forests from “the negative effects of severe wildfire and insect and disease outbreaks” is considered of greater need than the need to protect roadless values and characteristics, as was defined in the 2001 Rule. What is “severe wildfire”? No definition is included in the Glossary. Is it related to high intensity wildfire? What makes a wildfire “severe”? Is there a difference for “severe wildfire” conditions based on fire regimes or forest conditions? Does “severe wildfire” have the same characteristics for all forest habitat types or all fire regimes or all fire condition classes? What are the “negative effects” to forests from “severe wildfire”? Is not “severe wildfire” a fact of nature, in all fire regimes with the possible exception of fire Regime I? Where are these forests to be protected from “severe wildfire?” If this is a known condition, requiring precedence over protecting roadless characteristics, why is it not mapped in correlation with management themes? What is the relationship between forests to be protected from these severe wildfires and the management themes? The relationship between communities and the “risk of severe wildfire” may be mapped based on WUI [Wildland-Urban Interface] mapping elsewhere in the Idaho DEIS, although our comments will demonstrate this is a flawed analysis. The location and characteristics of forests that need to be protected from severe wildfire are never defined or mapped in the Idaho DEIS. It is impossible to evaluate the environmental effects of protecting for severe wildfire if it is not defined in text or located on a map. The location of roadless forests at risk for severe wildfire must be mapped. (Organization, #1693.9.31000.260)

BECAUSE “PRISTINE” AND “REASONABLE ACCESS” NEED TO BE DEFINED

Please define “pristine” and “reasonable access” as they are related to locatable minerals. (Individual, #1825.9.33000.410)

BECAUSE “ADDITIONAL EMPHASIS” AND “PREVENTION” NEED TO BE DEFINED

The main document of the draft Idaho Roadless Plan document makes mention of noxious weeds, calling roads the “primary vectors for noxious weed establishment and spread.” The claim is that with much reduced road building and additional emphasis on noxious weed management and prevention, there would [be] little cumulative effects from the alternatives in the plan. The plan, however, does not discuss what additional emphasis and prevention mean. (Organization, #1687.7.31000.335)

BECAUSE “SIGNIFICANT RISK” AND “ECOSYSTEM COMPONENTS” NEED TO BE DEFINED

Clarification of the terms “significant risk” and “ecosystem components” should be included in the Final EIS. Specifically, the Final EIS should clarify whether the rule will adopt the definitions from the Healthy Forest Restoration Act (HFRA) Interim Field Guide (USDA/USDI 2004). If that is the intent, it

should be recognized that the HFRA was developed to reduce hazardous fuel loading, not to preserve roadless values. Consequently, the definition should be modified to adequately meet this rule's goals which encompass five management themes. In addition, the Final EIS should clarify what "ecosystem components" are analyzed to determine significant risk and if they carry equal value. (Government, #1692.9.31000.160)

BECAUSE "OLD-GROWTH FOREST" NEEDS TO BE DEFINED

At page 75 [of the Roadless Plan DEIS] and elsewhere you use the term old-growth forests. That term without specific references can mean something different to almost every reader-reviewer. I believe the term will have range of definitions by cover types and other factors defining it and should be referenced rather than ill defined. With ecosystem management driven programs most would use advanced succession stages as the appropriate term. (Individual, #760.22.31000.201)

BECAUSE "THREAT" NEEDS TO BE DEFINED

The term threat needs to be defined. This will determine the consequences of non-action and the resultant wild-land fire and its ecosystems effects. It would be possible to display the potential area based on such a decision. For example, one wind-throw event caused by a micro-burst I am familiar with resulted in a spruce beetle outbreak that affected over 65 percent of this almost 1/2 million acre type on the Payette N.F., north of McCall, Idaho. About 2/3 of the way through the outbreak an escaped fire consumed more than 150,000 acres of that forest cover type, plus it affected other adjacent state and private lands. The fire not only completed the destruction of the spruce fir cover type in the area, it influenced threatened and endangered species habitat. (Individual, #762.4.43000.260)

BECAUSE "FOREST HEALTH" NEEDS TO BE BETTER DEFINED

The Idaho DEIS includes this definition of forest health: Forest Health: The perceived condition of a forest derived from concerns about such factor as its age, structure, composition, function, vigor, presence of unusual levels of insects or disease, and resilience to disturbance. Individual and cultural viewpoints, land management objectives, spatial and temporal scales, the relative health of the stands that make up the forest, and the appearance of the forest at a point that influences the perception and interpretation of forest health. [Footnote 101: DEIS at 327]. This is a very unclear, subjective and convoluted definition of a complex term, using words and phrases that are difficult to understand or to measure, such as "perceived condition - vigor- unusual levels - individual and cultural viewpoints-spatial and temporal scales-relative health-the perception and interpretation of forest health." If roads and logging are going to be permitted in Idaho "backcountry" roadless lands for "routine forest health activities" but not for "routine forest management," there must be a clear, scientific definition of each term. (Organization, #1649.100.31000.260)

The Idaho Rule expands the criteria where the road construction is allowed to include road construction "to facilitate forest health activities permitted under 294.25 C (1)," which is the significant risk clause. The 2001 Rule did not include logging and road building exceptions for forest health, likely because it is not a term or concept with broad acceptance among foresters or the public. The 2001 Rule did not include a definition of the forest health, likely because it was not applied to the FEIS analysis. The Idaho DEIS includes this definition of forest health: "Forest Health: The perceived condition of a forest derived from concerns about such factor as its age, structure, composition, function, vigor, presence of unusual levels of insects or disease, and resilience to disturbance. Individual and cultural viewpoints, land management objectives, spatial and temporal scales, the relative health of the stands that make up the forest, and the appearance of the forest at a point that influences the perception and interpretation of forest health." Idaho DEIS Dec. 2007 p. 327 This is a very unclear, subjective and convoluted definition of a complex term, using words and phrases that are difficult to understand or to measure, such as "perceived condition...vigor...unusual levels...individual and cultural viewpoints...spatial and temporal scales...relative health...the perception and interpretation of forest health." If roads and logging is going to be permitted in Idaho "backcountry" roadless lands for "routine forest health activities" but not for "routine forest management," there must be a clear, scientific definition of each term. (Organization, #1693.41.31000.260)

BECAUSE “FOREST HEALTH ACTIVITIES” NEEDS TO BE DEFINED

You are considering a proposal by the Governor of Idaho to weaken the protective regulations for 6 million acres out of a total of 9.3 million acres of Roadless Areas in the National Forests of Idaho. Those areas now have protection under the Roadless Area Conservation Rule, a national regulation adopted in 2001. The Idaho proposal allows logging and new roads in many places where they would not be allowed under the 2001 rule. It would allow logging anywhere for “forest health activities” which the rules never defines. That alone could cover large acreages because the timber industry thinks all logging contributes to forest health. (Individual, #1560.2.20000.260)

3-182 Public Concern: The Forest Service should provide a clear definition of “road.”

There needs to be a clear definition of “road.” Many of our roads are easily accessible by ATV’s [all-terrain vehicles], motorcycles, SUV’s [sport utility vehicles], and 4x4 pickups. While these roads may not be appropriate for travel by the sedan standard applied, they are regularly used by the people in this area with a wide range of motorized vehicles. (Individual, #1825.10.31000.680)

With regulations being formulated, it will be very important to define in very specific terms what a road is and what a motorized trail is. Since travel will be administered or authorized through the Travel Plan the kind of travel authorized within the various theme areas will be very important. (Individual, #760.28.22300.600)

A clear definition of roads as used in this document should be included in the Glossary. Many people have been misled throughout this process into thinking that there are not roads in these areas. (Individual, #1825.7.31000.680)

TO DISTINGUISH USER-CREATED ROADS, CLASSIFIED ROADS, AND UNCLASSIFIED ROADS

There is a concern that under the current Idaho Rule, user-created and overgrown roads could be used as a rationale for future logging and other industrial uses. The definition of a road in Section 294.21 of the Idaho Rule is inadequate as it lacks distinction among user-created roads, classified roads, and unclassified roads. As written in the Idaho Rule, the definition of a road is problematic and will encourage abuse. A district ranger or U.S. Forest Supervisor could designate unclassified roads as “forest roads” without notice. Under the 2001 Rule, such reclassification of existing “unclassified” roads is considered road construction. No analysis of this issue is provided in the preamble or the DEIS. Further, no distinction is provided on the miles of classified vs. unclassified roads that currently may exist in Idaho Roadless Areas. (Recreation/Conservation Organization, Missoula, MT - #1796.7.31000.680)

TO CLARIFY WHAT IS MEANT BY A TEMPORARY ROAD

The Idaho Rule needs to specifically define what constitutes a temporary road, how long that road will remain on the landscape, what standards will be used in construction, who will remove the road, how it will be removed, and how the USFS will conduct long-term monitoring to ensure [that] the road is completely reclaimed and vegetation restored. A commitment to long-term funding for road monitoring and illegal off-road vehicle use enforcement should also be provided before any roads are constructed. (Recreation/Conservation Organization, Missoula, MT - #1796.12.31000.680)

3-183 Public Concern: The Forest Service should define “substantial alteration”.

TO CLARIFY WHEN PERMANENT ROADS WOULD BE AUTHORIZED

The draft Rule at [Section] 294.23(b)(vii)(2) authorizes permanent roads if they will not, “substantially alter roadless characteristics as defined in this proposed rule.” No discussion is provided as to what would constitute a “substantial alteration.” (Preservation/Conservation, Boise, ID - #4156.152.31000.680)

3-184 Public Concern: The Forest Service should explain how the percentage of Roadless Area is calculated.

How is the percent [of] roadless calculated? (Individual, #1825.43.31000.680)

3-185 Public Concern: The Forest Service should correct the spelling of Paiute on page 263.

Chapter 3 pg 263: Paiute is misspelled. Please note this and revise for future documents. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.111.21200.001)

Compliance with Other Laws and Regulations**3-186 Public Concern: The Forest Service should explain the changes to the National Forest Management Act, NEPA, and the Wilderness Act that would result from the Idaho Roadless Rule.****BECAUSE THE PROPOSAL WEAKENS PROTECTIONS PROVIDED IN FOREST PLANS**

Is this a document and decision intended to recommend wilderness or avoid recommending any wilderness in Forest Plan revisions? If either, why isn't the DEIS honest in detailing this proposal as a major change in NFMA [National Forest Management Act] and NEPA regulations and possibly the Wilderness Act? This issue is crucial because the proposal weakens current plan direction. Forest plans are proscriptive documents in that they set sideboards such as standards and guidelines. Unlike the 2001 Rule, this Rule is a ceiling, not a floor. The 2001 Rule did not weaken existing protections in Forest Plan, as this proposal would do. (Organization, #1800.14.31000.130)

3-187 Public Concern: The Forest Service should consider Revised Statute 2477 in the analysis of the Idaho Roadless Rule.**TO ANALYZE THE IMPACT ON TRAVELWAYS UNDER REVISED STATUTE 2477**

There is a complete lack of consideration administratively to deal with county and other assertions for proclaimed travel-ways under RS 2477. Some of these assertions bisect small parts or complete Roadless Areas. Reducing some [of] them to less than the 5,000 acres, determined to be the minimum size for Roadless Area identification. These assertions should be identified as part of any assessment and it would be appropriate to identify these travel ways so that potential impacts from Quiet Title actions are identified. (Individual, #762.8.22110.100)

BECAUSE ONLY AN ACT OF CONGRESS CAN REMOVE HISTORIC RIGHTS-OF-WAY

There are areas within Valley County that have historic rights-of-way that even this document cannot change. Only by an Act of Congress may these historic rights be removed from the land. These right-of-ways are quite commonly called RS 2477 routes as they predated the preservation of the National Forest and provided the needed access for the public to reach their property, mining claims, post offices, homes, ranches, villages, etc. (County Government Agency/Elected Official/Association, Cascade, ID - #7990.2.22110.680)

TO ENSURE THAT LEGAL ACCESS IS PRESERVED UNDER THE ASSIGNED MANAGEMENT THEMES

In many Forests, the established assertions under RS 2477 went unrecognized, even currently. Federal mail roads into historic areas are overlooked creating a problem for the counties and the State to ensure that legal access remains under the assigned themes of the proposed Roadless Rule. These claims have not been adjudicated so they cannot be ignored. The Idaho proposal should not create a legal dilemma for the State or the counties. (Individual, #760.5.22110.100)

3-188 Public Concern: The Forest Service should comply with the National Forest Management Act.

BECAUSE MANY CONCERNS RELATED TO THE ACT ARE NOT ADDRESSED

Since the DEIS essentially is a Forest Plan revision, it also fails to address the following concerns in context of NFMA [National Forest Management Act]: Diversity, old growth, etc. Management indicator species Water quality Research needs Timber Restocking Roads Visual quality Wilderness evaluation ORV management Insects and disease Inventories-habitat, recreation, RNAs [Research Natural Areas] Integrated pest management Long-term sustained yield Minerals Monitoring Planning Rehabilitation Roads, economics, effects, revegetation Soils Fisheries. For example, the DEIS does not mention grizzlies in the Clearwater drainage even though they are confirmed to be there. The impacts on all TES [threatened, endangered, and sensitive] species are poorly addressed. (Organization, #1800.19.31000.133)

BECAUSE INDIVIDUAL ENVIRONMENTAL ANALYSES SHOULD BE PERFORMED FOR EACH INVENTORIED ROADLESS AREA

The Tribes [Shoshone-Bannock] demand that the FS [Forest Service] re-evaluate the importance of the CTNF [Caribou-Targhee National Forest] lands by performing an individual environmental analysis for each IRA [Inventoried Roadless Area] in the CTNF. This demand is in line with the FS mandate in NFMA [National Forest Management Act] to provide for biological diversity. (Tribal Government/Elected Official/agency, Fort Hall, ID - #6546.76.30000.133)

BECAUSE DETERMINING WHETHER NATIONAL FOREST MANAGEMENT ACT PRECEDENTS HAVE BEEN FOLLOWED IS NOT POSSIBLE WITH INFORMATION PRESENTED IN THE DEIS

The Roadless Area boundaries have been changed without going through public input. There is no rationale for most of the changes and what is available is not adequate. There is simply an allegation that the enjoined 2005 NFMA [National Forest Management Act] planning regulations (which are not operative) have been followed. However, there is a body of case law and congressional direction dating back to the [19]70s regarding how roadless inventories are supposed to proceed. The information in the DEIS is so insufficient it is impossible to tell if that has been followed. (Organization, #1800.26.31000.620)

Chapter 4: National Forest Management and Resources

Management of Roadless Areas

Protection of Roadless Areas: Process Concerns

4-1 Public Concern: The Forest Service should protect Roadless Areas.

TO AVOID LITIGATION

Anything short of this goal [of protecting Roadless Areas] will end your career early in a Federal court. (Individual, #69.4.40000.130)

TO BE CONSISTENT WITH THE PUBLIC WILL

These wildlands' value as wildland, as natural habitat, as protected sources for clean water, as natural air purifier, as recreation opportunities, are worth far more than the short-term economic gain that might come from the logging, mining, oil and gas development, and other industrial activities allowed by the Idaho petition. Roadless Areas on all national forests are public lands, belonging to all Americans, and should be managed in accordance with the public will that they remain wild. (Individual, #147.2.10400.2)

BECAUSE ROADLESS AREAS BELONG TO ALL AMERICANS

I want all of it [Idaho's National Forests] protected as wilderness. I want all of it to remain roadless. Every remaining piece of national land needs to be protected at a national level for ALL citizens of our country. This should not be an "Idaho" plan. It is "National" land and deserves national protection. (Individual, #331.2.10110.200)

BECAUSE AMERICANS ARE OVERWHELMINGLY IN FAVOR OF PROTECTING ROADLESS AREAS

Concerned Americans commented overwhelmingly in favor of protecting the roadless nature of these lands for the simple reason that they do not want the costs and damage of adding more roads to the Federal system already unable to maintain the roads and motorized "wreckreationists" currently using and abusing our public lands. These roadless lands are far more valuable as habitat and watershed than they are as commodity. These are the most remote places with the most fragile and important refuge for man and nature we should never allow to be torn up. These lands are healthy and productive because of their roadless nature—we have not screwed them up yet. Please vote to maintain their roadless protections. (Individual, Bend, OR #732.3.40000.800)

Protection of Roadless Areas: Social Concerns

4-2 Public Concern: The Forest Service should protect Roadless Areas.

TO PRESERVE THE NATIONAL HERITAGE

I am writing to express support for the protection of Idaho's remaining natural roadless areas as they are. These 9.3 million acres of undeveloped backcountry National Forest areas are very valuable as our national heritage, crucial fish and wildlife habitat, incredible recreational areas and origins of our drinking water. These lands belong to all Americans and need to be protected before they are forever damaged by logging, roadbuilding, mining and development. (Individual, #231.1.20000.200)

TO PRESERVE CULTURAL RESOURCES AND SPECIES WITH CULTURAL IMPORTANCE

Species such as the salmon, steelhead, grizzly bear, and buffalo that are of high cultural importance have become extinct or close to extinction in Idaho. However, Idaho's Roadless Areas still remain some of

the last places where many wild animals, fish, plants, and other cultural resources are still present as they were before European contact. Retaining these features and enhancing degraded natural ecological processes is best achieved by preserving the areas that have not been altered significantly by consumptive uses (e.g., mineral and road development, livestock grazing, timber harvest, and unnatural vegetation manipulations) and allowing natural processes to occur without human intervention. The message we are trying to emphasize here is that there are still members [of the Shoshone-Bannock tribes] such as ourselves, who rely upon these lands for subsistence and religious purposes and consider Mother Nature as the best manager of the ecosystem. (Individual, #205.1.40000.760)

FOR FUTURE GENERATIONS

The Roadless Areas in the National Forests are one of the most important and effective means by which the original, and still most important, concept of the National Forests, and other Federal land protection, can be carried through. That is, the idea that future generations will be able to enjoy and study little pieces of our almost-vanished natural heritage in as close as possible to the condition in which we found it. (Individual, #20.1.40000.740)

As Nez Perce people, we believe that we didn't inherit the earth, that we borrow it from those generations seven generations distant. It is for them that we manage these lands. We have millions of acres that exist today. The wilderness area that we're talking about today, 75 percent of that land is my homeland, the land that I access, and I want my unborn grandchildren to access, to have the same experience that I had. No, I don't speak for the tribal government. I know they have other concerns than I do. But also, I use this land, unlike the tribal government, as my people have always used. I hunt and fish and gather in the way that I was taught to by my forefathers. And so I ask you to protect this land in a way that was intended by the Treaty of 1855. (Individual, #218.16.22120.760)

Future generations will thank us for having preserved these areas. I urge you not to remove the protection for wilderness areas in Idaho. (Individual, #40.2.40000.740)

Idaho has millions acres of national forest Roadless Areas—the most of any state besides Alaska. As these wildlands become scarcer, we need to look to the future regarding what wildlands we have left. These areas belong to all Americans, and managing them conscientiously will be for future generations. (Individual, #21.1.40000.740)

BECAUSE NATIONAL TAXPAYERS WANT THEM PRESERVED FOR FUTURE GENERATIONS

Idaho seeks development of land owned by national taxpayers who have paid taxes for eons to support it. The national taxpayers want to save that land for their children and not “develop” it so that Idaho can pollute and destroy it. (Individual, Florham Park, NJ #214.6.10110.127)

TO PROTECT THEIR ECOLOGICAL AND AESTHETIC VALUES

These largely unaltered conditions make the “roadless” lands priceless as both unique ecological baseline and irreplaceable aesthetic treasure. The greatest good of preserving the unaltered character of these landscapes for current and future generations must be recognized as the only responsible action consistent with the mission and stewardship responsibilities of the U.S. Forest Service. (Individual, #832.2.40000.2)

BECAUSE HEALTHY ECOSYSTEMS PROMOTE HUMAN HEALTH, SUSTAINABLE LOCAL ECONOMIES, AND AESTHETIC BEAUTY

Preserving these lands for future generations provides benefits to communities. Wilderness nourishes healthy ecosystems and therefore promotes human health, it creates a sustainable local economy, and it preserves aesthetic beauty. Once wilderness is ruined, it is gone forever, and the used up lands will never make money again, nor be enjoyed by visitors in years to come. (Individual, #921.1.40000.800)

TO PROTECT THEM FROM THE EFFECTS OF RAPID POPULATION GROWTH AND DEVELOPMENT

I am writing to express my support for the protection of Idaho's remaining roadless lands. It is crucial to take a stand on preservation at this time when Idaho is experiencing such rapid and sprawling growth. I

urge the use of foresight that we may keep our lands and our own future well being intact. (Individual, #210.1.40000.740)

Idaho's population grows rapidly and the pressures on these rugged backcountry areas will increase. It is critical to provide future generations the same opportunities we have had to experience Idaho's natural areas. These special places belong to all—protect them as they are today. (Individual, #204.2.40000.740)

BECAUSE THESE AREAS PROVIDE RESPITE, RECREATION, AND HISTORICAL SYMBOLISM

Preserving the land will last for generations and benefit thousands of people. As our country becomes more developed in city areas, we need to preserve places such as the Roadless Areas throughout the country for respite and recreation as well as a historical symbol of the beauty seen by our forefathers. (Individual, #1116.3.40000.700)

BECAUSE THEY PROVIDE SOLITUDE, QUIET, AND PEACE

As these pristine wildlands become scarcer, we need to think ahead to guard those quiet, special places of solitude where we can escape the noise and stress of everyday life. These areas belong to all Americans and should be managed carefully for generations to come. Idaho's backcountry should remain as it is. (Individual, #632.2.40000.700)

