

August 27, 2004

USDA Forest Service
Content Analysis Team
ATTN: Roadless State Petitions
USDA Forest Service
P.O. Box 221090
Salt Lake City , UT 84122

RE: Comments submitted to USDA Forest Service on the Proposed Roadless Rule.

To Forest Service Chief Dale Bosworth:

The Appalachian Mountain Club (AMC) offers the following comments on the proposed rule to create a state petitioning process for roadless area conservation. Founded in 1876 and headquartered in Boston, Massachusetts, the AMC is the nation's oldest non-profit conservation and recreation organization. Our 90,000 members include citizens from across the country, and our chapters range from Maine to Washington, DC. The AMC has a long-standing interest in the conservation and management of our National Forests. We were actively involved in the passage of the Weeks Act of 1911, which created the eastern National Forest system. We operate a series of mountain huts and lodges throughout the White Mountain National Forest in New Hampshire, and are partners with the USFS in a wide range of activities including trail maintenance, visitor services and education, search and rescue, and research. Though we are focused primarily on the northeast, we put a high priority on maintaining both the ecological integrity and the backcountry recreational opportunities of the entire National Forest system.

The AMC strongly opposes the proposed change to the Roadless Area Conservation Rule that would create a state-based petition process. The proposed rule creates a cumbersome and unnecessary process that will lead to inconsistent results across the National Forest System, whose outcome is uncertain, and which does not provide adequate protection to these ecologically valuable areas. We urge the Forest Service to return to the spirit and intent of the original 2001 rule.

We have the following specific concerns:

- The proposed rule puts the effective decision as to whether roadless areas will be protected in the hands of state governors, who are not responsible to a national constituency. These are federal lands, owned by all the citizens of the country, and decisions as to their management should remain at the federal level.
- The proposed state-based petition process will disenfranchise millions of citizens with an interest in National Forest management. It is unlikely that the views of non-residents will receive adequate consideration by state officials.
- The proposed petition process puts an undue burden on state officials and resource agencies, many of which are struggling under tight budgets and limited staffing. Even if

governors are inclined to submit a petition, the administrative burden may limit their ability to do so.

- It is likely that many governors will decline to submit a petition, leaving roadless areas in those states with no specific rules governing their management. Instead, roadless area management will revert to individual forest plans, which was the situation prior to the implementation of the original rule. It is inappropriate that state officials have the power to effectively revoke a widely-supported national initiative.
- The end result of the process will be a patchwork of state-specific rules, or in many cases no rules at all. In cases where a forest encompasses land in more than one state (such as the White Mountain National Forest in New Hampshire and Maine) roadless areas within a single forest may be governed by very different rules. This type of inconsistency in the management of federal lands is neither desirable nor appropriate.
- The proposed rule ignores the strong scientific justification for the conservation of roadless areas, as described in the Forest Service Roadless Area Conservation Final Environmental Impact Statement (November 2000).
- The proposed rule completely ignores the public comment received during the original rule-making process. Over one million citizens submitted comments during the largest public involvement project in the history of the Department of Agriculture. These comments overwhelmingly favored strong protection for roadless areas. Instead the Forest Service has proposed a vastly weaker rule whose end result is uncertain, but which will almost certainly be much more limited protection for these areas.

The AMC believes that maintaining and restoring the health and integrity of ecosystems should be the primary goal of National Forest management. Within the constraints of this overriding principle, we continue to support the management of National Forests under the multiple use concept, and support Forest Service efforts to maintain the existing range of uses on these forests. However, in light of new scientific understanding, changing public expectations, and increasing demands on our natural resources, the AMC believes there are strong reasons to alter the relative balance of these uses to provide greater protection for large natural areas.

When roadless areas were first delineated during the RARE II process, the sole purpose was for the identification of potential Wilderness. Areas not designated as Wilderness received no special consideration, but were dealt with by individual forest plans. Since that time the Forest Service road system has expanded by about 70% to 386,000 miles¹, impacting large areas of previously unroaded forest. Nearly 60% of the inventoried roadless areas nationwide allow additional road construction under current forest plans², which may lead to additional erosion of roadless area values in the absence of strong national direction for their conservation. However, the Forest Service clearly cannot adequately maintain its existing road system - in 1998 the Forest Service estimated that it had a road maintenance backlog of \$8.4 billion³.