TO PRESERVE WIDE-OPEN, WILDLAND

Wide-open, wildland is one of the greatest assets of our great country; one that it was founded with. There are increasingly few places in the world where one can truly get away from the anthropogenic world and experience a world that exists peacefully without humans. The land [in the Idaho Backcountry] is not without value in the state that it is in. (Individual, #135.4.40000.770)

TO PROVIDE PLACES FOR SPIRITUAL RENEWAL

As a person with MS, I am not able to do much traveling at all, let alone much travel into the backcountry. But I take heart in a profoundly spiritual way knowing it is there, and knowing I am connected to it. The times I have been assisted into it have literally changed my life. Please honor the irreparable value these places hold to most people in this nation and to the future of all life on the planet, and allow yourselves to see that there are other solutions available for economic progress, innovation, and human need, use and design. (Individual, #4.6.71000.203)

Solitude and introspection rebuild the soul. This can be achieved in a dark room, or, for an active guy like me, hiking and camping solo in our National Forests. If only for the experience of what is clean as opposed to the filth of city or town, the remaining forests should be left undeveloped. (Individual, #246.2.40000.770)

Each area of the country has places to inspire, but the western states, far and away, have the most inspirational value. These were the places [that] challenged us as a growing nation and that inspired Teddy Roosevelt and others to preserve them. It hurts our spirit as a nation, now and in the future, to have them treated as dollars and cents on a balance sheet. Do your job as the people that the people hired to act as stewards over these places [Idaho Roadless Areas] and end this larceny. (Individual, Bellflower, CA, #6554.6.10440.770)

TO ALLOW FOR SCIENTIFIC DISCOVERY

This plan is dangerously short-sighted on many levels. These areas are essential biological and ecological and even spiritual laboratories where close study of how things occur in nature can lead us to solutions that will improve and even save the quality of human life on our planet, which is interdependent with, not superior to, the web of natural process. Some of us believe God invented nature. In any event, we did not invent nature; nature, in its generous intelligence and wisdom, invented us. Therefore, we need to honor it, and learn from it, by studying and mimicking what it has to teach us about its own ingenuity to survive and to thrive. This is done not by mining materials for our use that seem to present a temporary solution to continuing our lifestyles, but by observing and mimicking these

processes, which do not produce toxins or carcinogens, but instead “recycle” all materials back into the web of life. (Individual, #4.4.40000.710)

Forests are homes to many species, including plants that could be used for medicine. (Individual, #522.5.41600.820)

Not only do our [wild] forests contain medicinal plants, but there are species that have yet to be discovered. (Individual, #538.6.40000.820)

BECAUSE THE IDEA OF WILDERNESS JUSTIFIES THEIR PROTECTION

Consider Wallace Stegner’s words to Congress in 1963 in support of the adoption of the Wilderness Act. He reminded the senators that there does not need to be a “reason” to protect our natural landscape. This concept may be difficult to grasp, since it does not depend on utility as a justification. But Stegner’s words bear repeating more than ever in a world so bound up in turmoil and whose resources are quickly wasting away. He told them, “What I want to speak for is not so much the wilderness uses, valuable as those are, but the wilderness idea, which is a resource in itself.” The mere “idea” of wilderness justifies its protection. (Individual, #161.7.40000.203)

BECAUSE SO LITTLE REMAINS

Just a quick comment on Roadless Areas. The U.S. has, over the years, destroyed so much of our natural environment that it is imperative that we save as much as we can of what very little remains. It may seem only a little encroachment here and there; but when we step back and look at the big picture we can see how much damage we have done. Our grandchildren will thank us for saving some land in its untrailed, untrampled glory. Please be one of the ones that are working to save wildlands. (Individual, #75.1.40000.740)

All of America’s Roadless Areas and Wilderness Areas must be kept that way! There is little enough of America with this/these designation(s) already. (Individual, #249.1.40000.620)

BECAUSE THEIR HIGHEST VALUE IS THEIR PRISTINE CHARACTER

I know firsthand that opening roadless lands to any form of direct and active resource management will inevitably and irreversibly diminish the highest value of those landscapes—their pristine undefiled character. (Individual, Yreka, CA, #832.1.40000.206)

Please prohibit our remaining pristine roadless lands from desecration by “development” or “active stewardship”—they are rare examples of naturally ordered perfection, deserving our highest respect and protection. (Individual, Yreka, CA, #832.3.40000.770)

BECAUSE PRESERVING THEM IS PART OF CHAMPIONING HUMAN RIGHTS

Preservation of these forests is part of championing human rights. (Individual, #592.5.40000.780)

Protection of Roadless Areas: Economic Concerns

4-3 Public Concern: The Forest Service should protect Roadless Areas.

BECAUSE THE LONG-TERM COSTS ARE GREATER THAN THE SHORT-TERM ECONOMIC BENEFITS

Environmental destruction needs to cease. This planet needs to be taken better care of. [The] breakdown of environmental protection and laws sets [a] dangerous precedent. Short term this may make money, provide jobs or whatever your reason. [But in the] long-term it harms our environment beyond repair. Please uphold all environmental protection and laws. Save our planet. We’ve wasted all of it we can afford. Saving every little bit of it counts. (Individual, Long Beach, CA, #553.5.20000.700)

**BECAUSE LOCAL ECONOMIES BENEFIT MORE FROM TOURISM
THAN FROM EXTRACTIVE INDUSTRY**

If these areas are opened to open-pit phosphate mining development and logging, fishing and hunting opportunities will be seriously and negatively impacted. The mining and logging companies will make millions but the residents will lose millions of dollars generated into the economy from the loss [of] tourists coming to fish and hunt. Roadless Areas are important to the economic future of Idaho and the country. (Individual, Viola, ID, #226.2.70000.870)

TO INCREASE TOURISM IN IDAHO'S RURAL MOUNTAIN TOWNS

For Idaho's rural mountain towns, local Roadless Areas can be a resource for increasing tourism and its economic benefits. Literature and advertising frequently promote some of these towns as 'gateways' to Idaho's large Wilderness Areas. While towns like McCall, Challis, and Salmon are among the nearest communities to the Frank Church RONRW [River of No Return Wilderness], they are actually 30–50 road miles and/or 2 hours (driving time) from many of the trailheads. However, there are IRAs [Inventoried Roadless Areas] in closer proximity to these towns. If protected, better managed, and promoted, they could attract more visitors and tourism revenue to these communities. This concept is demonstrated in the Wood River Valley towns, where adjacent high-quality Roadless Areas are very popular. While the State Plan does assign the WLR and Primitive themes to roadless lands near McCall and Cascade, it omits these more protective themes from Roadless Areas near Salmon, Challis, and other mountain communities. (Individual, #1695.18.63000.890)

TO PROVIDE THE OUTDOOR LIFESTYLE THAT ATTRACTS EMPLOYEES

I am writing in support of stronger protections for Idaho's remaining roadless lands. I'm an avid hunter and fisherman, and my primary reason for living and working in the state of Idaho is for the privilege of hunting its wild country as a resident. As the owner of a small business in Idaho Falls, I'm keenly aware that the quality of the outdoor lifestyle we enjoy here can be a strong factor in attracting and retaining top quality employees. Our wildlands and wild rivers are the key ingredient of the lifestyle. (Individual, #137.1.40000.800)

BECAUSE CORPORATE INTERESTS SHOULD NOT OUTWEIGH PUBLIC INTERESTS

We must not allow National Forests to be spoiled for everyone for the profit of a few. (Individual, #480.6.40000.127)

Protect Idaho's National Forests! Private interests should never trump the public interest. Period. (Individual, #401.5.40000.127)

**BECAUSE ROADLESS AREAS GENERATE TOURISM AND CONTRIBUTE
SIGNIFICANTLY TO LOCAL ECONOMIES**

In most of the spectacular settings, throughout the west, adjacent to untouched National Forests there is a progression of building booms. These building booms in proximity to Boise, Spokane, Medford, Missoula, Flathead, Bend and Bozeman are in most cases the number one reason for economic resurgence in these areas. People fueling these economies are not (by in large) moving in and building a home for logging or mining jobs. [There is] a resurgence in these areas because of a high quality of life in a beautiful setting! Pristine USFS lands yield a huge virtue to the adjacent communities as witnessed in those places listed above: water quality and fish population protection, bird-watching, fishing, hunting, solitude, clean air, spectacular vistas, etc. This is not some hippie joke. It is why these western towns are growing; beauty sells! Protect the beauty. (Individual, #243.2.40000.800)

Roadless Area protection is not only important for plants and animals, but also for many Montana and Idaho businesses—from mainstream retailers to our backcountry outfitters and guides. Outdoor recreation is a sustainable economic driving force for many local communities that depend on Roadless Areas for success. Wildlife-related tourism alone contributes an estimated \$1.7 billion to Montana's economy each year, and with Idaho mere minutes away, the Roadless Areas there are critical to our economy as well. As other states become more developed, remaining roadless wildlands will become an even larger economic asset if maintained as roadless. (Organization, #951.4.40000.800)

FOR THE BENEFIT OF LOCAL BUSINESSES

Many people that support my business come to this area to recreate and enjoy the quality of these pristine areas. As a business whose customers benefit from the recreational opportunities our National Forests provide, we consider Roadless Area protection essential to the future of our environment, economy, and community. (Organization, #951.2.70600.200)

BECAUSE THE AGENCY CANNOT AFFORD TO MAINTAIN EXISTING ROADS

These are wild forests, and they should be kept so for the following reasons, among others:

Retaining the Roadless Areas will save money. Roads and other developments into Roadless Areas are expensive. With 380,000 miles of existing roads in our national forests, and with an estimated \$8.4 billion backlog needed for their maintenance and reconstruction, we cannot afford to build roads into Roadless Areas, even if there were no other reasons not to. (Individual, #1456.15.40000.800)

*Protection of Roadless Areas: Natural Resources Concerns***4-4 Public Concern: The Forest Service should protect Roadless Areas.****TO PLACE LONG-TERM ENVIRONMENTAL BENEFITS ABOVE SHORT-TERM ECONOMIC GAIN**

It shows our ability to think long-term when we do things like preserving Roadless Area protections. Any country or society can exploit their natural resources, stripping them for short term profit. It takes a great society to restrain itself and let nature continue as it would were humans not changing the landscape. These areas belong to all Americans, and managing them conscientiously is of great importance to me. (Individual, #155.1.10400.2)

Step by step, we are killing the planet we live on for short-term profit. We need to step back and carefully consider whether it is in the best interests of not only Idaho, but the United States and the world, to allow current destruction and future increases of destruction of our precious natural resources for the sake of corporate profit. (Individual, #803.2.40000.700)

TO RESTORE THE BALANCE BETWEEN PROTECTION AND DEVELOPMENT

All things work best if balanced and the balance of wilderness vs. civilization's assaults needs to be continuously monitored. Added to all of Bush's other failed policies is his dismal track record with the environment—a legacy of imbalance. Let's maintain the remaining wilderness areas! (Individual, #1095.1.40000.700)

“The earth does not belong to man; man belongs to the earth. All things are connected, like the blood that unites us all. Man did not weave the web of life; he is but a strand in it; whatever he does to the web, he does to himself.” Chief Seattle. It's obvious with the problems we are facing right now—global warming, pollution, deforestation—that we are not living in balance with the earth. We need to listen with our hearts to the words of this very wise Native American. We need to stop the rape and plunder of the earth now before it's too late—if it's not already. I think we should place Native Americans in charge of our natural resources; they have always respected all life. They know how to live in balance with the earth. Keep Idaho's National Forests protected; we need all the wildlands we have. Please vote against any legislation that allows these lands to be exploited. (Individual, #1034.5.40000.760)

TO AVOID THE ENVIRONMENTAL DAMAGE CAUSED BY EXTRACTIVE INDUSTRIES

We must not open these areas to despoiling by private companies. The free market does not include the damage to our environment in their “costs.” Private companies maximize their profits by destroying the environment and poisoning our water, which will later require hundreds of billions to repair. However, no amount of dollars can repair the damage done to the kids who live in these areas. Those who enable the exploitation of our world for private profit will pay for it in eternity. (Individual, #342.1.40000.57)

It is well known, nationwide, what mining and logging have done to the environment in Idaho, particularly to Idaho's rivers and streams that are polluted with toxins, and the effect such operations and toxins have on the aquatic biota, wildlife, and humans. In many areas it is no longer safe for people to even fish those streams and rivers. The idea that further degradation would be allowed on Federal public lands, the lands we taxpayers pay for and support to safely recreate in and use, is unfathomable. Outrageous. (Individual, #1302.2.40000.2)

TO PROTECT ROADLESS AREAS FROM EXTRACTIVE USES

It is imperative that Idaho's magnificent and ecologically critically important national forest roadless lands not be sacrificed to the greed of mining, logging, oil and gas development, and roadbuilding interests. All 9.3 million acres of Idaho's roadless lands must be protected! (Individual, #88.1.40000.2)

BECAUSE THE NATION'S WOOD FIBER NEEDS ARE MET BY PRIVATE LANDS

These six million acres of Idaho's National Forest are no place for logging, mining, and roadbuilding, especially when we don't even need the wood fibers that come off National Forest land. When most of our wood needs are met by private lands, there is no reason to ignore the will of over 2 million Americans who have made their desire known. I urge you to protect these rare, pristine roadless forests in Idaho and around the nation (Individual, Mount Rainier, MD, #220.3.40000.060)

BECAUSE UNSUSTAINABLE USES SHOULD NOT BE PERMITTED

Exceptions to roadless rules should definitely not be granted for mining or other destructive and polluting endeavors. We should not sell out our public interest in our Roadless Areas for any activities that are not sustainable (e.g., mining for finite resources) and are not in the best interests of future generations of Americans. (Individual, #1311.3.40000.700)

BECAUSE OPENING THESE LANDS TO EXTRACTIVE INDUSTRIES SERVES ONLY GREED

As someone who was born and raised in the West, and who plans to return there, I feel a deep connection to the land and the people. I say no to opening up Roadless Areas in Idaho! Opening them up to logging, mining, oil and gas development serves no one but the greedy businesses whose bottom line only reflects their profit margin and serves nothing of the common good. (Individual, #247.6.40000.720)

TO PROTECT THEM FROM BEING POLLUTED

The Bush plan to open up public lands to mining and timber interests would be a disaster. It would sacrifice the rights of farmers, hunters and others who have an interest in having a clean environment. Our public lands belong to all of us. Keep the polluters out! (Individual, #348.1.40000.50)

BECAUSE ROADS ARE NOT NEEDED TO PROTECT THE FOREST

Don't try to fool the public by stating that roads are needed for forest protection; that is untrue, as the forests have been surviving on their own for geologic time. (Individual, #186.2.10440.260)

BECAUSE ECONOMIC PROGRESS AND CONSERVATION NEED TO BE TREATED AS THE SAME GOAL

With the states now having the responsibility to report to Washington on its plan for Roadless Areas, now is the time to disconnect our decision making from "extraneous political ideology" and "move toward the common ground where economic progress and conservation are treated as one and the same goal." (E. O. Wilson, *The Future of Life*, at 155). No state is more perfectly suited to lead the way. Your positive affirmation of support for the protection of our roadless land, of our values, will resonate. Please consider Idaho's future and our valuable heritage and take action to protect our roadless land. (Individual, #161.9.40000.700)

If we protect these Roadless Areas and the wildlife habitat, we will in turn protect quality recreation and clean water for fishing, rafting and more. This is the most important single thing we can do today to encourage sustainable economies for tomorrow. (Individual, #276.3.40000.870)

TO PROTECT THEM FROM THE EFFECTS OF EXPLOITATION AND DEVELOPMENT

There is no uncertainty about what is going to happen to Idaho's Roadless Areas if they are opened to new development. Past experience has shown us that mining companies reap the rewards of the land, free, while leaving us with pollution in our hills and in our lakes for centuries. Timber companies do not log in a sustainable manner and present trends are to clearcut the forests and sell the land at a high price for its recreation value to investment developers. Land that has been free-range for wildlife and generally open to the public will be sold, leased, fragmented, gated, and locked up. Big game habitat and migration routes will be disrupted or destroyed.

My husband and I have hiked, hunted, and fished mountain lakes from Avery, Idaho, to the Cabinet Mountains in Troy, Montana, and the Selkirk Mountains in the Sandpoint area. We have seen what happens to the backcountry when roads have been put in and logging companies ravage the hills. It takes 50 to 75 years to have a productive forest again and timber companies aren't willing to wait that long for another return on their investment. Mining companies just take from the earth and return nothing. What has been taken is gone forever. (Individual, Sandpoint, ID, #6204.2.70000.200)

*Protection of Roadless Areas: Environmental Concerns***4-5 Public Concern: The Forest Service should protect Roadless Areas.****AS A HEDGE AGAINST CLIMATE CHANGE AND THE RESULTING ENVIRONMENTAL DISASTERS**

America has destroyed and developed and logged far too much of its formerly protected lands as it is. With climate change, the damage has led and will continue to lead to mud slides, destroyed and damaged roadways, flooding, and community destruction. We need to protect our pristine habitats. (Individual, #172.2.40000.002)

BECAUSE THEY ARE "THE LUNGS OF THE WORLD"

All National Forests must be protected for they are the lungs of the world. (Individual, #492.5.40000.250)

BECAUSE THEY PROVIDE CRITICAL HABITAT AND CLEAN WATER AND AIR

I am a citizen concerned about how our Federal, state and local governments seem to have no concern for our quickly vanishing natural areas. These natural resource areas provide more than a cash cow for our government, they provide critical habitat and clean water and air for our vanishing wildlife and native plant species. It is unthinkable that our government would allow mining and deforesting of these valuable areas, this type of activity permanently alters these areas and causes irreversible damage. (Individual, #800.1.40000.2)

TO PROTECT HUMAN HEALTH AND A PROVIDE A HEDGE AGAINST CLIMATE CHANGE

Conservation biologists are confirming with every study the value that these areas hold for human health—and human health is critically dependent upon a healthy environment. In January 2001, the Secretary of the Interior directed land management agencies such as Bureau of Land Management, Forest Service, National Park Service, and U.S. Fish and Wildlife Service to "consider and analyze potential climate change effects in management plans and activities." How better can we deal with environmental uncertainty than to "hedge our bets" and save these lands from development. (Individual, #844.2.40000.250)

TO PRESERVE CLEAN WATER AND FOREST RESOURCES AS A HEDGE AGAINST CLIMATE CHANGE

Idaho's pristine, roadless, undisturbed forests are needed more than ever, if only to protect and preserve precious water supplies and resources that will become vital for communities and populations, including wildlife populations, when the effects of climate change intensify. At this time the very thought that any governmental agency would even consider opening protected roadless wilderness areas—that would risk degrading such vital resources—is unbelievably short-sighted and incomprehensible. Every step should

be taken to protect and preserve such wilderness, particularly wilderness on all state and Federal lands. (Individual, #269.3.40000.201)

TO PROVIDE A HEDGE AGAINST CLIMATE CHANGE

Reducing the restrictions on our National Forests is the wrong direction to take our country. During a time when we are seeing more and more scientific evidence revealing how much humans have impacted the natural world and thus leading to climate change, we should be spending more time protecting what wild areas we have left. (Individual, Pocatello, ID, #1462.1.40000.250)

With global climate change threatening our only livable planet, we must keep our protected forests intact as carbon sinks and carbon filters, not to mention their importance as sponges to retain the water released by decimated tropical rainforests that otherwise would cause catastrophic floods. (Individual, Talent, OR, #3058.1.40000.250)

Building roads for resource (carbon) extraction at a time when the world is realizing we need to reduce carbon emissions is wrong, backwards and just plain silly. Leave the carbon locked up in the trees, coal and natural gas and out of our atmosphere. (Individual, Port Townsend, WA, #4310.2.64100.250)

BECAUSE HEALTHY ECOSYSTEMS PROVIDE CLEAN AIR AND WATER AND SUPPORT WILDLIFE

It is important that we preserve our environment. We have opened so much to development that we are endangering our own future. A healthy ecosystem is needed to filter carbon out of the air. A healthy ecosystem is needed to prevent runoff of top soil in the rains. A healthy ecosystem is needed to filter clean water. Contiguous wilderness is needed to ensure the survival of wildlife. It is too important to be left up to corporate interests. (Individual, #1023.5.40000.201)

BECAUSE ROADLESS AREAS HAVE HIGHER ECOLOGICAL INTEGRITY, MORE BIOLOGICAL DIVERSITY, AND HEALTHIER SPECIES POPULATIONS THAN ROADED AREAS

These are wild forests, and they should be kept so for the following reasons, among others:

The national forest Roadless Areas encompass the land with the most biodiversity, the healthiest ecosystems, and the best wildlife habitats. Saving wildlands is necessary for the retention of diversity, and diversity is important to ecosystem health and therefore to us humans. Contrary to claims by the timber industry and some politicians, the Roadless Areas are not unhealthy. Just the opposite.

Biologists have found that Roadless Areas generally have better forest health than the roaded parts of the national forests. For example, the scientific assessment done for the comprehensive Interior Columbia Basin Ecosystem Management Project (ICEBMP) in 2000 confirms that the roadless lands generally have higher ecological integrity, more diversity, and healthier populations of many wildlife and fish species than the developed parts of national forests and BLM land. (Individual, #1456.10.41600.201)

TO PROTECT THEM FROM ENVIRONMENTAL DEGRADATION CAUSED BY INCREASING POPULATION

I am an individual whose family has owned land in the Carson National Forest of New Mexico for 50 years and have seen the casual misuse of National Forest by the public. Of course, if there had been no road into that region we would not have owned a cabin inside that beautiful mountain area. The mining, logging, and now 4-wheel-driving abusers have certainly taken a great toll on the area. In our changing environment and with an ever-increasing population, I think it is even more important that old forests be vigorously protected from capitalist endeavors and the ever-intruding human who disrespects the irreplaceable nature of the natural resources there. (Individual, #157.4.40000.200)

Please save the forests in Idaho and the rest of the nation. Worldwide overpopulation is the basic cause of our environmental problems. Also support ending the Bush gag rule and fully funding UN [United Nations] family planning. Voluntary birth control is the answer to saving the planet. (Individual, #1371.5.40000.700)

BECAUSE THE NATURAL BEAUTY OF THESE AREAS IS IDAHO'S GREATEST ASSET

Idaho's greatest asset is the natural unmolested beauty of its lands. The St. Joe and Coeur d'Alene river basins and the high mountain areas are my favorite areas. Our wildlife thrives when we leave their habitat alone. (Individual, #173.2.40000.350)

TO PROTECT WILDLIFE HABITAT AND BIODIVERSITY

Idaho's Roadless lands are both a natural legacy to be handed down from one generation to the next and they are nationally significant. The wild and pristine lands of southeast Idaho comprise some of the most important and biologically diverse areas in the Greater Yellowstone Ecosystem. The region's vast tracts of roadless forests located on the Caribou-Targhee National Forest are home to hundreds of species of wildlife, including moose, elk, mule deer, gray wolf, and lynx. These wildlands are widely recognized by scientists across the nation and in Idaho for their biological diversity and importance. [Footnote 1: 1 See, e.g., Noss, R, Wuerthner, G., Vance-Borland, K., Carroll, C. 2001a. A Biological Assessment for the Greater Yellowstone Ecosystem. 137 at Maps. Appendices]. (Organization, #1649.3.40000.310)

Loss of biodiversity is a major threat to human security. Decisions made now will affect the well being and even the survival of our grandchildren and their grandchildren. Idaho's roadless backcountry is the core of the last intact forest ecosystem in the lower 48 states, where native plants, fish, and wildlife, from the smallest plant to the largest predator can still be found. "In our every deliberation, we must consider the impact of our decisions on the next seven generations." (From the Great Law of the Iroquois Confederacy) (Individual, #108.4.41600.740)

These areas are also important in their own right as habitat for wildlife and an environment for biodiversity. With the shrinking of wild areas from population growth and the need for forests to help keep the global environment healthy the idea of encroaching further on Roadless Areas seems nearsighted and not well balanced for the circumstances we live in today. (Individual, #284.2.41000.2)

TO PROTECT WOLVES

I live in South Carolina and am not familiar with Idaho, but I do support any causes that protect our National Forests and its inhabitants. I especially would like you to protect the wolves. Without the animals, the forests are dead. Please protect the wolves. (Individual, #76.1.41300.310)

TO PRESERVE THREATENED AND ENDANGERED SPECIES

Many threatened and endangered species, such as salmon, steelhead, and bull trout, rely on Idaho's Roadless Areas and the streams found there for spawning. It is critically important to protect these vital ecosystems by safeguarding these Roadless Areas from further disturbance from roadbuilding, mining, and logging. (Organization, #2361.2.70000.355)

Idaho's Roadless Areas support rare and endangered species like the wolf, grizzly bear, woodland caribou, and bull trout, to name just some. They need wilderness to survive. They are symbols of American wilderness. They have a right to exist and live in their native habitats. Idaho is blessed with these endangered species in their roadless National Forest areas, and they need to be protected. They have a role in the native ecosystems that they live in. Without them, these environments are incomplete. I appreciate wolves for their positive function in the ecosystems, as well as just their simple presence. I once had a wolf visit my tent in Alaska and to this day it remains my favorite wildlife encounter. This incredible experience is now possible in Idaho for others. (Individual, Lynnwood, WA, #2362.13.41400.330)

Because of endangered species status and listing and recovery efforts in the State of Idaho, wolves have made a comeback and have repopulated much of their former range. But now, the State of Idaho wants to once again eradicate by far the majority of these "endangered-recovered" wolves to just a token population. In fact, the Governor of Idaho has publicly said that he would be the "first in line to shoot a wolf." This statement by the "leader" of Idaho reflects a sort of redneck, uneducated, mentality. In this way, he and President Bush show similarities. (Individual, Lynnwood, WA, #2362.14.41400.030)

I will confine my comments to the Idaho Panhandle National Forest, which is the area I am familiar with. I can assure you, having driven them, that there are sufficient roads in the Panhandle Forest now. In fact, if anything, there are too many for the welfare of some of the endangered and threatened species. The caribou, which are surviving by the narrowest of margins, need less, not more, human intrusion into their feeding grounds. Entry of more humans into the grizzlies' habitat increases the likelihood of encounters between the two and that often means dead grizzlies. Connective corridors for the lynx already are threatened by logging (some on private lands enclosed within the National Forest). Any rule that permits increased motorized activity would be damaging to these animals. In addition, more roads would lead to greater likelihood of spreading invasive weeds and of fire. (Individual, Beaverton, OR, #607.2.64100.300)

TO PROTECT TOPSOILS

Opening these [Idaho Roadless Areas] areas to resource extraction will erode fragile topsoils. (Individual, Lake Oswego, OR, #4541.5.70000.230)

Protection of Roadless Areas: Water and Aquatic Species Concerns

4-6 Public Concern: The Forest Service should protect Roadless Areas.

TO PRESERVE CLEAN WATER, FISH AND WILDLIFE HABITAT

Please do not weaken protections for Idaho's Roadless Areas. Don't use fire fighting as a weapon to add more roads to Roadless Areas. We must do all we can to protect our water resources from contamination and protect our remaining forests and the wildlife that depend on them. (Individual, #346.2.40000.2)

TO PRESERVE CLEAN WATER, FISH AND WILDLIFE HABITAT, AND RECREATION OPPORTUNITIES

This state is the 3rd fastest growing state in the country and it is crucial that we protect these lands from any development. They provide clean water, crucial fish and wildlife habitat and unmatched recreation opportunities. It should be our mission to protect not only our future but the future of generations to come. (Individual, #198.2.40000.2)

I am writing to request the protection of Idaho's remaining natural Roadless Areas as they are. These Roadless Areas are vital to healthy watersheds, fish and wildlife habitat, and wilderness recreation experiences in Idaho. My family belongs to the North Idaho Fly Casters and enjoys fly-fishing, and we value the healthy fisheries in this state. We do not want anything to harm the watersheds and degrade the streams and rivers here. (Individual, #183.1.40000.560)

The state of Idaho contains over 9.3 million acres of national forest Roadless Areas. This is the most of any state outside of Alaska. Idaho's roadless backcountry makes up the core of the last intact forest ecosystem in the lower 48 states the last place where all of the native plants, fish and wildlife can still be found. Weakening protections for these areas does not make sense. I write also to ask that you fully consider the detrimental impacts of logging, road construction, phosphate mining and other industrial development in Roadless Areas. Such activities will have irreversible impacts on the clean drinking water they supply, the vital habitat they provide for fish and wildlife, and the countless recreational opportunities, including the best fishing and hunting that exist on these unspoiled wild areas in Idaho. It is important that these backcountry areas, all 9.3 million acres, in our national forests are protected. (Individual, #632.1.40000.2)

BECAUSE POLLUTION ALREADY HAS HAD A LARGE IMPACT ON WATER AND WILDLIFE

I would like to voice my opinion on Idaho's Roadless Areas. Please leave these Roadless Areas pristine. These areas are crucial for wildlife habitat and the quality of life "downstream." We already have enough heavy metal pollution in our area, allowing these areas to be roaded and mined/logged will only

cause more problems. There are few areas remaining that are wild. Let's keep as many as we can. (Individual, #184.1.40000.2)

TO PROTECT FISH SPECIES

I work as a Fishery Biologist for the Nez Perce Tribe. Every day of my work is spent in the backcountry of Idaho trying to bring back endangered Chinook salmon. The last stronghold of these fish is the excellent habitat that we are blessed with in Idaho. It is critical to these fish and numerous other animals that they have undisturbed habitat to continue to exist. It amazes me to think that Lewis and Clark were some of the first white people to pass through Idaho just two hundred years ago. What we have done to our forests and rivers in just two hundred years is disheartening. This is the last of our roadless areas, this is the last of the salmon who have been in these waters for hundreds of thousands of years, it is critical to keep out roads, phosphate mining and logging. I ask you to protect the last of these forests, for the fish, the animals and the spirit of the people that love this land. (Individual, #1092.1.40000.2)

TO PREVENT FLOODS

The Roadless Areas act as natural flood deterrents. In this time of unstable climate, it seems wise to preserve them in their natural state so we might avoid damaging flooding and the resultant pollution of our rivers. (Individual, #183.2.40000.240)

TO PROTECT WATER QUALITY

Please protect Idaho's wild native forests. They are more important than whatever is under them. Other once productive places have been destroyed by mining and logging, with toxic minerals poisoning surface and groundwater for the future in perpetuity. Keep our roadless forests roadless! (Individual, #549.5.40000.243)

Do not open any more Roadless Areas to industry in Idaho or anywhere in my National Forest. Water quality, and flow itself in many streams, is way more important than the bottom line for mining and timber companies. Send Bush to the bushes, but not mine. (Organization, #984.1.40000.240)

TO PRESERVE CLEAN DRINKING WATER

North Idaho is home to the mountain streams that provide water to the Spokane/Rathdrum Prairie Aquifer, an area critical for members of The Lands Council and Conservation Northwest living in eastern Washington and northern Idaho. Over 2,000 watersheds, supplying clean drinking water for over 60 million Americans, originate in Roadless Areas that are safeguarded by the 2001 Roadless Area Conservation Rule. Under these existing protections, The Lands Council and the Forest Service supported a project in the Myrtle Creek Watershed in northern Idaho last year, helping protect Bonner's Ferry's municipal watershed as well as the habitat for wildlife species such as grizzly bear. (Preservation/Conservation, Spokane, WA, #1799.8.20000.241)

TO PROTECT WATERSHEDS

We need intact forests for watershed health. (Individual, Bellingham, WA, #4461.2.40000.240)

Opening these [Idaho Roadless Areas] areas to resource extraction will degrade healthy watersheds. (Individual, Lake Oswego, OR, #4541.3.40000.240)

Protection of Roadless Areas: Fire and Forest Health Concerns

4-7 Public Concern: The Forest Service should protect Roadless Areas.

TO REDUCE FOREST FIRES

My family and our property barely survived the Cedar Creek fires four years ago, and now the Witch Creek fires last October. Down here in southern California trees exist in a fragile ecosystem because of nine years of drought and urban sprawl. I've seen firsthand that global warming is real, and that every piece of virgin land remaining must be protected. (Individual, #38.1.40000.260)

As longtime Idaho residents and nature enthusiasts, Rocky Mountain Blues is disgusted with your plans to open up critical Idaho Roadless lands to roadbuilding, logging, and mining. Natural fire regimes travel through Roadless Areas in a healthy manner, providing new substrate for future plants and animals. Removing roadless protections would only increase the risk of devastating wildland fire and the potential extension to human habitation. (Organization, #189.3.40000.260)

TO REDUCE THE INTENSITY OF FOREST FIRES

These are wild forests, and they should be kept so for the following reasons, among others:

Development doesn't make a former Roadless Area healthier, nor does it generally make fire less destructive. While fire is a part of the wild forest, it has also been found that wildfire usually burns hotter and more destructively in the roaded parts of the national forests than in the Roadless Areas. The above referenced assessment says that: "High road densities are correlated with areas that have relatively high risk of fire occurrence (from human-caused fires), high hazard ground fuels, and high tree mortality." (Individual, #1456.11.40000.260)

TO REDUCE THE RISK OF INSECT INFESTATION

Maintaining the roadless character of an area also reduces the risk of insect infestations and disease because roads increase the opportunity for invasive exotics to infiltrate healthy forests. In the Roadless Area Conservation Final EIS, the Agency found that Inventoried Roadless Areas are at a lower risk for insect and disease infestation than other areas on the National Forests. Id. at 3-119. (Organization, #1803.7.47000.266)

BECAUSE INDIVIDUALS SHOULD BE RESPONSIBLE FOR PROTECTING THEIR PROPERTY FROM FOREST FIRES

Living in the forest interface myself and having the county disaster inspection crew evaluate my place for wildfire, I have been told [that] by fireproofing the 100 feet from my house I will survive a crown fire. The experts have spoken on this subject, dispelling the notion that building roads and cutting timber are necessary to prevent fire from taking my house. (Individual, Kooskia, ID, #8016.4.43100.263)

Protection of Roadless Areas: Recreation Concerns

4-8 Public Concern: The Forest Service should protect Roadless Areas.

FROM MOTORIZED RECREATION

The reasons for protecting what remains are fairly obvious but they are: I pray that sooner, rather than later, we will wake up and realize that motorized recreation violates everything we are learning about our planet's health. Daily we learn the effects of our dependence upon motors on our air, water, and climate. Is there one good reason why we should add to what pollution is created by the necessity of our reliance on motors with more pollution in the name of "recreation"? (Individual, #844.5.40000.520)

TO PROTECT FISH AND GAME SPECIES

The majority of Idaho's Chinook salmon and bull, cutthroat, and steelhead trout habitat is in Roadless Areas, as is the majority of the most productive mule deer, elk, bear, bighorn sheep, and mountain goat habitat. Moreover, because they provide security during critical times in these animals' life cycles, Roadless Areas are main spawning/breeding grounds for the fish and game that supply the adjacent roaded areas. (Non-motorized/Non-mechanized Recreation, #1804.7.41000.560)

By the time I was four, my father had introduced me to fly fishing and hunting in the Blackfoot River drainage and Saw River drainage. Those river's headwaters come out of a lot of the Roadless Areas that we're talking about.

The public lands in and around those Roadless Areas produce blue ribbon cutthroat trout fishing and world-class mule deer hunting and elk hunting. Roadless protection is critical to perpetuating the quality of these resources. To carry on my family's tradition, I introduced my children to southeast Idaho's

Roadless Areas at a very early age. Although they're off at college right now, I'll begin getting phone calls very soon planning summer expeditions into those same Roadless Areas. (Individual, Pocatello, ID, #9149.1.40000.560)

**TO PRESERVE THE QUIET AND NON-POLLUTED NATURE
OF THESE AREAS FOR RECREATION**

Please accept this email as my support of Roadless Areas. I prefer hiking and mountain biking in areas without the noise and exhaust smells of motorized vehicles. I'm sure the environment appreciates it as well. (Individual, #281.1.20000.540)

TO PRESERVE BACKCOUNTRY AREAS FOR RECREATION

One reason I moved to Idaho is the backcountry areas. The 9.3 million acres of roadless land in our National Forest—its wild rivers, wildland, great fishing and great hunting—are what gives this state its special values. Idaho's wild backcountry is a natural treasure for all Americans—especially for those of us who live here and love to fish and hunt. We have a strong connection for our rugged, beautiful backcountry and we don't want it trashed. (Individual, #121.2.40000.870)

As a backcountry user for play and for work, I encourage protection of Idaho's remaining Roadless Areas. As Idaho's wilderness continues to be whittled away by corporate interests, I urge you to consider the many other users for whom intact, protected Roadless Areas are a primary reason for living in Idaho, as well as a primary draw for visiting from other places. (Individual, #125.1.40000.870)

**TO PROVIDE ROADLESS RECREATIONAL OPPORTUNITIES
CLOSER TO POPULATION CENTERS**

The benefits of preserving Roadless Areas near Idaho's cities and population centers should be considered. For much of the state's population, access to the Wilderness Areas (NWPS) requires long drives, where expense and time constraints often make them impractical destination choices. The Boise area (with 1/3 of the state's residents) is 3–6 hours (by road) from most of the trailheads in the Frank Church or other Wilderness Areas. Several IRAs [Inventoried Roadless Areas] in the Boise, Sawtooth, and Payette NFs [National Forests] fill the need for more accessible roadless recreation. Similarly, for the population centers in north Idaho, IRAs in the Clearwater and northern portion of the Nez Perce NFs provide popular roadless destinations that are closer than the Selway-Bitterroot (or other Wilderness Areas). (Individual, #1695.17.63000.500)

**TO PRESERVE THE NATIONALLY AND INTERNATIONALLY
RECOGNIZED RECREATION VALUES**

Roadless Areas provide recreation value of national and international renown. The beauty and wildness of these lands lure hikers, campers, backpackers, river runners, mountain bikers, and climbers by the thousands. These lands are a western mecca for hunters and fishers who find in Roadless Areas the majority of the highest quality mule deer, elk, bear, bighorn sheep, and mountain goat hunting units as well as the headwaters for many of the state's blue ribbon trout streams. Roadless Areas afford some of the longest big game hunting seasons in the state at a time when increasing limitations are the norm, and the astonishing diversity and abundance of wildlife species in Roadless Areas are a gold mine for nature viewers and wildlife photographers. This translates into long-term economic benefits for communities serving the needs of recreationists enjoying these areas, benefits that grow as population increases and pristine Roadless Areas become more sought after for both recreation and solitude. (Non-motorized/Non-mechanized Recreation, #1804.11.40000.860)

4-9 Public Concern: The Forest Service should provide permanent protections for Roadless Areas.

This plan is a serious threat to Idaho's Roadless Wildlife Habitat. A better alternative, and one not even considered by this DEIS, is the permanent protection of these important wildlife habitat areas. In Idaho, we are proud of our natural resource legacy. Help us protect it for future generations. Trading pristine Roadless Areas for new mining and superfund cleanup sites is not in the best interest of the people of the

state of Idaho, present or future. Please do not ruin our Roadless Wildlife Habitat Areas with this short-sighted plan. (Individual, #14.6.33100.200)

TO PRESERVE SPECIES DIVERSITY AND CLEAN AIR AND WATER, AND TO IMPROVE THE QUALITY OF LIFE BY PROVIDING QUIET REFUGES FROM EVERYDAY LIFE

Please permanently protect all 9.3 million acres of roadless national forest lands in Idaho from roading, logging, grazing, mining and motorized vehicles in order to protect fish, wildlife, diversity, quality of life, solitude, natural sounds, clear air and water. (Individual, #89.1.40000.2)

BECAUSE STATE- AND PRIVATELY OWNED LANDS ARE NOT TYPICALLY MANAGED AS WILDLANDS

Boundary County has a lot of State-managed and private forest lands. Those managers do not have to pay attention to all the rules the Federal government has to abide by. It is unlikely and rare that there would be a large tract of land in either State or privately managed land that remains “un-managed.” That increases the importance of the roadless lands on Federally managed ground. The wildlands of the county are the very lands that support the variety of animal species we have here, as well as the “quality of life” move exhibited in the last few years’ population growth. (Individual, Marquette, MI, #8022.3.40000.002)

4-10 Public Concern: The Forest Service should protect Roadless Wildlife Habitat Areas.

FOR FISH, WILDLIFE, RECREATION, CLEAN WATER, AND FUTURE GENERATIONS.

Roadless Wildlife Habitat Areas should be protected for fish and wildlife, and for future generations. They are important for quality recreation and clean water as well. Clean water especially is fast becoming the central issue of this century. (Individual, #4.2.40000.2)

4-11 Public Concern: The Forest Service should manage Roadless Areas on a regional scale.

TO PROVIDE UNFRAGMENTED HABITAT AND OFFSET CO₂ EMISSIONS

What the Idaho plan should do (and is solely lacking) is [make] landscape/forest management decisions [based] on the contiguous connectivity of the inventoried roadless habitat to already designated wilderness and National Park lands. This would provide a regional (Greater Columbia Basin) and continental scale series of contiguous adjoined Roadless Area corridors, consequently forming a protection unmatched in the lower 48, affording a catalyst affect and potentially providing a broad range of species long-term viability through watershed health, genetic connectivity, and for America and the planet a “carbon sink.” In my humble opinion these connected forest habitats (see examples below) would potentially have immense positive effects on the flora and fauna, but also act to offset the increased CO₂ emissions of a growing Idaho and country. For Example: Categorize the IRAs [Inventoried Roadless Areas] Breadwinner, Grand Mountain., Steel Mountain, Lost Man Creek, Sheep Creek, Smokey Mountains and Blue Bunch all with the same category of fully protected roadless. This would in effect contiguously connect all of the above to the Sawtooth Wilderness and the Frank Church Wilderness. Herein lies one of many looming conundrums for the future of our country’s natural heritage. The Idaho forest plan completely disregards any potential for working towards a regional and continental roadless system, connected by ecological criteria. (Individual, #1460.8.41700.2)

TO ADDRESS ISSUES THAT CROSS OVER STATE BOUNDARIES

Roadless Areas provide many unique values and those values do not stop and start at State lines. By limiting the analysis to one State and by considering only road construction and logging activities, the Forest Service is severely limiting the scope of the proposal and limiting options that are important from a national perspective. For example, our native anadromous fish stocks are in very poor shape with many species listed as threatened and endangered. Roadless Areas have been shown to provide the last stronghold for most of these species. Fish caught by fishermen along the coast of California, Washington and Oregon likely spent a great deal of their life in an Idaho Roadless Area. Does Idaho really have the

sole right to sacrifice this important treasure for short-term profits? Similar situations occur with many of our wildlife species—Idaho Roadless Areas provide important habitat links for wildlife populations in neighboring states such as Montana, Wyoming, Washington and Oregon. Wide-ranging species like grizzly bears, wolves, wolverines, fishers and lynx do not understand State boundaries, and have not really been given any consideration in Idaho’s plan. How can a roadless strategy limited to one State really address the large-scale issue of habitat connectivity for these kinds of species? (Individual, #1482.13.41700.300)

**BECAUSE LARGER AREAS PROVIDE ECOLOGICAL RESILIENCY
AND INCREASED BIODIVERSITY**

It is a well-established precept of conservation science that the size of an area and its proximity and connectivity to other conservation areas are important determinants of ecological resiliency and reliable predictors of biodiversity at all levels and long-term viability. The USFS’s insistence on managing Roadless Areas as discrete parcels separate from the surrounding landscape forfeits irretrievable opportunities for long-term ecological conservation. Few of the Roadless Areas in Idaho are individually large enough to contain and recover from large-scale landscape disturbances. Recognizing the importance of size and connectivity, the Tribe’s management recommendations recognize the forests of our homeland face an uncertain future. The combination of past management actions and a warming drying climate increases the risk of large-scale insect infestation, disease and wildfires. We do not believe the USFS has the resources to significantly reduce those risks through management actions. The Tribe’s recommendations create large connected natural areas that increase the ability of the landscape to recover from large disturbances and adapt to a changing climate. (Tribal Government/Elected Official/agency, Plummer, ID, #1696.12.41700.201)

TO DECREASE HABITAT FRAGMENTATION

Beyond their individual significance, Idaho’s Roadless Areas are cumulatively important. Along with Wilderness Areas, they form larger connected blocks of ecologically intact lands that make up the regional ecosystems. Many species require the larger habitat size provided by adjacent Roadless Areas, or by the wider regional ecosystem. These animal and plant species are negatively impacted by the habitat fragmentation caused by Roadless Area degradation. With so much of the petition’s focus at the IRA [Inventoried Roadless Area] and county level, this larger picture may sometimes be overlooked. (Individual, #1695.16.41700.190)

4-12 Public Concern: The Forest Service should ensure that Roadless Areas with habitat for Yellowstone cutthroat trout are protected.