In the quarter-century since RARE II, an ever-expanding literature in the new fields of conservation biology and landscape ecology has recognized the value of large natural areas for the conservation of our planet's biological heritage. The negative impacts of roads on the health

¹ Roadless Area Conservation Final Environmental Impact Statement, Figure 3-8.

² Roadless Area Conservation Final Environmental Impact Statement, Appendix A.

³ Roadless Area Conservation Final Environmental Impact Statement, page 1-5.

of terrestrial and aquatic ecosystems have been well documented. Late-successional and old-growth forests (once described as decadent, stagnant, over-mature, or biological deserts), which are most likely to be maintained or restored in roadless areas, are now recognized as the most biologically diverse portion of the successional sequence⁴. A nationwide study published in 2003 in the journal *Conservation Ecology*⁵ stated, “We conclude that IRAs belonging to the U.S. Forest Service are one of the most important biotic areas in the nation, and that their status as roadless areas could have lasting and far-reaching effects for biodiversity conservation.”

Our greatest (and most difficult) responsibility is to pass along the biological richness of our world undiminished to the future. As the nation’s pre-eminent public land management agency, the Forest Service has a responsibility not only to current users of National Forest lands, but to all future generations. The great majority of lands outside the National Forest system are increasingly being altered to meet human needs. The remaining roadless areas on the National Forest system represent our single best opportunity to maintain large areas in a natural condition and conserve the full range of biodiversity that they contain.

In addition, the Forest Service is the largest single provider of outdoor recreation opportunities in the country. Much of this recreation occurs in unroaded backcountry areas, which draw visitors seeking to experience the aesthetic and spiritual values of large wild places. The economic benefits associated with this recreation are a large and increasingly important component of the economies of communities adjacent to National Forests. We believe the benefits (to both current and future generations) associated with maintaining roadless areas in an essentially natural condition far outweigh the short-term benefits derived from commercial resource extraction in these areas.

We urge the Forest Service to withdraw the current proposed rule and to focus on developing a strong, nationally consistent and legally defensible rule that maintains the intent of the original Roadless Area Conservation Rule. While we do not believe that all roadless areas must be managed as *de facto* Wilderness, we believe that the following basic provisions of the original rule should be maintained: 1) no new road construction should take place in Inventoried Roadless Areas, except as allowed under the original rule, and 2) management activities within these areas should be limited to clearly-defined actions necessary to maintain or restore the ecological integrity of ecosystems and species.

We also believe that the rule should ensure that additional roadless areas identified subsequent to the rule are automatically covered by rule provisions. As an example, the White Mountain National Forest has 241,000 acres of roadless area included in the original Final Environmental Impact Statement. However, an update of the roadless area inventory conducted as part of the WMNF plan revision has increased this to 383,000 acres (indicating the highly conservative nature of the original RARE II delineations). We have received conflicting opinions as to whether this additional roadless area would be covered by the rule - this needs to be made clear.

⁴ Hunter, Malcolm L. Jr. 1990. *Wildlife, Forests and Forestry: Principles of Managing Forests for Biological Diversity*. Prentice Hall, Inc., Englewood Cliffs, NJ (page 65).

⁵ Loucks, C., N. Brown, A. Loucks, and K. Cesareo. 2003. USDA Forest Service roadless areas: potential biodiversity conservation reserves. *Conservation Ecology* 7(2): 5. [online] URL: <http://www.consecol.org/vol7/iss2/art5>

We thank the Forest Service for the opportunity to comment on the proposed rule. If you have any questions about these comments, feel free to contact Director of Conservation Susan Arnold (617-523-0655 ext. 353) or Senior Staff Scientist David Publicover (617-466-2721 ext. 200).

Respectfully,

Andrew J. Falender
Executive Director

CC: The Honorable Judd Gregg
The Honorable John Sununu
The Honorable Charles Bass
The Honorable Jeb Bradley
Thomas G. Wagner, WMNF Supervisor