BECAUSE THE SPECIES FACES MULTIPLE CHALLENGES

The Yellowstone cutthroat trout is a Region 4 Sensitive species and it was petitioned in recent years to be listed as a Threatened Species under the Federal Endangered Species Act. Although the U.S. Fish and Wildlife Service determined that Federal listing was not warranted, concerns for the species persist. These concerns include (1) habitat destruction by excessive livestock grazing in riparian areas, reduction in flow by irrigation diversions, entrainment into irrigation diversions, and road culverts that create fish passage barriers; (2) hybridization with introduced rainbow trout; and (3) competition with, and predation by, introduced brook and brown trout. Recently it has been determined that increasing numbers of avian predators, especially American white pelicans, are significantly reducing escapement of Yellowstone cutthroat spawners into the upper Blackfoot River and possibly into other waters such as McCoy Creek, tributary to Palisades Reservoir. Lake trout, which were illegally introduced into Yellowstone National Park’s Yellowstone Lake, have decreased that lake’s population of Yellowstone cutthroat trout. The South Fork of the Snake River, which until recent years had a large and stable population of genetically pure Yellowstone cutthroat, is now at risk from hybridization with rainbow trout. These new threats to these historically large and important segments of the range-wide distribution of Yellowstone cutthroat trout I believe elevate the importance of protecting smaller Yellowstone cutthroat populations, many of which exist in Roadless Areas within the Caribou and Targhee National Forests.

Roadless Areas that contain Yellowstone cutthroat trout should receive a high priority to maintain their roadless status in order to protect Yellowstone cutthroat trout from the habitat degradation that would come with increased roads. (Individual, #18142-.3.62000.356)

4-13 Public Concern: The Forest Service should limit timber harvesting and road construction.

BECAUSE MORE RIGOROUS MANAGEMENT WOULD INCREASE TIMBER HARVESTS

Risch himself said that more logs would be taken with his rule than with the Clinton rule. Have any of you driven around up in northern Idaho and looked at all the roads and unmanaged clear-cuts from decades ago? I have. I've driven on those existing roads and seen huge tracts of land with not much growing in them. It seems to me that we already have plenty of roads in this state—more than the Forest Service can keep up with. It also seems to me that there needs to be more rigorous forest management on Federal lands so that cut stands can produce more timber. We don't need more roads and new timber sales in Roadless Areas. (Individual, #1548.7.20000.261)

4-14 Public Concern: The Forest Service should protect endangered ecosystems, regardless of their importance to extractive industries.

BECAUSE SAGEBRUSH ECOSYSTEMS ARE IMPORTANT

I'm sorry if our governor had to leave. I wanted to point out that he dismissed a portion of these lands as being relatively unimportant simply because they were sagebrush, an ecosystem that doesn't produce as he referred to it as "stick one of timber." Part of my job is to be an educator, and I would like to help educate our governor that sagebrush ecosystems are among the most endangered in North America. Sagebrush tracts in Southeast Idaho are home to more than 300 species of vascular plants; they are critically important to many wildlife species. The sage grouse is one that we know has been considered for listing. And I would hope that our governor as well as anyone who's reviewing this rule would take into account the fact that sagebrush ecosystems are important as well as timber, even if they don't produce lumber. (Individual, #218.94.11200.300)

4-15 Public Concern: The Forest Service should put the protection of wildlife on an equal footing with the provision of trees and minerals to extractive industries.

I want to go back to the fact that we have an extremely unique mule deer herd down there, and it is a recreational opportunity for tens of thousands of Idahoans and others who, although the herd was damaged badly in the [19]90s with some severe drought combined with severe winters—and it's just slowly coming back. We also have a lot of elk in that country in that very Targhee-Caribou section, a lot of elk. And a lot of fish headwaters as well, especially with the Yellowstone cutthroat on the Snake River drainage side of that, which is tentatively considered listed for endangered species. And I guess what I was thinking about was whether or not within the Forest Service there can be a change in the priorities so that somehow wildlife attains equal footing at least with the trees and the mineral resources as an item, as a commodity so to speak—not so much for an industrial harvest but for the heritage and recreation of so many people, albeit it has to be on a controlled level because roads spell the end to big game herds. (Individual, #218.118.11200.560)

4-16 Public Concern: The Forest Service should consider designating Roadless Areas as wilderness areas.

TO PROTECT THEM FROM TIMBER HARVEST

Being a professional wildlife biologist, I am quite familiar with the arguments to harvest timber. We do not have to harvest every square foot of forest outside of wilderness areas. Mother Nature seemed to manage them well prior to us. Sounds like these Roadless Areas should have been designated wilderness areas. Perhaps your criteria for designating such are too restrictive. You need to review these criteria. Have they been through the NEPA process when you developed them? (Individual, #167.5.62200.261)

4-17 Public Concern: The Forest Service should actively manage Roadless Areas.

TO REDUCE FOREST FIRES

We who live in the rural West now have to put up with skyrocketing taxes and smoke for months as valuable timber goes up in smoke wilderness fires drag on all summer. Local senators try to dole out money from Washington to get reelected rather than address the true problem, [which is] no timber management. The National Forests don't need any more decommissioned roads and consequent Roadless Areas. We need the Forest Service to return to active management before the rural communities are gutted and the U.S.F.S. foresters have resigned in disgust. (Individual, #6.3.11100.890)

Let's not forget the need to access the forest to fight wild fires. I hope we have learned lessons from past forest fires that do destroy habitat for wildlife and also send plumes of pollutants including carbon dioxide, carbon monoxide, hydrocarbons, nitrogen oxide and particulate matter into the atmosphere. This makes the minor amount of pollutants emitted from OHVs [off-highway vehicles] very insignificant. (Individual, #261.3.64000.264)

TO REDUCE FOREST FIRES AND ATTENDANT GLOBAL WARMING

Most of the IRAs [Inventoried Roadless Areas] are not roadless but as long as this roadless process goes on these areas will not be managed. Allowing them to burn does nothing to improve the health of the forest, mercury emissions, CO₂ output. What part of temperature increases in the west comes from the millions of acres of burned timber? Does leaving burnt snags standing increase the temperature in the area? Snow melts off more quickly in areas with standing snags. Studies indicate that 25–30% of the mercury emissions in this country come from forest fires. The CO₂ given off by forest fires equals that given off by all the cars in our country. These IRAs are contributing to global warming and the pollution of our environment when they should be producing healthy forests and wildlife habitat. (Individual, #1825.17.43000.250)

BECAUSE IT IS A BETTER USE OF TAXPAYER FUNDS AND WOULD INCREASE ACCESS

As a former Forest Service Employee I am amazed at the total lack of actual on-the-ground management that the U.S. Forest Service has exhibited relating to our National Forests. The Forest Service seems to spend as much of the tax payers' dollars as possible on studying and managing office space, diversity, outsourcing, combining districts, combining forests, combining regions, combining agencies, etc. The American people are not stupid. They see your green, white, red and blue vehicles running up and down our roads and highways carrying biologists, geologists, GIS analysts, environmentalists, etc. The Forest Service even has its own Police Force! But no one available for "Forest Management"! I was a part of the cadre that actually helped to determine some of the Roadless Areas in Idaho. Today I am ashamed to have been a part of that decision-making process. The idea was to determine areas that should be roaded to better manage the resources and provide better access for the average National Forest visitors, not to take the millions of acres of National Forests designated and waste million of dollars doing everything possible not to manage the areas. Either the U.S. Forest Service needs to start managing the resources entrusted to it or turn the management of the forests over to State or local governments. (Individual, #118.1.11000.127)

BECAUSE MOST ROADLESS AREAS ARE NOT ACTUALLY ROADLESS

This process from the start has been a great example of "tell the big lie often enough and it will become the truth." These areas are not roadless. Most of the areas, after review by the Forest Service, have not been recommended for Wilderness consideration. In many cases, "only one concerned individual specifically suggested," a particular IRA [Inventoried Roadless Area] for Wilderness recommendations in response to the 2000 DEIS. We are not protecting these areas by limiting management options. Many of these areas have been neglected for years by the Forest Service. They need more, not less management, to bring them back to a healthy state. (Individual, #1825.1.43000.720)

TO SUPPORT THE MULE DEER POPULATION

The mule deer population has plummeted. And you'll say, Aha, it's selenium. Aha, it's poor forest management. These conifer forests that are not being properly managed by the Forest Service that is charged to do that are overrun by this mismanagement of habitat. We need to reestablish those absent stands by controlled burn and proper forest management. The Forest Service needs to be spending their time doing that and not fighting lawsuits by special interest groups. (Individual, Pocatello, ID, #9181.4.40000.023)

BECAUSE WE SHOULD BE USING OUR RESOURCES RATHER THAN THOSE OF OTHER COUNTRIES

We need to be good stewards and conservation minded, wisely using and managing those forests, not locking them away and using the resources of other countries who are not conservation minded at all. When forests are let go and "protected" from management, then the natural processes will do the management with fire, disease, and insects. (Individual, Eagle River, WI, #4695.2.40000.800)

4-18 Public Concern: The Forest Service should preserve historic cabins on Roadless Areas.

There are many historic cabins in these IRAs [Inventoried Roadless Areas]. The Forest Service should not continue to destroy these historic structures. Governor Wiley mined in the Warren Area prior to the existence of the Forest Service. His cabin was destroyed by the Forest Service. The area that is now managed by the Payette National Forest came under management of the Forest Service in 1905. Prior to that time it was homesteaded and mined very actively from 1862 on. Warren was the county seat for Idaho County and had a population of over 5,000 during the gold mining heyday. (Individual, #1825.16.62600.730)

Management of National Forest Lands

4-19 Public Concern: The Forest Service should protect forest lands.

TO PRESERVE BIODIVERSITY, CLEAN WATER AND AIR, AND SUSTAINABLE HABITAT

More recently the renowned biologist Edward O. Wilson wrote about the importance of conserving our world's habitat in his book *The Future of Life*. His message was more scientific and practical than [Wallace] Stegner's, and more ominous. You may have read the book; it is an objective and well-supported statement of the necessity of preserving this earth's wild places and its biodiversity for no reason less than the preservation of life on earth. He provided guidance to our politicians who might struggle with making the right decisions, fearful of interest group reaction or political ostracism. He writes, "The strength of each country's conservation ethic is measured by the wisdom and effectiveness of its legislation in protecting biological diversity." (Wilson at 185). Because of the abundant natural resources in Idaho, we have the opportunity to accomplish at least three of Wilson's "key elements" necessary to the future of life: (i) keep our frontier forests intact (as you know, Idaho has more natural forest land than any state other than Alaska); (ii) cease all logging in old-growth forests everywhere; (iii) concentrate everywhere on the protection of our natural lake and river systems. We need clean water, clean air and sustainable habitat. This is a scientific fact. Perhaps more importantly, as humans we also need the ability to touch, or just to stand and look into, nature, for its own sake. Idaho deserves wise and effective policies; it has much in its natural resource account to lose. (Individual, Hailey, ID, #161.8.40000.002)

4-20 Public Concern: The Forest Service should preserve wilderness lands.

BECAUSE THEY PROVIDE AREAS OF PEACE, QUIET, AND SPIRITUAL RENEWAL

I'm here today to emphasize how important the wilderness is to me personally. It's very soul-searching, soul-replenishing. While walking over the 14th Street Bridge, I thought about my short stay at King's Canyon National Park, which is not a wilderness but it's a national park—where [I was on] September 11, 12, and 13 of 2001. I not only had no cars, no backup beepers, but also no aircraft flying

over because they grounded all the airplanes. And that replenished my soul to the point that I can now face the 14th Street Bridge with great stoicism because I know there are still remaining places that I can go for refuge from all that.

What I'm asking you tonight [is] to please draw a line in the sand against this human overpowering of nature. And I'm also asking you as these dedicated people dedicated to preventing humanity from completely destroying our whole country, which certainly impressed me. (Individual, #218.99.40000.770)

4-21 Public Concern: The Forest Service should protect farms and forests.

TO PRESERVE FARMERS AND WILDLIFE

You are having a meeting on 1/14 and I believe it is time that all the farms and forests be left alone. We do not need any more condos or houses to overtake the property or oil wells. The animals need homes and the wildlife can keep our country clean with climate control. It is high time that this country leave our farms and forests in good care. I was helpful in seeing to it that we save our Everglades and I was even invited to the National Park. It is always my intention to see to it that the farmers have their farms and the forests have their trees and animals to survive. (Individual, #37.1.40000.2)

4-22 Public Concern: The Forest Service should resist the efforts of single-use organizations to limit management of National Forest lands for multiple use.

The Associated Press pushes their no use agenda daily in the paper till much of the public with little association with National Forests think the last tree is being cut and motorized vehicles are allowed to run anywhere. People like me who have spent their whole life working for or in the National Forests know better. The U.S.F.S. has done an excellent job of managing the various users until their hands have been tied by lawsuits from wealthy single-use-oriented organizations. The recent U.S.F.S. budget is a good example, it got \$40 million dollars to destroy (decommission) roads that cost millions to build and provide access for timber management recreation and fire protection. I can assure you this activity causes more erosion than it prevents. (Individual, #6.2.10420.800)

4-23 Public Concern: The Forest Service should follow a multiple-use management strategy.

BECAUSE IT IS INFEASIBLE TO PROHIBIT ALL EXTRACTIVE ACTIVITIES OR MANAGEMENT PRACTICES

My desire, as a citizen of this country, is to see National Forest lands managed, under the current multiple-use mandate, in a way that is consistent with preservation goals. Keeping in mind the effect that all mineral leasing, roadbuilding, and timber harvesting have upon the integrity of a forest's primeval, natural, ecological, and renewable characteristics, I do realize that to effectively "lock out" all interests or management practices that would affect these essential characteristics is wholly infeasible, both economically and as a matter of public safety (given the drought-susceptible West). (Individual, Norman, OK, #768.1.11000.002)

4-24 Public Concern: The Forest Service should maintain access to National Forests for all users.

Our National Forests are meant to be used and not locked up for "display only" purposes. Please maintain access for all users of our National Forests, like cyclists, motorcyclists, ATVs [all-terrain vehicles], hunters, prospectors, loggers and miners. Since all Americans use paper, wood, and minerals (iron, aluminum, copper, etc) on a daily basis, it is "greener" to use U.S. supplies of these minerals than to input them from afar. Therefore, it is imperative that this "Roadless Area Conservation Rule" be repealed at once. (Individual, Inglewood, CA, #2981.1.20000.800)

4-25 Public Concern: The Forest Service should actively manage National Forests.

TO PROTECT WILDLIFE AND TREES

Forest management problems that came up [in the public meeting] seemed one-sided. I would like to have heard from some of the forest rangers that were there. I am not in favor of just sitting back and letting nature take its course concerning forest fires. If we can prevent even one fire I think it's our duty to do everything we can to stop it. If that means cutting out dead trees, clearing fallen trees, or thinning, we should be actively doing do. If that means we have to make roads to get to the areas, so be it. That is a small price to pay to keep our forests safe. I heard some talk about roads displacing the animals, that it kills them. I've seen horrifying pictures of fires surrounding herds of animal that were trapped, encircled with fire and no way out. We watched as they burned to death wishing there was something we could do for those poor things. How about all the little creatures, birds, rodents, insects, reptiles we can't see as they get caught in the ugly monster. I've seen the burnt forest areas and I know they will come back in 40-50 years but I don't have another 50 years left in me. I'll be gone by then. In the meantime, we are having more fires each year feeding on good healthy trees. The trees to me are so magnificent. They are multitasking! They clean and purify the air. They are homes and nourishment to critters, lumber for our homes, fuel for our warmth, beautiful to look at and calming to touch. (No I'm not a tree hugger) and [have] many more wonderful jobs. Forest fires do just the opposite; it destroys everything in its path. I want to protect them. Prevent! Prevent! Prevent! (Individual, #289.5.42000.2)

BECAUSE NATURAL CYCLES CAN BE EXTREME

Our National Forests are more than just trees. The National Forests are made up of all the plants, animals, soils, rock, water, and various organisms in the soil and air, and those critters using the forest for a season only, or flying over in passage. We hire people who are trained and qualified to manage the lands and resources that compose our National Forests.

This roadless designation will make it difficult for man to have a positive impact on the forest. Either man or nature is going to manage our forest. Nature's style of managing living renewable resources goes from one extreme to another, and may take hundreds or thousands of years to complete. A stand of trees will go through various stages of succession, from seral (pioneer species) to climax species, but at some point fire, insects, disease, weather, or a combination of these will destroy the forest and the cycle will start over. The idea of Old Growth as a preservable moment in time is a myth. (Individual, #1434.2.62000.23)

TO REDUCE FOREST FIRES

The forest should have been thinned, with the objectives of creating diversity by reducing tree density, maintaining a species mix and size class, favoring for leaving the seral species while reducing the climax species, and following up with fire hazard reduction practices and controlled burning. If the forest had been managed in this way, most of the blackened areas would still be green. (Individual, #1434.5.42000.205)

4-26 Public Concern: The Forest Service should acknowledge that active management is not realistic.

BECAUSE FUNDING AND PERSONNEL SHORTAGES RESTRICT MANAGEMENT ACTIONS

The placing of so much Idaho National Forest land area into the Backcountry/Restoration management theme creates an absolute quandary for the Agency in its management efforts. While temporary road construction is rarely possible and timber cutting might be possible for special circumstances the document supports the almost impossibility to execute actions that deal with the allowed circumstances. This is supported in large part by reviewing what the Forest Service has actually accomplished on these National Forest lands in the 80 plus years of their assigned management. Even considering the 1940's to 1990's of really active management, of timber harvesting and roadbuilding, less than 20% of most National Forests in Idaho have actually had those practices applied. That is why such large parts of the Idaho National Forests still remain unroaded and un-harvested, altered only by increasingly more numerous and larger fires. On the Payette N.F. for example, a large Roadless Area had several areas of

wind -thrown spruce-fir timber from a wind shear even in the 1980's. There was an obvious need to harvest the wind-thrown trees before the spruce beetle, which was naturally active, could infest the highly susceptible wind throw and the population expand to epidemic levels in this largely spruce-fir forest area. Unfortunately, between the times needed to build access roads and deal with the endless litigations, the beetle population grew rapidly with more than 300,000 acres of that type affected on the northern portion of the Payette Forest. Near the end of the infestation, 1994, a wildfire started in the affected area; initial fire control was not effective, and about 150,000 acres burned until it was snowed out. Recent fires in the area have consumed more of the area. This will be the fate of most of the Roadless Areas under the management scenarios capable of being applied. (Individual, #760.10.23500.260)

Based on current personnel numbers and proficiency, plus a budget shortfall as your document point out, management actions are not achievable even under the most egregious of situations. Litigations and political maneuvers will assure nothing happens except insect outbreaks followed by wildfires. The beetle red and fire black program will be very much the order of the day for these lands. (Individual, #760.11.14000.260)

Biological Resources

4-27 Public Concern: The Forest Service should provide adequate protections for biological diversity.

INCLUDING PROTECTION OF SAGEBRUSH/ASPEN HABITAT

It is the inherent responsibility of the FS [Forest Service] to provide adequate protections for biological diversity in their management decisions. By requiring that an area have "adequate vegetative screening" the FS is placing a condition on high sagebrush/aspens or aspens/conifer types that cannot be directly met. The fact that some developments might be seen from some part of the Roadless Area does not reduce the importance of the Roadless Area or diminish the importance of the IRA [Inventoried Roadless Area] as habitat for species that have specific needs. The IRAs of southern Idaho would be diminished by the exclusion of this essential vegetative type and the Tribes [Shoshone-Bannock] will take all measures necessary to protect it. (Tribal Government/Elected Official/agency, Fort Hall, ID, #6546.75.41600.335)

4-28 Public Concern: The Forest Service should protect the sage-grouse and the sharp-tail grouse.

BECAUSE THEY ARE SIGNIFICANT TO THE SHOSHONE AND BANNOCK TRIBAL CULTURE

Sage grouse and sharp-tail grouse are found throughout the CTNF [Caribou-Targhee National Forest]; in particular they are found to thrive in IRAs [Inventoried Roadless Areas]. The reasons for this association between these upland birds and roadless features include, but are not limited to: the presence of botanical native species, minimal human interference, healthy watershed conditions (with the exception of the phosphate deposit region); and the presence of genetic diversity among leks. Sage grouse is significant in the Shoshone and Bannock cultures. The tangible significance of sage grouse is illustrated in Tribal subsistence, traditional dance and ceremonial songs. The Tribes have spiritual beliefs associated with sage grouse that are reflected in traditional dance and songs. Traditional dance imitates the dance that the sage grouse performs during the mating season. The dancer's regalia utilizes most parts of the sage grouse in the headdress, bustle and whistle. The sage grouse is also a traditional subsistence resource and is a part of the traditional diet of the Shoshone and Bannock peoples. On a broad cultural scale, the sage grouse is a part of the web of life and plays an important role in maintaining the balance of life. Specifically, the sage grouse's spiritual significance is recognized in the songs sung in traditional ceremonies, which speak of the power the sage grouse possesses. (Tribal Government/Elected Official/agency, Fort Hall, ID, #6546.91.41110.760)

4-29 Public Concern: The Forest Service should protect riparian areas.

BECAUSE THEY SUPPORT SUSTAINABLE ECOSYSTEMS

Healthy riparian areas must receive the highest protections because of the vegetative diversity, terrestrial and aquatic species use and water quality that support sustainable ecosystems within an IRA [Inventoried Roadless Area]. (Tribal Government/Elected Official/agency, Fort Hall, ID, #6546.51.41200.201)

4-30 Public Concern: The Forest Service should protect the Salmon and Clearwater Rivers.

TO PRESERVE CHINOOK SALMON AND STEELHEAD TROUT FISHERIES

Chinook salmon and steelhead trout fishing in the Salmon River and Clearwater River watersheds is very important to Idaho, Montana, and Washington sportsmen who fish these great rivers. It is important that we conserve the Roadless Areas that provide the spawning habitat and clean water to these anadromous fisheries. (Recreation/Conservation Organization, Missoula, MT, #1796.24.41120.560)

4-31 Public Concern: The Forest Service should protect the Snake and Salmon River watersheds.

TO PRESERVE THE WEST SLOPE CUTTHROAT TROUT

The problem of the Pacific salmon has again reared concern for that fishery. The Snake [and] the Salmon River watersheds must be protected. The “West Slope” cutthroat would be further impacted by any change in Wilderness designation. (Individual, Coeur D’Alene, ID, #8494.4.41120.650)

Forest Fire and Forest Health Considerations

4-32 Public Concern: The Forest Service should use science-based forest management techniques.

TO AVOID CATASTROPHIC FOREST HEALTH PROBLEMS

A major concern for this county [Adams County, Idaho] with the rule is the ability to deal with management of forest health issues utilizing effective science-based techniques. In particular, we [Adam’s County Board of Commissioners] believe the use of silvicultural tools such as thinning and timber harvest techniques is essential to avoid catastrophic health problems. The ability to utilize temporary roads, salvage harvest, thinning and other necessary treatments are an absolute necessity in the Backcountry/restoration and GFRG [General Forest, Rangeland, and Grassland management] themes. Removing roads and timber management capability limits all vegetation management activity to either wild-land fire or prescribed fire for more extensive management scenarios. (Government, #2364.4.43000.260)

4-33 Public Concern: The Forest Service should work to prevent forest fires.

BECAUSE OF THE ADVERSE EFFECT FIRES HAVE ON THE LOCAL TOURIST-BASED ECONOMIES

Fires also adversely affect the tourist-based economies of the communities closest to the forests. This past summer a soccer camp was to run in McCall. When people came to this area they immediately decided that they would not allow their children to participate because of the smoke from fires in the Payette National Forest. They knew it was unhealthy and left our area without spending what would have been spent during the week they were scheduled to be here. (Individual, #1825.87.43000.870)

TO PROTECT AIR QUALITY AND HUMAN HEALTH

EPA has recently lowered the standards for air quality in our nation’s cities for health reasons. The CO₂, mercury, lead, PM_{2.5} and other toxic compounds released by forest fires are impacting the health of the

people who live in Idaho. The people who live closest to the forests are the most impacted. I have friends who are asthma sufferers. Their health was adversely affected by the smoke from last year's fires through this winter. (Individual, #1825.85.43000.790)

TO PROTECT WILDLIFE POPULATIONS, INCLUDING SPECIAL-STATUS SPECIES, AND RURAL ECONOMIES

Large catastrophic fires, such as occurred in the Payette National Forest in 1994 and 2007, greatly influence the size and health of a number of wildlife populations as well as Threatened, Endangered and Sensitive and unique wildlife species. Management of vegetation while assuring adequate yearlong habitat makes it important not to eliminate roads and timber management practices that can assure stable populations of these wildlife. Catastrophic fire that follows forest health problems can dramatically influence populations in negative ways. This also has an adverse affect of the rural economies of the surrounding communities by reducing the number of hunters and visitors that come to view wildlife. (Individual, #1825.67.43000.340)

4-34 Public Concern: The Forest Service should avoid the use of prescribed burns.

BECAUSE THEY OFTEN GET OUT OF CONTROL

Prescribed fire: prescribed fire gets out of control many, many times causing millions of dollars of taxpayer dollars to be used to put out the "prescribed" forest fire. We had that big one in New Mexico burning hundreds of thousands of acres not that long ago. We had one on the Delaware River not that long ago that was "prescribed." They keep saying they are safe but they get out of control far too often and cost millions to stop. (Individual, #214.11.43100.800)

4-35 Public Concern: The Forest Service should facilitate the reduction of response times to deal with forest health issues.

BECAUSE RESPONSE DELAYS CAN EXACERBATE PROBLEMS

There must be a timely and effective response in the appropriate themes to deal with forest health initiatives. The commissioners of the involved county following notification of the local Forest Service officials should be capable of initiating a proposal to deal with a forest health issue in the various themes and the Forest Service Chief should respond in a timely fashion. The politics of situations should be set aside as much as possible and the science-based management initiated. The response should occur rapidly and be made as directly as possible. It may be appropriate to assign time frames to these responses. Agency time frames in dealing with or responding to health risks are often very slow and initiation of action even slower with all the mandated procedures and legal actions delaying the process even more. Forest health risks are sometimes hard to identify, making risk assessments difficult. Numerous instances can be cited that illustrate how minor problems quickly became major because of response delays. This usually results in catastrophic large fires being the major vegetation manipulation that occurs. The need for action needs to be clearer than currently written. Without some clarification judicial reviews will rewrite what the citizens of Idaho want done. (Government, #2364.6.23100.260)

4-36 Public Concern: The Forest Service should focus fire prevention on the Wildland-Urban Interface.

BECAUSE SUFFICIENT ROADS ALREADY EXIST

The reasons for protecting what remains are fairly obvious but they are: Fire prevention has been shown to be a matter of politics, not of science. The places where we need to be spending our limited fire prevention budgets are not in the Roadless Areas but in the wildland-urban interface where there are already plenty of roads. (Individual, #844.6.40000.263)

4-37 Public Concern: The Forest Service should reduce fuel loads on Roadless Areas.

To allow the IRAs [Inventoried Roadless Areas] to burn as prescribed by the existing plans without defueling them first is negligent. Neither the State nor timber companies would allow stands to burn without control if they were in the current condition of the IRAs. The fuel loads need to be reduced before they can be burned in a beneficial manner. The Forest Service and CCC [Civilian Conservation Corps] planted lodgepole pine in the Warren area in the 1930s. They replaced the Ponderosa pines that were the predominant species in the area. When the State plants in similar areas they plant Ponderosa pine, larch and Douglas-fir—species that are much more tolerant to periodic fires. (Individual, #1825.103.43000.262)

4-38 Public Concern: The Forest Service should consider impacts on special-status species habitat when deciding whether to allow wildfires in Roadless Areas.

The protection of critical habitat for threatened and endangered species should be considered when making decisions on whether or not to allow large uncontrolled wildfires in the Roadless Areas. A large portion of the Secesh River drainage was burned in 2007. This river provides critical habitat for the endangered Chinook salmon. Burning this large stretch of habitat will cause excess sedimentation, washing out of spawning areas, the destruction of shade along the river and spawning areas, potential blockage of sections of the river to fish passage. (Individual, #1825.102.43000.335)

4-39 Public Concern: The Forest Service should be conservative in the application of fuel treatments to prevent forest fires.

BECAUSE HIGH-DENSITY VEGETATION PROVIDES HABITAT AND TO SUPPORT NATURAL FIRE REGIMES

The Tribes [Shoshone-Bannock] recognize the need for natural fire regimes and request that fuel treatments, when there is an immediate threat to life or structures, within a Wildland/Urban Interface (WUI) be coupled with restraint. Reducing high-density vegetation, when a threat is merely imminent, may result in a loss of valuable habitat for Tribal subsistence resources. There should be no permanent roadbuilding associated with these activities. (Tribal Government/Elected Official/agency, Fort Hall, ID, #6546.81.43000.263)

4-40 Public Concern: The Forest Service should limit firefighting efforts.

BECAUSE NATURAL FIRE REGIMES BENEFIT WILDLIFE

I am worried that the current frenzy for putting out fires could hurt the elk hunting in the Needles [Roadless Area]. This spring the Department of Fish and Game had a spring count of the elk in hunting units 19A, 23, 24, and 25. They counted more elk in these units than ever before despite having the wolf reintroduced to our area. The reason for this was the fires that we had about ten years ago. It would be a shame that fire control would be used as an excuse to enter these areas for control of fires when the evidence for big game habitat restoration has been so positive with the fire. Most forest fire fighting is not only a waste of money but harmful. (Individual, #309.10.43000.560)

4-41 Public Concern: The Forest Service should not support road construction for wildfire prevention.

BECAUSE AREAS IN THE WILDLAND-URBAN INTERFACE ALREADY HAVE SUFFICIENT ROAD ACCESS

Fuels reduction programs near the Wildland Urban Interface can be accessed by existing roads to those urban areas. There is no reason to potentially threaten millions of Roadless acres with new roads for fuels reduction programs when only .03 percent of Roadless Areas are in the half-mile-wide Community Protection Zones, and current Roadless rules already provide solutions to protect property and life. (Individual, #1825.21.43000.263)

**BECAUSE PROPERTY OWNERS SHOULD BE RESPONSIBLE FOR THEIR OWN FIRE PROTECTION
AND ACCEPT THE RISKS OF LIVING IN FIRE-PRONE AREAS**

I do not believe that the Forest Service should allow the building of any roads in Roadless Areas (“Backcountry” or otherwise). The mitigation measures to provide fire protection should be done on the property that would be at risk. If the persons affected are not willing to implement those measures, and/or are not willing to accept the risk, then they should not locate in these areas, or they should relocate to another area. Higher public issues are at stake in protecting the Roadless Areas, values more important than protecting the short-sighted dreams of those who would put themselves at risk, and expect or demand that the Roadless Areas be degraded for their selfish interest. (Individual, #1553.3.64100.263)

4-42 Public Concern: The Forest Service should avoid protecting Ponderosa pine from forest fires.**BECAUSE THIS SPECIES IS NATURALLY RESILIENT AND BENEFITS FROM FOREST FIRES**

The Forest Service should allow these trees [Ponderosa pines] to occur in their natural condition and not try to put out fires that “threaten” them. Their thick bark renders the Ponderosa pines nearly fireproof and their wide spacing assures that most will not burn. In many places this forms the park-like stands that some are fond of showing in pictures. But where fires have burned in the Needles area the fire has strengthened the resilience of the Ponderosa pine forest. Owing to the sensitivity of the South Fork drainage, no firefighting should be proposed, except within one-half mile of year-round lived-in residences, such as in Yellowpine. Even here the logging should be “feathered,” rather than creating abrupt forest edges, to reduce the intensity of fires as they reach structures. (Organization, #1480.8.43110.2)

4-43 Public Concern: The Forest Service should acknowledge the important role wildfire plays in creating healthy ecosystems.

The Tribes [Shoshone-Bannock] object to the characterization of danger to forest health posed by wildfire. Idaho’s forests are sensitive and a wildfire can immediately impact an area. But many conifer types require a natural fire regime to regain the attributes associated with a healthy ecosystem. The Tribes recognize the vital role that fire plays in sustaining a healthy forest. (Tribal Government/Elected Official/agency, Fort Hall, ID, #6546.82.43000.205)

4-44 Public Concern: The Forest Service should consider road construction, mechanical treatments, and timber harvest in the Wildland-Urban Interface.

Road construction must be considered in 100 percent of the Wildland-Urban Interface [WUI]. Mechanical treatments must be considered in all of the WUI. Harvest should be used where possible in the WUI. (Individual, #1825.88.64100.263)

4-45 Public Concern: The Forest Service should permit timber harvest for forest health based on risk potential.**BECAUSE THE LENGTH OF THE PERMIT PROCESS EXACERBATES THE PROBLEMS
TREATMENT IS SUPPOSED TO ADDRESS**

It is extremely difficult to respond in a timely preventive fashion to natural ecosystem perturbations such as wind-throw, ice storms, hurricanes and other events that would allow rapid insect or disease to break out to epidemic levels. The NEPA process, appeals, litigation and actual conduct of road development on National Forest, plus the actual start-up to conduct timber operations, take 18 months to 2 years to begin the allowed treatment operations. This long period usually allows insects such as bark beetles with more than one generation per year to exceed the current timber industry capability to accomplish significant control that might slow the insect outbreak. The State’s forest industry has been so affected by mill closures, prices and product availability that only a limited capability exists. Often that capability is hampered by other operations, such as helicopter availability during fire season. For these reasons treatments must proceed based on risk rather than ongoing crisis. (Individual, #762.2.42000.2)

4-46 Public Concern: The Forest Service should not use forest health as an excuse for timber harvest.

I think perhaps the most telling example of the Forest Service's traditional attitude toward Roadless Areas is what happened during the salvage logging rider 1995 and 1996. This was a law passed by Congress that essentially suspended the normal environmental rules and regulations concerning management of National Forests so that the Agency could address forest health emergencies. Well, rather than address forest health emergencies such as the construction of old logging roads on unstable soils in the state of Idaho, the Agency took that opportunity to offer hundreds of timber sales, including many sales that had been previously ruled illegal by Federal courts.

Many of these timber sales, over 150, involved Roadless Areas. Many of these sales could only really be described as drainage busters because they involved extensive roadbuilding of arterial roads into pristine wildlands with the clear intention of opening these areas up and doing large numbers of timber sales in the future.

So I think it's critically important that we change this course and end this policy. (Individual, #218.102.10440.260)

4-47 Public Concern: The Forest Service should not support timber harvest for fuel reduction.

BECAUSE TIMBER HARVEST ONLY INCREASES FIRE RISKS

Logging for fire hazard reduction is one big risk that is simply not justified by the available science. Roadless Areas typically contain forest with large old trees that are far more resilient to fire than logged stands. Typical fuel reduction treatments will open up the stands, making them hotter, drier, [and] windier; thinning will increase fine fuels; and logging will stimulate the growth of future ladder fuels. Increased road construction and road use will increase fire ignition risks. The benefits of logging to achieve fuel reduction are speculative while the risks are concrete and unavoidable. (Organization, #582.10.43100.261)

4-48 Public Concern: The Forest Service should avoid leaving brush piles or burning them following thinning activities.

TO AVOID FIRE HAZARDS AND IMPACTS ON HUMAN HEALTH

Leaving brush piles behind for year is a bad practice. Brush piles were left for several years following thinning in the Secesh area. Those dry brush piles increased the danger to private property and people during the 2007 Loon Fire. Pole sales can greatly decrease the amount of material that needs to be burned following thinning. It is better to remove the material than to burn it. Burning the brush piles is bad for the health of the private property owners in the area. People with asthma cannot use their property while the piles are being burned. Burning contributes to air pollution and releases mercury. How will areas that are adjacent to Roadless Areas be protected from wildland fires? Smoke generated in the Roadless Areas should be considered. There are several areas in Idaho that are close to non-attainment of air quality guidelines. (Individual, #1825.89.43100.250)

4-49 Public Concern: The Forest Service should actively manage beetle infestation.

TO ADDRESS PUBLIC CONCERN ABOUT RESULTING TREE MORTALITY

During the public meetings we [Lemhi County Board of Commissioners] held in Lemhi County, and in the written comments we received, strong feelings emerged that reflected local public opinion. A great many of our citizens are well aware of the epizootic infestations of parasitic beetles that are causing widespread tree mortality in our forests. Common comments addressed a lack of management leading to large numbers of dead trees and poor forest health. (Government, #584.5.10430.266)

Road Construction Considerations

4-50 Public Concern: The Forest Service should support temporary road construction.

TO ADDRESS DROUGHT, FIRE, AND INSECT INFESTATIONS

Temporary stewardship roads to meet these objectives [drought, fire and insect resistant forests] are a good thing for the forest, for our rural communities, and for the state of Idaho. (Organization, #1813.9.64300.2)

4-51 Public Concern: The Forest Service should not support road construction.

BECAUSE ROADS FRAGMENT HABITATS AND SPECIES POPULATIONS, ACCELERATE EROSION RATES, AND PROMOTE INVASIVE PLANT SPECIES

New findings show road effects are far more pervasive than originally believed. Roads fragment habitats and populations, accelerate rates of erosion, and promote invasive exotic plants along roadways. Roads and habitat destruction form a positive feedback loop. Once in place, roads lead to habitat-destroying activities which, when exhausted, require new roads to reach even more remote areas to conduct the same activity. Unfortunately, these feedback loops are unstable and eventually must collapse. (Individual, #218.13.64100.330)

BECAUSE ROADS DIMINISH THE BACKCOUNTRY RECREATIONAL VALUES, ECOLOGICAL INTEGRITY, AND ROADLESS QUALITIES OF ROADLESS AREAS

Outdoor Alliance feels that no roadbuilding should be allowed in Roadless Areas for the purpose of "forest health." Roadbuilding in Roadless Areas diminishes their value as backcountry recreational destinations, impacts their ecological integrity, and generally impacts their roadless qualities. (Organization, #1821.23.64100.200)

BECAUSE THE AGENCY ALREADY HAS A MAINTENANCE BACKLOG

Idaho's forests have an estimated \$660 million backlog of needed maintenance on over 34,000 miles of existing road. Idaho should take care of this existing backlog before building new roads through our pristine wildlife habitat. (Individual, #14.2.64100.800)

BECAUSE THE AGENCY DOES NOT HAVE THE FUNDS TO POLICE UNAUTHORIZED USE OR MAINTAIN THE EXISTING ROADS

We know that the Forest Service does not have adequate budgets for patrolling unauthorized motorized use or to maintain the national \$10 billion backlog for needed road maintenance within the Forest Service network of roads. (Organization, #1492.7.14100.2)

BECAUSE ROADS ACT AS VECTORS FOR INVASIVE SPECIES

What I would love to impress upon you [are] the changes that roads can add to the fragile islands that intact, undisturbed interior forests truly are. Roads act basically as [vectors] to bring in invasive species that are often far more equipped than the resident ones to act aggressively, to make do with less. And as the species basically migrate in along those roads, particularly as outside, [sic] you will start to lose changes in that richness, that biodiversity that makes up the mosaic of these forests that Idaho is known for, that all these people feel so personally tied to, that I was lucky to glimpse, and also that the State is deriving so much money from ecotourism with. (Individual, Arlington, VA - #9128.1.64000.310)

4-52 Public Concern: The Forest Service should not allow construction of temporary roads.

BECAUSE ROADS ARE NOT TEMPORARY OR ECOLOGICALLY BENIGN

Temporary roads are not temporary or ecologically benign. In general, because temporary roads damage roadless characteristics, no exception to allow temporary roads in Roadless Areas for any reason should

be permitted, regardless of how the term “temporary road” is defined. (Organization, #1649.107.64300.800)

BECAUSE ROADS WILL EXACERBATE UNCONTROLLED RECREATIONAL ACCESS

The new roads (temporary or not) that will be created by the Idaho Roadless rule will only exacerbate the problem of uncontrolled recreational access in to our National Forest. (Individual, #1482.10.64000.530)

**BECAUSE TEMPORARY ROADS CAUSE THE SAME
ECOLOGICAL HARM AS PERMANENT ONES**

Temporary roads cause ecological harm. Temporary roads are potentially as ecologically harmful as permanent ones. For example, construction of temporary roads often involves the use of culverts for crossing watercourses, and cuts and fills for traversing steep slopes. In such cases, the temporary road is essentially permanent because it cannot be restored and, absent very expensive rehabilitation (e.g., to remove culverts, restore streambanks, and remove fills), any rehabilitative attempts will not come close to full restoration. Scientific research has found that temporary roads can have an enduring adverse impact on aquatic resources. [Footnote 1: Beschta, R.L., Rhodes, J.J., Kauffman, J.B., Gresswell, R.E., Minshall, G.W., Karr, J.R., Perry, D.A., Hauer, F.R., Frissell, C.A., 2004. “Postfire management on forested public lands of the Western USA.” *Conservation Biology*, 18: 957-967.] (Organization, #1824.4.64300.200)

The proposed Idaho Rule would allow harmful temporary roads. Ecological damage from road construction related to water hydrology, sedimentation in streams, wildlife fragmentation, fire ecology, landslides, and unmanaged motorized recreation is well documented. Road construction is not a benign action and was prohibited in all Roadless Areas by the 2001 Rule, with a set of seven specific exceptions applied nationwide. The 2001 Rule did not include any exemption from the prohibition on road construction for “temporary roads,” because these roads can be and often are permanent. In addition, due to a budget backlog, the U. S. Forest Service is unable to restore existing temporary roads. Any roads built in Roadless Areas, even if intended to be temporary, are likely to continue to exist. (Organization, #1824.5.20000.680)

4-53 Public Concern: The Forest Service should restrict truck traffic on National Forest roads.

BECAUSE THE TRUCKS USED FOR MINING AND LOGGING OPERATIONS CAUSE EROSION

When allowed, trucks used in phosphate mining and commercial logging are especially hard on the roads and should be largely eliminated. These roads are subject to considerable erosion and collapse thus degrading all of the forest, and streams, etc., near them. (Individual, #266.12.64100.200)

4-54 Public Concern: The Forest Service should limit the incursion of roads in the National Forests.

TO REDUCE THE SPREAD OF NONNATIVE, INVASIVE SPECIES

I ask you to maintain these protections both as an ecologist and an American. I spent several years studying the effects of invasive weed species on ecosystems in Montana and Idaho. In addition to the direct negative impacts on native species, increased roads and industrial uses of our national forests would mean increased levels of invasion by exotic species. This, in turn would cause greater negative impacts on native species and increased costs to the Federal government due to agency mandates to control noxious weeds. (Individual, #138.4.41200.2)

BECAUSE ROADS INCREASE HABITAT FRAGMENTATION

Fragmentation of lands by roads establishes boundaries among many species of wildlife. As the area where the wildlife feels safe to roam diminishes, it is unable to feed itself or reproduce. Just as humans establish invisible boundaries, it is the same for many species of wildlife. Minimum areas are required to maintain healthy populations and a balanced ecosystem. (Individual, #148.4.41700.330)

**BECAUSE SOMETIMES NEW ROADS ARE PROPOSED SIMPLY TO PREVENT FUTURE
WILDERNESS DESIGNATION**

New roads in Roadless Areas are sometimes proposed simply to prevent an area's consideration as a future "wilderness" designation—whether it gets logged, right away, or not. (Individual, #422.6.10440.680)

BECAUSE SUSTAINABLE FORESTRY CAN BE PRACTICED USING EXISTING ROADS

I support sustainable forestry using the vast network of existing roads in non-backcountry areas. (Individual, #207.4.43000.1)

BECAUSE ROADS ARE VECTORS FOR HUMAN-RELATED PROBLEMS

Roads bring a host of human-related problems into the few areas where there are none: wildlife poaching, invasive weed species, garbage-throwing yokels and vandals, many new human-caused/artificial sources of wildfire ignition, high-impact off-roading activities that increase erosion and siltation of clear streams, and the disturbance of solitude-requiring wildlife (such as nesting eagles, lynx, and wolverines) are among the most salient. (Individual, Yucca, AZ, #1580.3.64000.002)

4-55 Public Concern: The Forest Service should acknowledge that even when roads are temporary, the impacts of constructing them are not.

I was told at our roadless protection meeting that all roadbuilding under this new roadless protection plan would be temporary. After the timber harvest, the land would be available for wilderness. Using Squaw Creek as an example, I am being told after we remove the cedar for roads, and expose the stream to sunlight, changing the water temperature, we can rip up the road, put it to bed, and all will be as it was before the road was built. This is nonsense. I am against roadbuilding and timber harvest in the roadless national public land of Idaho. Nothing is the same after roads are built, and timber is harvested. The land is changed forever, just like the Squaw Creek drainage has been. Has Squaw Creek been put into wilderness after timber harvest? No. Are the trails still there that Bud Moore hiked? No. Is the Squaw Creek drainage still heavily roaded? Yes. Do I want to pay with my taxpayer dollars for more roads that change forever our wild Idaho National Forest land? No. (Recreation/Conservation Organization, #1816.13.70000.201)

4-56 Public Concern: The Forest Service should allow well-designed and administered roads in support of land management activities.

Many people are opposed to roadbuilding. Roads are necessary to implement land management activities. The physical road does not have to be wide and have large cuts and fills. The road should be minimum width with minimum cut and fill slopes but have proper grade and drainage structures. Roads can be kept a mile or more apart. The physical roads, if constructed and maintained properly, are often preferred by wildlife for travel corridors and forage. Most of the opposition to roads is due to what people do on the roads. Road use by man can be controlled both physically and administratively. (Individual, #1434.6.64000.23)

4-57 Public Concern: The Forest Service should close all roads in the Council Mountain Roadless Area.**TO HELP BRING BACK BOONE AND CROCKET MULE DEER**

There were many Boone and Crocket Mule deer taken on Council Mountain before all of those roads were built. Most of those roads around Council Mountain Roadless Area should be closed and the dirt bikes and ATVs [all-terrain vehicles] outlawed to bring those big deer back. (Individual, #309.2.64200.351.400)

Timber Harvesting Considerations

4-58 Public Concern: The Forest Service should encourage increased levels of timber production.

TO REDUCE THE IMPACT OF FOREST FIRES

Increased logging, if managed properly, could greatly reduce the devastation of forest fires, especially if followed by reforestation with beneficial native trees and plants. (Individual, #55.2.42000.260)

Look at the National Forest from the Montana border through Island Park and on into Central Idaho. There are thousands and thousands of dead trees from the beetle infestation. Lawsuits have kept these trees from being logged and there will be huge fires at some point in these areas. Why would you want to lock up more land from logging and increase the risk of devastating forest fires? Idaho is already in risk of losing large tracts of trees to fire. The fires will devastate the wildlife and put the wonderful rivers at risk for landslides. The fires will also impact hunting and fishing, which are very important to the economy of Idaho. We are supposed to manage the lands, not lock them up and let them burn. (Individual, #250.9.42000.2)

4-59 Public Concern: The Forest Service should not reduce the areas open to timber harvesting.

BECAUSE A REDUCTION WOULD EFFECTIVELY ELIMINATE TIMBER HARVEST AND WOULD NEGATIVELY AFFECT FOREST HEALTH

It [Idaho Roadless Initiative] will cut our logging areas to .01 percent (that's 1, 100th of 1 percent) and totally kill the logging industry and also make it to where we cannot even take care of these forest lands. These forest lands in question will, in fact, die. (Individual, #241.4.70300.260)

4-60 Public Concern: The Forest Service should discourage timber production in National Forests.

BECAUSE TIMBER HARVESTING WILL NOT REDUCE THE THREAT OF FIRE

Logging will not reduce the fire danger, as most of these lands are not near enough to towns to create a threat. (Individual, #1440.2.42000.740)

BECAUSE REPLANTING PRACTICES DO NOT STOP EROSION OR PROVIDE SUSTENANCE TO WILDLIFE, AND ARE MINIMALLY EFFECTIVE

Some years ago I helped to plant trees for Boise-Cascade after they had logged great swaths of land far off the beaten track in Idaho. Most people would never see the miles of burned and charred acreage that remained after they doused their logged areas with a napalm mix to add "nutrients" back into the soil. Planting the teeny saplings was a joke. There was nothing for wildlife to eat—but our little new plants that we carefully placed around enormous tree stumps. What giants must have stood there, and now they were gone. Runoff from the burned acres must have gone into streams and rivers. This has been going on for years and years and years. It is time to stop and take a look at what is still left. (Individual, #139.4.42000.201)

BECAUSE TIMBER HARVESTING EXACERBATES CLIMATE CHANGE

Global climate change is caused by putting too much CO₂ in the atmosphere and not adequately replenishing the oxygen. Chopping down forests (even if they are replaced after many years of re-growth) causes a serious blow to both sides of this mechanism! People will have to build their houses out of different materials (stone, brick, concrete block, etc.) Please stop this double-whammy against our planet and our future. (Individual, #101.4.42000.250)

BECAUSE TIMBER HARVESTING DISCOURAGES TOURISM

Idaho is my home state and where I usually spend my vacations visiting friends and relatives and engaging in activities such as river trips and packing into remote areas. I have invited these people to come to western Oregon and enjoy our highly roaded and logged national lands but so far they have all declined. Perhaps if some of these had been managed for [uses] other than timber, that would not be the case. (Individual, #163.4.42000.500)

**BECAUSE TIMBER SALES DO NOT COMPENSATE FOR THE FURTHER
LOSS OF OLD-GROWTH TREES**

The timber companies will get their hands on some more old growth, which has become scarce in areas now open, but the sales, as in the past, will likely be at a net loss or a gain inadequate to fund future maintenance. (Individual, #175.2.42000.860)

**BECAUSE INCREASED TIMBER HARVESTING IS AFFECTING THE
FREQUENCY AND MAGNITUDE OF FLOODS**

Our property is at the confluence of two creeks which come out of the Coast Range. We recently had a flood event larger than any we have experienced in the past 20 years; it is not a coincidence that this occurred in spite of the fact that the amount of rain was less than in several past events. These watersheds have been significantly impacted by increased logging due to shortened rotation periods on private industrial lands. As a matter of fact, Polk County had a higher harvest volume in 2004 than at any time in the past (Oregon's Timber Harvest 1849-2004; ODF), and it doesn't look to me that it has slowed this pace in the past 3 years. This flooding greatly altered the creek channels in a negative way. (Individual, #163.5.42000.230)

BECAUSE ROADLESS AREAS ARE UNIQUE AND MORE VALUABLE THAN TIMBER REVENUE

The biggest threat to wilderness is how rapidly we lose these areas, and how frequently these areas are under fire from the timber industry. The wildlands of Idaho and Colorado are globally unique, one of a kind. When they are gone, we will lose something much more valuable than the amount of revenue generated from timber sales. We will lose the last great wildlands of our country and part of our living history. It is the extinction of ecosystems out of shortsightedness. (Individual, #641.4.42000.2)

**BECAUSE OF MODERN TIMBER MANAGEMENT PRACTICES, HARVESTING
OF WILDLANDS IS NOT NEEDED**

An alternative to destroying our last remaining wilderness areas is reevaluation of the current management practices on the billions of acres active timberland for better efficiency. They are capable of producing the timber products we need without cutting wilderness areas. Many lands currently managed for timber are backlogged with harvests and surveys due to personnel shortages and dated management practices. If we use what we have much more efficiently, we can attain the same goals as harvesting wildlands without cutting wildlands. (Individual, #641.5.42000.830)

**BECAUSE OUR FORESTS SHOULD NOT BE HARVESTED
TO SUPPLY OTHER COUNTRIES WITH TIMBER**

What a shame to cut down our forests to provide lumber for other countries. Please do not allow this to happen. (Individual, #429.6.42000.830)

**BECAUSE ENOUGH TIMBER IN THE WESTERN UNITED STATES
HAS ALREADY BEEN HARVESTED**

I have seen what is left of the forest areas in the Washington/Oregon state area; so similar in ways to Carson National and Santa Fe National Forest in New Mexico. How sad is that? I would never want to see our New Mexico forest area be turned into the patchwork tree farm that has replaced the beauty that must have been in Washington and Oregon before man consumed it to consumerist advantage. (Individual, #157.5.42000.200)

BECAUSE TREES CREATE CONDITIONS FOR RAINFALL

We do not need to further defoliate our earth; global warming also stems from our defoliation of our planet. Rain comes from the condensation process that comes directly from trees. President Bush comes from Texas and he should realize that his state has been suffering from years of drought in some areas

there. There are not too many trees these days in Texas and, thus, not much rain to replenish our dried-up country. Wake up and save these National Forests because these forests are our actual lifeline that provide the rain, the water that we and all living creatures must have to survive....and for our future generations to survive! (Individual, #456.5.43000.250)

**BECAUSE LANDS MANAGED FOR TIMBER OFTEN CREATE HAZARDOUS
FIRE CONDITIONS AND INSECT INFESTATIONS**

Fire risk is often actually higher on lands managed by logging since this activity leaves slash accumulations and distributes fuels in unnatural concentrations. While logging slash accumulations can be treated, these activities are expensive and are often cost-prohibitive. Mechanical treatments can be difficult to impossible to accomplish on steep slopes, and the Idaho Roadless Areas contain some of the steepest lands in Idaho. Slash treatments in partial cut stands, which the DEIS proposes to increase, are particularly difficult to deal with and can pose threats to the residual stand. Logging can also cause bark damage that allows the entry of insects and disease, and slash accumulations that allow for the build-up of forest insects. New roads and skid trails allow increased levels of human activity, and that results in increased numbers of human-caused fires. Erosion, mass failures and soil compaction are also caused by logging, road construction and mechanical fuel-reduction operations. Logging removes snags and other important ecological components such as downed logs and is not a good substitute for natural wildfire and/or prescribed burning, which is already allowed under the "2001 Roadless Rule." (Individual, #1482.7.43000.261)

**BECAUSE IT IS HYPOCRITICAL TO ADVOCATE CONSERVATION IN
OTHER COUNTRIES AND NOT PURSUE IT HERE**

Forests are rather significant entities all around the world. How can we be advocating other countries be concerned about the destruction of forest there and turn around and not do our part. The United States of America is part of the world and it is important to do our share. (Individual, #443.5.43000.750)

4-61 Public Concern: The Forest Service should not permit commercial timber harvesting unless timber companies assist in forest cleanup.

My personal opinion would be to not let any commercial logging take place until each company completes some time cleaning up selected sections of forest that need attention. If they earn a living breaking down the health of Idaho's National Forests, then they should help clean it up. I think this could go as far as our recreationists to anyone using the forest to enjoy life should be required to take part in cleaning up a small portion. (Individual, #197.5.70300.260)

4-62 Public Concern: The Forest Service should support alternatives to timber harvesting, including tree farming and paper recycling.

We have to protect our forests. I find it unbelievable that with all of the other forested areas of the country and all of the tree farming efforts it is of critical importance that we open up Idaho forests to roads, which will eventually bring logging equipment. We have to find another solution. A paper recycle marketing campaign would provide more material to the industry than opening up these relatively small tracts of land for logging. (Individual, #1300.1.70300.200)

4-63 Public Concern: The Forest Service should require selective timber harvesting by helicopter in non-wilderness areas.

TO ACQUIRE HIGH-QUALITY WOOD WHILE AVOIDING SEVERE HABITAT DESTRUCTION

Require selective logging, in non-wilderness designated areas by helicopter, like Germany, for better quality wood without severe habitat destruction. (Individual, #386.5.42000.200)

4-64 Public Concern: The Forest Service should not construct roads for timber harvest.**BECAUSE THE AGENCY SHOULD NOT SUBSIDIZE TIMBER COMPANIES**

One other comment related to roads constructed in other areas of National Forests. Where roads are built for timber harvests, the American people should not be paying for them. Let the logging companies do so and let us still get a reasonable return for the timber harvested. We must not subsidize timber-harvesting companies. It should be illegal to do so. (Individual, #167.6.42000.830)

BECAUSE EXISTING ROADS CANNOT BE MAINTAINED

460,000 miles of logging roads are enough, and we already can't maintain the existing road system. Logging roads wash out with the rain, filling waterways with sediment and destroying fish habitat. (Individual, #220.2.64100.352)

BECAUSE WHAT LITTLE ROADLESS AREA REMAINS SHOULD BE SET ASIDE FOR WILDERNESS STUDY

The U.S. Forest Service should not construct any roads in Idaho's Roadless Areas. If work needs to be done in those areas, then draft animals to convey people and equipment should be used, that do not need roads. Under no circumstances should the FS construct roads for the purpose of logging. Very little roadless area exists in the lower 48 states, and what does exist should be set aside for wilderness study. Don't destroy what little acreage still exists as roadless. (Individual, #186.1.47000.650)

4-65 Public Concern: The Forest Service should not allow timber harvesting above Little Salmon River.**BECAUSE OF THE STEEP SLOPES**

The timber below Lockwood is on extreme, steep slopes above the Little Salmon River, an anadromous fish river. Any thought of logging here should be completely banished. (Individual, #309.17.42000.352)

Mining Considerations

4-66 Public Concern: The Forest Service should not permit mining in Idaho Roadless Areas.**BECAUSE MINING POLLUTES THE WATER AND NEGATIVELY AFFECTS WILDLIFE**

I would like to comment on the current encroachment into our Roadless Areas of Idaho and elsewhere by mining interests, in particular. These mining companies pollute our formerly clean water, killing the wildlife that drink from them and contaminating the flesh of the fish that live in them. (Individual, #1122.1.70400.240)

Mining pollutes and destroys the land, taking hundreds (if not thousands) of years for the land to return to a state where plants and animals can begin to grow. Mining also contaminates our precious water. Water is something our state and the West in general should hold dear. Current phosphate mining in our state is releasing selenium into our water and is already causing harm to our animals. Why would we allow more mining, when humans could be the next ones to perish from the toxic waters and soil? Why are the only people in favor of the rule change those working for fertilizer factories and others connected to the phosphate industry? (Individual, Pocatello, ID, #1463.6.44000.002)

UNTIL THE MINING ACT IS CHANGED TO PROTECT AMERICAN TAXPAYERS

The limitations on the mineral leasing and sale of common variety of minerals is a give-away program that started in 1872 and continues to this day. Until the 1872 Mining Act is changed to benefit the American people, mineral leasing and sale to industry should be stopped. The program presented is a loss to the Federal government and the taxpayers. (Individual, #308.13.44000.127)

4-67 Public Concern: The Forest Service should not permit golf course development as remediation of mining land.

BECAUSE WILDLIFE NEEDS LARGE UNDISTURBED HABITAT PARCELS

Golf courses as remediation of mining land may be touted in mining industry ads [advertisements]. But in wilderness areas needed by endangered species and others requiring large undisturbed habitat parcels, golf courses and the like create ever more fragmented wildlife habitat. (Individual, #1332.3.70400.520)

Phosphate Mining

4-68 Public Concern: The Forest Service should support phosphate production in Idaho.

TO SUPPORT AGRICULTURE AND FOOD PROCESSING IN THE STATE

Phosphate production in the state of Idaho is critically important to the agricultural economy of the entire region. Current Idaho production is adequate to supply all of the phosphate requirements for agricultural crops grown in the region. Without this production, the agricultural and food processing base in the region will be in serious jeopardy. Rising energy and input costs are already straining the agricultural economy to the breaking point. (Organization, #328.2.44210.800)

The Idaho Roadless Rule allows existing uses, such as phosphate mining in the Caribou National Forest, to continue and clarifies access to phosphate ore in Roadless Areas. It is in the strategic interest of our country to have forest management plans that allow for the best utilization of this important mineral resource: The Mineral Leasing Act of 1920 provided for the access to key minerals of national strategic value, such as phosphate. The existing Caribou National Forest Management plan provided that access was allowed to existing phosphate leases in Inventoried Roadless Areas. The mining of phosphate and the production of phosphate fertilizers have been a part of the community fabric in southeastern Idaho for approximately 100 years. Phosphate is a crucial nutrient necessary for the agricultural community to produce food and fiber. Phosphate from the Caribou National Forest is very important for providing agriculture in Idaho and the West with available and affordable supplies of phosphate fertilizers. Otherwise, phosphate fertilizers would have to be brought into the West, including relying on imported product to meet the needs of American agriculture. Congress recognized the importance of providing access to key strategic minerals, including phosphate, when it enacted the Mineral Leasing Act. Productive agriculture in Idaho and in the West is dependent upon having the necessary inputs to produce the food and agricultural products that our nation needs and uses. (Individual, #627.6.20000.423)

TO AVOID NEEDING TO IMPORT PHOSPHATE AND TO REMAIN ECONOMICALLY STRONG

I work in the Fertilizer industry. There are those who may say I work for an industry that only has its own best interest in mind and I'm only here to protect my job. Here is something else to consider. I'm a retired soldier. I spent some time in southeast Asia. In light of those facts, there are some things I'd like to see for our nation.

One of the things I'd like to see is for the U.S. to remain economically strong. Economic strength will allow us to have diplomatic and economic influence with respect to U.S. interest. This will allow us to avoid using our military power. Part of remaining economically healthy is the ability to feed ourselves and others.

Phosphate fertilizer helps us feed the world. There are few phosphate reserves in the U.S. One of our reserves is in southeast Idaho. In order to be an agriculturally sound country we need the fertilizer that ultimately comes from accessing some of our Inventoried Roadless Areas to get at phosphate reserves. I don't want us to depend on phosphate from Morocco or anywhere else. (Individual, Pocatello, ID, #621.2.44210.800)

**TO AVOID NEEDING TO IMPORT PHOSPHATE AND BECAUSE MINING COMPANIES
ARE BETTER STEWARDS OF THE ENVIRONMENT THAN THEY USED TO BE**

Idaho has the richest phosphate deposits in the world. Some of the Simplot workers I talked to told me the areas they now have access to will be depleted within the next 2–3 years. They already have leases for mining rights on the land we are talking about opening up. They just need access to get it. I would hate to have to import from other states or countries because a minority of people don't want a few roads. The Simplot Company has departments of people that deal with the environmental issues [and] I've talked with some of them. They are working hard to come up with the best plan possible for the land after harvesting at the mineral. They are now making the land more beautiful than they found it. I know it has not always been that way, but it is the policy now. They have families that live here too and don't want the land or environment destroyed any more than the next person. (Individual, #289.3.44210.800)

BECAUSE PHOSPHATE IS A STRATEGIC MINERAL

Access to phosphate deposits throughout the Caribou-Targhee National Forest (CTNF) in Idaho is critical for various reasons. Phosphate is a strategic mineral essential for agricultural production. In particular, phosphate fertilizers produced in southeastern Idaho are crucial for agriculture not only in Idaho, but throughout the western United States. If these phosphate fertilizer products are not available from Idaho producers, then they will come from imports. This will increase costs to the agricultural economy and create the opportunity for an essential crop nutrient to follow the path of oil; American agriculture will become dependent on foreign sources for fuel and fertilizer. (Individual, #1815.12.44210.800)

BECAUSE CONCERNS ABOUT SELENIUM CONTAMINATION ARE OVERBLOWN

Selenium was made out to be a horrific thing, a byproduct of mining killing and destroying the deer population at an alarming rate. I was shocked until I researched it closer. Selenium is a free radical eliminator and antioxidant, and is helpful in the proper functioning of the thyroid glands. There is some evidence that selenium can prevent or help fight a number of diseases, including AIDS. There is also evidence that selenium may help fight heart disease and rheumatoid arthritis. We are surrounded with this stuff all the time. The issue with the deer dying because of toxic amounts of selenium is a problem I know but it can be solved. I asked about this problem and learned steps have been made to resolve it but like all problems it takes time, money and manpower and Simplot is doing it. (Individual, #289.4.44210.790)

**4-69 Public Concern: The Forest Service should permit phosphate mining in the
Caribou-Targhee National Forest.****TO COMPLY WITH THE MINERAL LEASING ACT OF 1920**

Existing uses, such as phosphate mining and other mineral extraction, are allowed under the IRR [Idaho Roadless Rule]. The IRR clarifies access to phosphate ore in the Caribou-Targhee National Forest and other Roadless Areas. It is in the strategic interest of our country to allow forest management plans to continue to utilize phosphate and other important mineral resources. Please consider the following: Access to key minerals of national strategic value, such as phosphate, is allowed under the Mineral Leasing Act of 1920. The Mineral Leasing Act is Congress' recognition of the importance of access to key strategic minerals, including phosphate. (Agriculture Industry or Association, #1701.9.44210.130)

BECAUSE THE CURRENT FOREST PLAN PERMITS PHOSPHATE MINING

Existing uses, such as phosphate mining and other mineral extraction, are allowed under the IRR [Idaho Roadless Rule]. The IRR clarifies access to phosphate ore in the Caribou-Targhee National Forest and other Roadless Areas. It is in the strategic interest of our country to allow forest management plans to continue to utilize phosphate and other important mineral resources. Please consider the following: The current Caribou-Targhee National Forest Management Plan provides that access is allowed to existing phosphate leases in Inventoried Roadless Areas. (Agriculture Industry or Association, #1701.10.44210.160)

**BECAUSE THE PHOSPHATE FROM THE CARIBOU-TARGHEE
IS CRITICAL TO AGRICULTURAL PRODUCTION**

Existing uses, such as phosphate mining and other mineral extraction, are allowed under the IRR [Idaho Roadless Rule]. The IRR clarifies access to phosphate ore in the Caribou-Targhee National Forest and other Roadless Areas. It is in the strategic interest of our country to allow forest management plans to continue to utilize phosphate and other important mineral resources. Please consider the following: Phosphate fertilizer is a nutrient critical to agricultural production throughout the West. Phosphate from the Caribou-Targhee National Forest provides available and affordable supplies of phosphate fertilizer throughout the western United States. Without this phosphate supply, phosphate fertilizer would have to be imported into the western United States, either from other parts of our country or from foreign sources. (Agriculture Industry or Association, #1701.12.44210.800)

4-70 Public Concern: The Forest Service should not open Roadless Areas to phosphate mining.

**BECAUSE POLLUTION FROM PHOSPHATE MINING PLACES WATER,
FISH, AND HUMAN HEALTH AT RISK**

The DEIS proposes to turn several currently Roadless Areas into phosphate mines. The pollution from this activity will place our water quality, fisheries and human health at risk and the DEIS offers no real solutions to deal with this problem. In fact the Idaho mining industry has recently proposed that they be exempt from cleaning up the pollution that will result from their mining activities because it is too difficult and costly to clean up. Why would the Forest Service even consider such an option? (Individual, #1482.12.44210.2)

BECAUSE THERE ARE ALREADY 17 PHOSPHATE MINING SUPERFUND SITES IN IDAHO

As a result of phosphate mining activity, southeast Idaho is also home to seventeen (17) superfund sites with ten of these sites listed as follows: Enoch Valley, Rasmussen Ridge, Wooley Valley, Conda Mine, Dry Valley, North Maybe Canyon, South Maybe Canyon, Mountain Fuel, Champ, and Smokey Canyon. These superfund sites exist because the phosphatic shale that is mined contains trace elements such as uranium and selenium. Movement of water over mine tailings results in the leaching of selenium and other trace elements into the surrounding creeks and watersheds. At present, none of these superfund sites have been remediated. (Individual, #748.5.44210.201)

BECAUSE POLLUTION FROM PHOSPHATE MINING AFFECTS WATER, FISH, AND RECREATION

Caribou-Targhee National Forest: All of the Roadless Areas in southeast Idaho placed in the general forest category are being proposed for less restrictive management to allow mining corporations to mine phosphate. This will lead to selenium and other mining contamination, significantly affecting water quality fisheries and recreational opportunities. These Roadless Areas should not be open to mining, roadbuilding and logging. (Individual, #1703.28.23600.423)

4-71 Public Concern: The Forest Service should require the phosphate industry to prepare EISs and conduct public hearings prior to any future development on public lands.

The phosphate industry must be required to conduct application processes, environmental impact statements, and public hearings prior to any future development of our public lands, including expansion beyond their current mining site boundaries. (Individual, #954.2.44210.130)

4-72 Public Concern: The Forest Service should reconsider permitting phosphate mining in the areas designated as Backcountry/Restoration.

BECAUSE A LARGE PORTION OF THE CARIBOU-TARGHEE FOREST WOULD BE AFFECTED

With the Back Country Restoration categories, phosphate leasing [is a concern]. With roadbuilding, with that and the general forests, it opens up 78 percent of the Caribou portion of the Caribou-Targhee

National Forest. Please take a closer look at that, because that's a huge chunk of the forest. (Individual, #218.39.23100.800)

4-73 Public Concern: The Forest Service should encourage sustainable, phosphate-free farming methods.

BECAUSE PHOSPHATE MINING CAUSES POLLUTION

Rather than permitting, even promoting, the destruction of our lands, and the concurrent pollution it will cause, the Federal government should be considering ways to save our lands and decrease our impact upon them.

Phosphate mined from land in Idaho is largely used as agricultural fertilizer. I like to eat as well as the next person, but I believe that the government can encourage the development of farming methods that are more sustainable. Facilitating the use of foods grown without mined fertilizers would not only reduce the need to destroy our remaining lands, but would likely improve the fertility of farmlands, and encourage practices of growing food that will be consumed locally. (Individual, #1403.4.40000.800)

Oil and Gas Development

4-74 Public Concern: The Forest Service should not support oil and gas extraction on National Forests.

BECAUSE OF THE ENVIRONMENTAL EFFECTS

I know from both sides of the oil and gas industry, the destruction, both obvious and latent, that our future generations will have to face. Stephens Productions, a Stephens Group, took my beautiful hay meadow, where deer used to feed, under the old oak trees that used to be there, and turned it into an industrial waste dump, all within 100 yards of my front door, all without my consent. The only thing that I found that they were beholden to was a state fire marshal's code requiring them not to spud within 150 feet of my home. When you consider the typical drilling location, not counting the chemical pit, is 300 by 400 feet or larger, the location can come right to your doorsteps. I've had fat-bellied sheriff's deputies threaten to "cuff me, and stuff me" and a roughneck so drunk he couldn't stand shove a pistol into my gut and tell me that his pusher told him to shoot my ass. I would not like to see that kind of destruction there [in Idaho] that happened in my front yard. Be strong, there is very little wild America left. (Individual, #659.3.44100.700)

BECAUSE TAXPAYERS SHOULD NOT BE SUBSIDIZING THESE COMPANIES

The oil and gas industry should be developing private land and paying private landholders for the use of their land. This would lead to less pollution because these highflying oil and gas companies with their \$400 million retirement pensions have been using taxpayer-owned land and leaving it severely polluted. No private owner would let these hijackers get away with that. Taxpayers have been getting screwed by the oil and gas industry, which bribes congress not to change the 1860 mining law. (Individual, #214.9.70000.60)

Alternative Energy

4-75 Public Concern: The Forest Service should make alternative energy exploration and development a priority.

BECAUSE ALTERNATIVE ENERGY DEVELOPMENT IS INEVITABLE

The U.S. desire for further oil exploration and development at the risk of our remaining untouched forest land seems a fatuous move given the fact that alternative energy development is inevitable. Please make alternative energy exploration and development a priority. No more oil to drill and no more land from which to drill will be a ridiculous situation in which to find ourselves. (Individual, #332.6.70000.421)

4-76 Public Concern: The Forest Service should look to science and technology for alternative energy solutions.

TO AVOID FURTHER ENVIRONMENTAL DEVASTATION

Our energy crisis was built on decades of shortsighted policies by former administrations that have led to the addiction to oil and the current energy crisis we now face. It would be a much wiser and more competent solution to look towards science and technology for alternative and greener energy solutions. It is clear as day that we can no longer act as if we are immune to the environmental devastation our actions cause through misguided and short-sighted policies to fuel our insatiable demand for energy. Our government should be the leader in developing policies that take into consideration conversion of energy as well as green energy solutions. (Individual, #1101.2.70000.200)

4-77 Public Concern: The Forest Service should encourage development of geothermal energy.

TO BENEFIT POPULATIONS NEAR AREAS WITH GEOTHERMAL POTENTIAL

Geothermal development should be encouraged where feasible. Many of the sites with some potential are not near populations now and would not provide much, if any, benefit. Those areas that are near populations should be available for development. (Individual, #1825.100.44220.800)

4-78 Public Concern: The Forest Service should not encourage development of geothermal energy.

BECAUSE IT IS IRRESPONSIBLE TO OFFER TRIBAL AND PUBLIC RESOURCES FOR GEOTHERMAL DEVELOPMENT

It is irresponsible and unjust to offer the Tribe's [Shoshone-Bannock] and the public's resources to be sold to the highest bidder for geothermal energy development. (Tribal Government/Elected Official/agency, Fort Hall, ID, #6546.69.10440.424)

BECAUSE EXPLORATION AND DEVELOPMENT WOULD HAVE SIGNIFICANT IMPACTS

The Tribes [Shoshone-Bannock] oppose the permissive management in GFRG [General Forest, Rangeland, and Grassland] [management theme] IRAs [Inventoried Roadless Areas] for the geothermal development Rule [because]:

Exploration and development of geothermal power is destructive and detrimental to the environment in IRAs. It would require building new roads that would pose a threat to wildlife access and migration, increase sedimentation along watercourses and other associated impacts. It would require permanent construction of buildings and transmission lines that would pose a threat to the flora and fauna in the IRA. (Tribal Government/Elected Official/agency, Fort Hall, ID, #6546.63.44220.002)

BECAUSE DEVELOPMENT OF GEOTHERMAL POWER WOULD NEGATIVELY AFFECT WILDLIFE MIGRATION

The Tribes [Shoshone-Bannock] oppose the permissive management in GFRG [General Forest, Rangeland, and Grassland] [management theme] IRAs [Inventoried Roadless Areas] for the geothermal development Rule [because]:

Development of geothermal power would require a building and for security reasons it would require fencing and 24-hour surveillance, which is harmful to wildlife access, wildlife migration and movement, and would reduce the general public's access to trails and reduce scenic quality in the IRA. (Tribal Government/Elected Official/agency, Fort Hall, ID, #6546.65.44220.002)

BECAUSE DEVELOPMENT OF GEOTHERMAL POWER WOULD CONFLICT WITH TRIBAL RIGHTS

The Tribes [Shoshone-Bannock] oppose the permissive management in GFRG [General Forest, Rangeland, and Grassland] [management theme] IRAs [Inventoried Roadless Areas] for the geothermal development Rule [because]:

Development of geothermal power, within IRAs, would allow surface occupancy on lands that the Tribes have reserved hunting and gathering rights on, according to the 1868 Fort Bridger Treaty. The Tribes oppose any action that may impact Tribal rights to unoccupied lands within the National Forest system, especially IRAs. (Tribal Government/Elected Official/agency, Fort Hall, ID, #6546.66.44220.150)

BECAUSE THE TEST DRILL SITES HAVE NEGATIVE ENVIRONMENTAL IMPACTS

The Tribes [Shoshone-Bannock] oppose the permissive management in GFRG [General Forest, Rangeland, and Grassland] [management theme] IRAs [Inventoried Roadless Areas] for the geothermal development Rule [because]:

Exploration of geothermal potential in these areas would require multiple test drill sites, which have negative environmental impacts in the IRA. (Tribal Government/Elected Official/agency, Fort Hall, ID, #6546.64.44220.200)

Industrial Cleanup

4-79 Public Concern: The Forest Service should hold mining and other industries accountable for failures on environmental protection and cleanup.

BECAUSE SUCH INDUSTRIES HAVE A DISINCENTIVE TO ADMIT THEIR FAILURES DUE TO REGULATION'S EFFECT ON PROFITS

I do think water quality issues associated with mining have not been resolved and that the mines should somehow be held more accountable for their actions than in the past. Mining and other industries unfortunately have a disincentive to acknowledge their failures, which can cause environmental degradation, and also industries' profits can be severely hampered by environmental regulations. This fight between profits vs. western public land preservation will be fought as long as the U.S. exists. I think the key is to conserve National Forest Lands, not preserve them (except for unique wilderness areas). Yes, the U.S. should reduce its consumption of minerals and forest products, but in reality, current consumption patterns require that Americans use resources that the National Forest Lands possess. Makes more sense than importing rainforest timber or ore from South America. (Individual, #1078.2.11100.2)

At this point, one wonders why the regulatory agencies with jurisdictional authority (i.e., U.S. Environmental Protection Agency, the Idaho Department of Environmental Quality and other governmental agencies) haven't required the phosphate mining industry to completely remediate the existing mining sites, determine the actual costs of cleanup, and collect compensation from the owners of these phosphate mines before allowing additional NFS acreage to be accessed and mined. One also wonders if any lessons were learned by public officials from the ongoing costly (\$600+ million dollars [Footnote #11: GAO-01-431R EPA's Expenditures to Clean Up the Bunker Hill Superfund Site] [Footnote #12: Superfund and Mining Megasites: Lessons from the Coeur d'Alene www.nap.edu/catalog/11359.html - 37k]) superfund cleanup of the Silver Valley near Wallace, ID. If so, please listen and take action to serve the citizens of this country rather [than] the interests of industry by rejecting the repeal of the Roadless Area Conservation Rule. (Individual, #748.9.20000.423)

My wife and I grew up in Blackfoot, Idaho, and enjoyed the open spaces and clean air, except for the companies west of Pocatello, where the pollution from the Monsanto plant was so thick it killed the crops in the area. I don't know if the company paid off the farmers or not. It seemed to me that most of us just felt helpless to do anything against companies. In fact, I believe the first time I even heard this was not natural was when a person making a trip from the East stopped at the service station where I worked and said what the company was doing was criminal and wondered why the people in Idaho allowed the company to spew out such pollution. I have viewed Simplot's mines in southeastern Idaho and don't know that he even thought of the environment. I worked at his phosphate plant west of

Pocatello, which I understand was located outside the taxing authority of that city. So, most of the workers lived in Pocatello but the company they worked for paid less in taxes to a different entity. I think Simplot is a regular businessman; he is in there to operate at least cost and maximize his profit. Therefore, I doubt he will do any more than the minimum with respect to cleaning up the selenium produced by his mining. I recall Simplot used to brag that he dropped out of school in the eighth grade and got a head start on his peers; that was the secret of his success. I hope my government has him clean up his current mess before permitting him to proceed forward with other mining activities to create more messes. I am disappointed with the kind of people in this administration who don't share my values on the environment. I am against any changes in the roadless rule and feel as helpless now as I did in my youth in fighting businesses that make their profits by destroying the state's environment. One reason I voted for Obama in the primaries is that he is not taking money from businesses and others looking for ways to use the government to enhance their bottom line. (Individual, #1285.1-2.20000.2)

4-80 Public Concern: The Forest Service should require mining companies to clean up areas they have affected.

Mining on public lands in Idaho is wrong. [In] The past the mining companies have been dangerous to sheep and cattle (and possibly humans?). The mining companies should not be allowed to do more mining until they have reclaimed and cleaned prior sites. Promising to do so does not meet the standard. Why have they not cleaned up the sites already? Past performance gives an indication of future actions, and their past does not seem a reliable indication of good environmental practice. The mining companies have not acted in good faith in the past and should not be rewarded with more mining opportunities. (Individual, Silver Spring, MD, #766.2.44000.720)

**BECAUSE THEY SHOULD NOT BE GRANTED FURTHER ACCESS UNTIL
THEY HAVE PROVEN THEMSELVES GOOD STEWARDS**

Before companies should get any more use for private gain of what belongs to all of us, they need to prove with what they currently use that they will leave the land, air, and water as clean as they received it. They need to clean up what they've destroyed already. (Individual, #1277.3.11200.57)

I do not support the proposed Idaho Roadless Rule, for many reasons, among them the following: I learned from the NOW program [that] superfund sites from phosphate mining have not yet been cleaned up. The mining industry should completely clean up their existing sites before being allowed to mine in Roadless Areas. (Individual, #1332.1.20000.423)

4-81 Public Concern: The Forest Service should protect all Roadless Areas until mining companies have remediated areas already affected.

Leave the roadless wilderness alone, until mining companies have [really] reversed contamination at existing sites and demonstrated smaller-footprint/no-contamination proposed procedures. (Individual, #856.1.40000.400)

Grazing Considerations

4-82 Public Concern: The Forest Service should support grazing.

BECAUSE GRAZING IS A COST-EFFECTIVE METHOD TO REDUCE GRASS FIRE FUELS

It was good to see that some of the traditional local activities seem to remain intact. I would like to think that in the future experts will see that grazing will be one of the cost-effective and goal-effective alternatives to removing some of the grass fire fuels that accumulate over the spring and burn in the late summer and fall. With increasing Wildland-Urban Interface fire problems something more natural would be preferable to spending taxpayer money to take care of a problem that the livestock industry has paid to do in the past when they had grazing allotments. (Organization, #327.3.70100.263)

4-83 Public Concern: The Forest Service should eliminate rangeland.**BECAUSE GRAZING IS ENVIRONMENTALLY DESTRUCTIVE**

Ban all “rangeland.” Grazing is environmentally destructive, completely destructive. (Individual, #214.2.23600.810)

Recreation Considerations**4-84 Public Concern: The Forest Service should keep existing trails and roads open to multiple uses.**

Where there are roads and historically used motorcycle and ATV [all-terrain vehicle] trails, then those trails should remain open for multiple use. It is easy enough to designate some for ATV only, some for motorcycle only, some for hiking only, some for equestrian use only. See what and how the Cle-Elum RD [Ranger District] of the Okanogan National Forest has done it. It is a near perfect example of harmonious multiple use. It’s easy: Roadless remains roadless. Open remains open. That’s it. (Individual, #181.2.64000.530)

When developing management alternatives, the Agency must recognize the public’s desire to keep existing opportunities open. OHVs [off-highway vehicles] are by far the most desired and utilized means to obtain solitude in nature. Most public land visitors strongly favor maintaining existing roads and trails open to disperse use and address environmental concerns regardless of whether or not the road or trail is classified by the Agency. The Agency must recognize that providing for OHV use and protecting the environment means fully utilizing the inventory of existing roads and trails. The Planning Team should avoid overly restrictive management prescriptions that limit the land manager’s ability to respond to changing recreational patterns. (Motorized Recreation, Helena, MT, #168.89.50000.001)

4-85 Public Concern: The Forest Service should limit access to Roadless Areas to hikers.**TO LIMIT HUMAN INTERACTION WITH SENSITIVE WILDLIFE SPECIES**

I first became interested in the problem of mountain biking in 1994. I had been studying the impacts of the presence of humans on wildlife, and had come to the conclusion that there needs to be habitat that is entirely off-limits to humans, in order that wildlife that is sensitive to the presence of humans can survive (see Vandeman 2000) Vandeman, Michael J. (mjvande@pacbell.net), “Wildlife Need Habitat Off-Limits to Humans!” Presented at the Society for Conservation Biology meeting, University of Montana, Missoula, Montana, June 10, 2000, <http://home.pacbell.net/mjvande/india3.htm>.. But what is the best way to minimize the presence of people? Restricting human access is repugnant, and difficult and expensive to accomplish. It occurred to me that the best way to reduce the presence and impacts of humans is to restrict the technologies that they are allowed to utilize in nature: e.g., prohibit bicycles and other vehicles (and perhaps even domesticated animals, when used as vehicles). (Individual, #13.6.41100.500)

4-86 Public Concern: The Forest Service should preserve areas for non-motorized use.**TO PROTECT THEM FROM ROADS, NOISE, AND OFF-ROAD VEHICLE ABUSE**

I ask you to protect as much open space as possible as non-motorized or Wilderness areas. I enjoy hiking and fishing in areas away from roads, and roaded areas inevitably bring with them off road vehicle abuse and loud noise that lessens my enjoyment of the great outdoors. (Individual, #1425.1.40000.530)

4-87 Public Concern: The Forest Service should limit mountain biking.

TO REDUCE IMPACTS ON WILDLIFE AND OTHER TRAIL USERS

It is obvious that mountain biking is harmful to some wildlife and people. No one, even mountain bikers, tries to deny that. Bikes create V-shaped ruts in trails, throw dirt to the outside on turns, crush small plants and animals on and under the trail, facilitate increased levels of human access into wildlife habitat, and drive other trail users (many of whom are seeking the tranquility and primitiveness of natural surroundings) out of the parks. Because land managers were starting to ban bikes from trails, the mountain bikers decided to try to shift the battlefield to science, and try to convince people that mountain biking is no more harmful than hiking. But there are two problems with this approach: (1) it's not true, and (2) it's irrelevant. (Individual, Hayward, CA, #13.7.52100.002)

4-88 Public Concern: The Forest Service should restrict motorized use in Roadless Areas.

No vehicles off roads. Ever! Vehicles aren't toys. All should be licensed and stay on roads. Off-roading is the premier fragmenter. (Individual, Tucson, AZ, #2521.2.52200.331)

TO PRESERVE ROADLESS AREAS, ENSURE HUMAN SAFETY, AND REDUCE NOISE

I've hiked and camped up there since the '70s, and always thought how strange that almost every mountain is "candy-caned" with at least three roads. Only in the Frank Church and Salmo-Priest areas are the mountains free of this incessant roading. In the last four years, the Panhandle forests have gotten much busier, mostly with ATVs [all-terrain vehicles] and a bunch [of] pigs leaving huge piles of garbage in the undeveloped campsites. The ATV riders ride through the young woods, smashing the trees and bushes in their wake and leaving a trail of beer cans. I've seen teenagers on ATVs ride up the creeks and threaten fly fishermen who object to their "mudding," which ruins their fishing and the fishing holes.

I've seen big pickups spotlight deer in June and shoot at them from the road, not knowing I was camped almost in their line of fire. I've had a huge teenager threaten to shoot me for my camp site, claiming, "I'm from Kellogg, and we own the place...." Thoughtless people run generators night and day to watch satellite TV in their giant RVs [recreation vehicles] making it so I can't hear the trilling of the Swainson's thrush, the most beautiful sound ever...People uproot whole hillsides of huckleberry bushes filling up a huge truck to "pick later" in town. (Individual, #1196.1.47000.530)

4-89 Public Concern: The Forest Service should maintain and enforce rules preventing all-terrain vehicles from creating new cross-country trails.

TO REDUCE THE DAMAGE CAUSED BY THESE TRAILS

Rules preventing ATVs [all-terrain vehicles] from creating new cross country trails should be maintained and enforced. The damage done by a few has caused the many to be restricted. Education and enforcement are needed to reach a balanced use. Severe restrictions for ATV trail use should be avoided. (Individual, Idaho Falls, ID, #8802.3.12500.530)

4-90 Public Concern: The Forest Service should not restrict motorized access.

BECAUSE THE RESTRICTIONS WOULD NEGATIVELY IMPACT LOCAL BUSINESSES

Being an off-road vehicle mechanic I am able to support my family. With the land closing and minimal areas of ride-able land I would eventually be put out of work. I am not the only one in this position, as there are many towns built upon the winter and summer seasons that bring many ATV riders and snowmobilers through them. A few of the small towns that survive from the income of snowmobilers and other off-road vehicular users are Priest River, Kingston, Coolin, and Nordman. (Individual, #312.7.72000.530)

4-91 Public Concern: The Forest Service should revise the process for identifying motorized access trails and roads.

BECAUSE THE CURRENT PROCESS DISCRIMINATES AGAINST MOTORIZED USERS

We [Capital Trail Vehicle Association] are very concerned that motorized recreationists must identify and inventory specific routes that we want to remain open. These resources are there now and they are being used by the public and in almost all cases, it is [an] entirely reasonable type and level of use. Motorized recreationists should not have to identify and inventory motorized routes as part of the process. This is the work of the Agency. No other visitor group is saddled with this requirement. Our concern is that the Agency is using public involvement in a discriminatory way to establish which motorized routes will remain open. For example, the Forest Service has concluded that the level of use by motorcycles is low based on the level of public participation in the EA process. There is no actual data or comparison of motorcycle use to hiking use or direct discussion with motorized recreationists to substantiate this.

We respectfully maintain that the Agency cannot establish the motorized routes to remain open based solely on formal written public input because the process did not have a high enough level of participation by motorized recreationists to develop meaningful input. Therefore, the needs of motorized recreationists are not adequately or accurately represented. Our comments submitted during the EA further explain why this condition exists but basically the process, as practiced, is overwhelming and intimidating to the public. There are ways to more directly involve motorized recreationists, including interviews at club meetings and interviews on the trails and trailheads. Continuing to use the practice of formal written comments to establish the need for motorized routes will leave motorized recreationists with only a few main roads and with no high quality motorized trails. We object to this process and respectfully request that it be corrected.

Additionally, the current practice is discriminatory because non-motorized recreationists are not required to submit written formal comments that identify and defend each and every recreational opportunity that they want to enjoy in the future. Again, we respectfully ask that this practice be corrected. (Motorized Recreation, Helena, MT, #168.93-94.10430.530)

4-92 Public Concern: The Forest Service should consider motorcycles and mountain bikes compatible uses.

Motorcyclists have coexisted for years with other recreationists in the project area. There is no documentation of a widespread problem with this multiple use. We do not believe that it is reasonable to suddenly consider this multiple use a problem.

Mountain bikes and motorcycle use should be considered compatible uses. Both are mechanized and both prefer a single-track or narrow trail. Additionally, motorcyclists have been keeping single-track trails that mountain bikers have only recently discovered open for many years. (Motorized Recreation, Helena, MT, #168.104.51000.001)

4-93 Public Concern: The Forest Service should promote the development and use of quiet motorized vehicles.

TO AVOID ROAD CLOSURES BASED ON NOISE

It is not reasonable to enact motorized closures based on the issue of sound when viable alternatives could be pursued. The Sierra Club in their ORV Handbook makes the following statement "The fact is that most ORV [off-road vehicle] noise is unnecessary; even motorcycles can be muffled to relatively unobjectionable noise level." We [Capital Trail Vehicle Association] request that agencies initiate an education campaign (loud is not cool) to promote the development and use of quiet machines. OHV brochures such as those published by the Wallowa-Whitman National Forest include public awareness information on the importance of sound control. (Motorized Recreation, Helena, MT, #168.360.50000.530)

4-94 Public Concern: The Forest Service should create a Motorized Access and Recreation Mitigation Bank.

TO MITIGATE LOST MOTORIZED ACCESS OPPORTUNITIES

If the loss of motorized routes cannot be mitigated within the project area, then a Motorized Access and Recreation Mitigation Bank must be established. This mitigation bank would keep an overall accounting of the miles and acres of motorized access and recreational opportunities closed and the new motorized access and recreational opportunities created to offset that loss. It would be the responsibility of a cooperative group of public land management agencies to monitor the balance sheet and work towards no net loss/closure of motorized access and motorized recreation. Similar to other mitigation banks, motorized access and routes closed to motorized use would be replaced with equivalent routes on a one-to-one basis. Where equivalent routes cannot be found, then mitigation would be provided at 2 to 4 times the length of the closed route. Where equivalent access and/or areas cannot be found, then mitigation would be applied at 2 to 4 times the area closed, depending on the quality of the closed route or area. (Motorized Recreation, Helena, MT, #168.113.50000.530)

4-95 Public Concern: The Forest Service should support hunting in Idaho.

BECAUSE HUNTING CONTRIBUTES TO THE ECONOMY

[An] impact that happens is a loss of hunting opportunity [due to loss of deer herds]. Hunters and fishermen constitute over 30 percent of the population of Idaho, and big game license-holders or buyers, and I emphasize “buyers,” constitute about between 10 and 12 percent of the state of Idaho.

You say, who cares, they’re just a bunch of hunting idiots, and as soon as the urban Taliban in this country can take over we’ll eliminate those no-good hunters. The point is that the North American wildlife management model is based on, of course, the funding of the outdoor sports. They generate between \$1 billion and \$1.5 billion a year that hunters and fishermen pay willingly to go about their activities. And those monies are all handed back either through conservation agencies raising their own money like Rocky Mountain Elk or Safari Club or Turkey Foundation or TU [Trout Unlimited] or a whole bunch of other people, or through Federal excise taxes and license fees.

As we eliminate hunting opportunity, we eliminate that population of those financial supporters of the system. And if we are to continue that system—because I don’t think it’s going to compete with welfare and military and education and all the rest of the tax money that’s spread around. It’s a source of money. And if we eliminate opportunity, we’re going to eliminate recruitment of the next generation into these activities.

And that system will break down monetarily. So it’s a web that’s all connected, and more so than ever pointing to the Federal lands as the only place where these opportunities remain. (Individual, #218.121.41100.870)

4-96 Public Concern: The Forest Service should preserve all preestablished airstrips in Wilderness areas.

TO PROVIDE ACCESS

Please preserve all preestablished USFS airstrips in the Idaho wilderness area. They provide a low-impact, historically justified access to the Roadless Areas of Idaho. (Individual, Wenatchee, WA, #4941.2.61000.200)

4-97 Public Concern: The Forest Service should revoke all recreational user fees.

BECAUSE IT IS DOUBLE TAXATION

Please revoke all recreational user fees on Federal land; this is double taxation! (Individual, Salt Lake City, UT, #2409.4.50000.127)

Air Quality Considerations

4-98 Public Concern: The Forest Service should increase monitoring of air pollutants.

TO ASSESS THE HEALTH IMPACTS OF WILDFIRES

Mercury, PM_{2.5}, CO₂, CO, ozone NO_x, etc., are not monitored because those compounds are coming from fires. If you are going to continue to allow wildland use fires, you must increase monitoring in the communities inside and adjacent to these areas to determine the health impact on the people in these areas. (Individual, #1825.20.43000.790)

Social and Economic Considerations

4-99 Public Concern: The Forest Service should open more areas for logging and motorized recreation.

TO SUPPORT THE IDAHO ECONOMY

The Forest Service needs to open more areas for logging and motorized recreation. This will help the economy in Idaho and all states, bringing more people to our National Forest to recreate and enjoy the great outdoors. Money brought in by recreation and logging can be used to maintain our National Forest. If logging money went to the Forest Service instead of the General Fund, a higher level of maintenance could be performed. I don't believe the public enjoys spending tax dollars on wilderness land they will never see or use. Consider treating the National Forest like your home. You don't lock off a room in your house to save for the next person who may buy your home if you sell. You use all the rooms in your house. If a room in your house needs painting or new carpet because of use, you paint the walls or replace the carpet. The same thing can apply to our National Forest. (Individual, #325.2.51000.800)

4-100 Public Concern: The Forest Service should support employers that are not part of the extractive industries.

TO PROVIDE HIGH-PAYING JOBS WITHOUT DAMAGING THE ENVIRONMENT

To help employment in areas dependent on mines or logging or cattle, let us provide alternative jobs which do not damage and which do pay well. Do we need schools specializing in computer technology high in the mountains and connected with satellites? Do we need biologists and botanists and their staffs doing basic research, but with people from the area trained at government expense? (Individual, #1277.5.72000.800)

4-101 Public Concern: The Forest Service should not support extractive industries.

BECAUSE JOBS IN THE EXTRACTIVE INDUSTRIES ARE SHORT TERM AND RESULT IN LONG-TERM CONSEQUENCES FOR LOCAL COMMUNITIES

The businesses [the extractive industries] argue that they are good for the economy, providing jobs to the jobless. What they don't discuss is the fact that these are short-term jobs. There is no eternal source of lumber and minerals. But of course in the short term, the goal is fast money. Inevitably, these companies will move on, leaving the local economy depressed and the landscape pillaged. The money never seems to trickle down from the top, as the corporations would have you believe. And then there is the cost to the community once it becomes a haven for erosion, polluted water, and home to a giant open pit mine. Who will want to live there now? Who will vacation there? People come to Idaho for the scenery, for the opportunity to be a part of a wide-open space—an incredibly rare commodity these days. (Individual, #914.3.72000.800)

4-102 Public Concern: The Forest Service should not allow below-cost road construction.

BECAUSE IT IS FISCALLY IRRESPONSIBLE

Our government has a long history in the West of facilitating corporate profits at the expense of the taxpayer. Presently, Idaho's forests have an estimated \$660 million backlog of needed maintenance on over 34,000 miles of road. Allowing additional below-cost road construction is beyond fiscally irresponsible. (Individual, #1472.6.10420.800)

4-103 Public Concern: The Forest Service should not develop the forests for economic benefits.

BECAUSE SUCH DEVELOPMENT WOULD REDUCE THE QUALITY OF LIFE FOR LOCAL COMMUNITIES

It is shortsighted indeed to develop the forests in the name of the local economy when the development itself will undermine the quality of life supported by that economy. (Individual, #946.3.72000.770)

BECAUSE RECREATION PROVIDES MORE BENEFITS TO THE LOCAL ECONOMY

I spend thousands of dollars in the local economies of the areas that I travel to on hunting trips. Hunting and fishing recreational dollars are a much more sustainable use of the land and much better for the overall population of the area, versus the less sustainable operations of the corporations that log and mine these areas. (Individual, #1087.2.70600.560)

BECAUSE RECREATION-BASED TOURISM IS MORE SUSTAINABLE

I travel to western states in search of what I cannot find in New York. While it is true that some do benefit financially from mining and road building, in my opinion, recreational-based tourism on federally public roadless land, if managed properly, is more sustainable and provides broader economic benefits for Idaho and the rest of the nation. (Individual, #5.1.70600.800)

I have spent time hiking, backpacking, climbing, and fishing in Idaho primarily because of the pristine and remote backcountry found in the state. I know outdoor recreation is rising as an economic base for communities with such stunning lands, so maybe the focus needs to shift from degrading, short-term logging projects to sustainable, long-term tourism. (Individual, #1039.5.70600.200)

4-104 Public Concern: The Forest Service should promote sustainable forest stewardship.

TO PROVIDE STEADY, LONG-TERM TIMBER HARVESTING JOBS

The logging industry should be considering sustainable forest stewardship, an alternative that not only manages land wisely, but ensures the logging industry can provide steady, long-term jobs instead of the boom and bust cycle created by clearcutting practices. (Individual, #676.4.70300.800)

4-105 Public Concern: The Forest Service should rectify mismanagement of roads.

BECAUSE CRUMBLING ROADS ARE HARMING WILDLIFE

Because roads are crumbling, we're seeing harm to wildlife. That's mismanagement. I think it's very important that the Agency rectify that mismanagement, and it's a very important reason why this Agency should not be granted discretion to do more of this kind of damage in the future. (Individual, #218.105.64000.350)

4-106 Public Concern: The Forest Service should manage resource extraction wisely.**TO AVOID FRAGMENTATION OF THE FOREST**

Wisely managed, logging and natural gas exploration allow us to benefit from a natural resource. Historically, these industries have never required extensive road systems, which are often planned wide and paved. Once accessibility has been granted to a wide range of vehicles, utilities and amenities are brought in. This invariably leads to planning, construction, and development, which result in fragmentation of the woodlands, to the detriment of wildlife and the people who enjoy it. (Individual, #202.3.64100.331)

4-107 Public Concern: The Forest Service should not support the timber industry.

Corporate welfare for logging must stop. No more free roads in our forests, and no more clearcutting. (Individual, #378.5.10420.260)

4-108 Public Concern: The Forest Service should not support extractive uses.**BECAUSE COMPANIES SHOULD BE REQUIRED TO CLEAN UP
THE AREAS THEY HAVE ALREADY POLLUTED**

Prevent miners and loggers from going into our National Forests to build roads and pollute the natural environment. If mining is a good idea today, it will still be a good idea in 20 years after the mining companies have cleaned up their mess, eliminating the selenium pollution and returning these areas to their natural state. Similarly, the loggers will severely impact the environment with massive logging operations. (Individual, #920.1.40000.201)

4-109 Public Concern: The Forest Service should close Roadless Areas to all business interests except for livestock grazing.

I strongly oppose allowing the opening of National Forests and other public lands to business interests other than livestock grazing. (Individual, #1004.3.40000.510)

4-110 Public Concern: The Forest Service should not open Idaho Roadless Areas to commercial use.**BECAUSE THEY SUPPORT RECREATION, FISH AND WILDLIFE, AND SPECIAL-STATUS SPECIES**

This letter is written to oppose opening up of Roadless Areas to commercial use and development in Idaho. Idaho's Roadless Areas make up the core of the last intact forest ecosystem in the lower 48 states. National Forest Roadless Areas in Idaho are the cornerstone of the State's world-class hunting, fishing, and outdoor recreations heritage. They contain the headwaters of rivers, spawning Yellowstone cutthroat trout and other native trout and salmon populations. They're home to endangered, threatened, and rare species like grizzly bear, lynx, and wolverines. (Individual, #96.1.40000.350)

TO PROTECT THE PEACE AND QUIET THEY PROVIDE RESIDENTS AND VISITORS

Must we always seek to satisfy moneymaking desires to the detriment of natural, peaceful, quiet places? True, everything changes, but maybe the change price needs to be paid by those trying to make money from the protected places. (Individual, #310.2.40000.800)

4-111 Public Concern: The Forest Service should protect Idaho's Roadless Areas from resource extraction and commercial development.**BECAUSE ROADLESS AREAS GENERATE SIGNIFICANT REVENUES
FROM HUNTING AND FISHING LICENSES**

Hunters and anglers spend over \$500 million annually in Idaho, according to "Backcountry Bounty: Hunters, Anglers and Prosperity in the American West," a 2006 report by the Theodore Roosevelt Conservation Partnership and the Sonoran Institute. The Idaho Department of Fish and Game (DFG)

receives nearly \$40 million from hunting and fishing licenses. Nearly 90% of Idaho's hunters rely upon roadless forests for quality hunting. Opening up these Roadless Areas to resource development and commercial exploitation would be a mistake for the United States of America and for the world. (Individual, #96.2.41100.870)

BECAUSE ROADLESS AREAS SUPPORT WORLD-CLASS RECREATIONAL FISHING

Idaho hosts over 400,000 anglers every year. It is a worldwide mecca for fishing. The presence of bull trout, an endangered species, in a stream indicates a strong likelihood that desirable game fish are also present. Forest Service officials report that there are 53 healthy populations of bull trout in the Boise National Forest. Fifty of these populations are in Roadless Areas, and two others are in Wilderness areas. In contrast, the roaded portions of the Boise National Forest have many road crossings over fish-bearing streams, making 90% of these waterways not amenable for fish populations. Opening up these Roadless Areas to resource development and commercial exploitation would be a mistake for the United States of America and for the world. (Individual, #96.3.41120.870)

4-112 Public Concern: The Forest Service should limit the pace of extraction of natural resources.

TO PRESERVE THEM FOR FUTURE GENERATIONS

As a scientist who has been teaching in public school systems for over 30 years I know well the value of undisturbed ecosystems. In a world with 6,600,000,000 people and a growing population, it is important to slow down the extraction of our natural resources and to preserve the biological life support systems of our Earth. The welfare of the many children that I have taught over my career, as well as the welfare of my own two sons, is riding on the decisions we make today. Someone will always have a good reason to "develop" a resource and harvest a "crop of trees," but what seems like a lot of little beneficial decisions in reality is, in sum, a disaster. All the little "temporary" disruptions of our natural environment result in ecosystems that are in constant stress and, ultimately, the undermining of the system. There are, as I stated, 6.6 billion people riding on this space ship we call Earth, and their welfare depends on making sound ecological decisions. (Individual, #90.1.40000.2)

4-113 Public Concern: The Forest Service should not allow extractive uses.

TO PROTECT THE SCIENTIFIC VALUE AND POTENTIAL FOR BIOMIMICRY SOLUTIONS

There is now technology available in the field of biomimicry that would allow us to mine needed minerals like phosphate from polluted water and landfills, and make obsolete the need for more environmentally destructive mining practices, some of which would be allowed through this proposed plan. Biomimicry has shown how trees also hold recipes for surviving natural disasters like fire and windstorms and flood that we can incorporate into our own design principles when we build. It has also developed an inexpensive and nontoxic glue to use in the making of particleboard, based on the biochemistry of a blue mussel. None of these amazing nontoxic and affordable solutions were developed by "harvesting" these animals or plants en masse to "extract" what is useful, but by observing and experimenting with design and materials that replicate in an affordable and nontoxic way what they do for themselves on a design scale commensurate with human need. All have been successful. If we fool ourselves into thinking we "need" to keep harvesting and extracting and developing without listening, watching, learning from, and thanking the genius of nature, we will be destroying the recipe book for our own survival. (Individual, #4.5.70000.200)

**BECAUSE THE BENEFITS OF THESE USES ARE SHORT TERM, WHEREAS
THE BENEFITS OF PRISTINE WILDERNESS ARE LONG LASTING**

In this nation we already have greater wealth than anywhere else on the planet and we consume far, far more per capita resources, but are we satisfied? In fact, we are some of the least satisfied people in history and to think that the influx of wealth from developing this land will offer any kind of lasting benefit or satisfaction is to be completely ignorant and in denial of reality. Look to the future—a pristine wilderness is something that can be enjoyed indefinitely. The perceived benefits of mining and lumber

removal will be sorely temporary; the materials taken will only be used once before they no longer help anyone and will find their way to the landfill in almost no time at all. (Individual, #203.2.70000.770)

Energy Considerations

4-114 Public Concern: The Forest Service should support alternative forms of energy and building materials.

BECAUSE TIMBER HARVESTING AND MINING DEplete RESOURCES AND DESTROY THE LAND

It is pointless to destroy the country we've fought to preserve for a few dollars. Once the land is mined and logged, it becomes useless for both mining and forestry, and then where will those industries go? We desperately need to find alternative forms of energy and building materials. (Individual, #1116.2.70000.800)

4-115 Public Concern: The Forest Service should support environmentally sensitive timber, gas, and oil extraction.

I am OK with "environmentally sensitive" processes for timber harvesting with replanting and the exploration of oil and gas, similar to the Alaskan exploration experience within certain wilderness areas. (Individual, #350.2.40000.200)