



# 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—Appendices

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# Appendix A

## Content Analysis Process

Public responses on the proposed National Forest System Lands in Idaho Draft Environmental Impact Statement (EIS) were analyzed and categorized using a process called content analysis. The content analysis process consists of sorting responses, analyzing them, entering the analysis into a database, and using database reports to write a Summary of Public Comment that summarizes the concerns raised in the responses. The goals of the 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.
- Present those concerns in such a way as to facilitate the Forest Service's consideration of comments.

A response is a single, whole submission that may take the form of a letter, email, fax, presentation at a public meeting, etc. Responses are sorted to identify all unique responses. Some letters are signed by different individuals but have identical content; these are called "form letters," and only one example of each form letter type is analyzed as a unique response. Some individuals have submitted form letters but have added information to them; these are called "form plus letters," and only the added information that is not redundant to the content of the form is analyzed as a unique response.

Names and addresses for respondents who sent in a unique or form plus response are entered into a project-specific database. All form letters sent in by respondents are counted (see Appendix E). Analysts read and code unique and form plus responses using the coding structure (see Appendix B). Each comment is coded by subject and verified by a second analyst for accuracy and consistency. Then all coded comments are entered verbatim into a comment database. Database reports track all input and allow analysts to identify the public's concerns and to analyze the relationships among them. The final analysis document includes an executive summary, which discusses respondents' main areas of concern, and a formal list of public concern statements. Each public concern statement is accompanied by one or more sample excerpts from original responses.

This process and resulting documentation do not replace responses in their original form. Rather, they provide a map to the responses. It is important to recognize that the consideration of public comment is not a vote-counting process in which the outcome is determined by the majority opinion. Relative depth of feeling and interest among the public can serve to provide a general context for decision-making. However, it is the appropriateness, specificity, and factual accuracy of comment content that provide the basis for modifications to planning documents and decisions. Further, because respondents are self-selected, they do not constitute a random or representative public sample. The Forest Service encourages all interested parties to submit comment as often as they wish regardless of age, citizenship, or eligibility to vote. Respondents may therefore include State, local, and tribal governments; organizations (or public interest groups); businesses; people from other countries; children; and people who submit multiple

responses. Therefore, caution should be used when interpreting comparative terms in the Summary of Public Comment. Every substantive comment and suggestion has value, whether expressed by one respondent or many. All unique input is read and evaluated, and the analysis team attempts to capture all relevant public concern in the content analysis process.

# Appendix B

## Coding Structure

### Action Codes

#### Processes

##### PRCSS 10000–19999 (Including State Petition Process)

- 10000 – Decision-making Process and Methods
  - 10100 – Role/Authority
    - 10110 – Federalism/States Rights
  - 10200 – Coordination and Consultation with the Public and Other Agencies
  - 10300 – Coordination and Consultation with Tribes
  - 10400 – Influences on Decision-making
    - 10410 – Political/Partisan Interests
    - 10420 – Interest Groups
    - 10430 – Use of Public Comment/Public Opinion
    - 10440 – Trust/integrity
- 11000 – Decision-making Philosophy (how, not what, to decide)
  - 11100 – Multiple Use Emphasis
  - 11200 – Ecosystems Protection Emphasis
  - 11300 – Adaptive Management Emphasis
- 12000 – Public Involvement
  - 12100 – Agency Communication
    - 12110 – Adequacy/Availability of Information
    - 12120 – Public Meetings/Hearings
  - 12200 – Adequacy of Comment Period (incl. comment period over holidays)
  - 12300 – Adequacy of Entire Timeframe
  - 12400 – Collaboration
  - 12500 – Public Outreach/Education
  - 12600 – Availability of Information
  - 12700 – Use of Contractors for Content Analysis
- 13000 – Use of Science; Best Avail. Science
- 14000 – Agency Organization, Funding and Staffing
  - 14100 – Funding, General
  - 14200 – Staffing General
- 15000 – Appeals and Objections
- 16000 – Enforcement
- 17000 – RACNAC

#### Proposed Rule

##### RULES 20000–25999

- 20000 – Purpose and Need for Rule
- 21000 – Document General (Rule)
  - 21200 – Technical and Editorial (spelling, grammar, consistency)
- 22000 – Rule's Consistency with Other Laws and Policies
  - 22100 – Federal Laws and Policies
    - 22110 – Revised Statute (R-S) 2477 (state/local rights to historic roads on public land)
    - 22111 – Endangered Species Act (ESA)
    - 22112 – Clean Water Act (CWA)
    - 22113 – National Forest Management Act (NFMA)
    - 22114 – Americans with Disabilities Act (ADA)
    - 22116 – Multiple Use and Sustained Yield Act (MUSYA)
    - 22117 – Mining/Mineral Laws
    - 22118 – Administrative Procedures Act (APA)
    - 22119 – Management Policies of Adjacent Federal/State Lands
    - 22120 – Native American Treaty Rights
    - 22121 – Executive Order 12866, Regulatory Planning and Review

- 22122 – Executive Order 13272 (proper consideration of small entities)
- 22123 – Small Business Regulatory Enforcement Fairness Act of 1996
- 22129 – Executive Order 13175, Consultation and Coordination with Indian Tribal Governments
- 22130 – Other Executive Orders or Acts
- 22200 – State and Local Laws and Policies
- 22300 – Other Planning Processes
  - 22310 – Individual National Forest Plans
  - 22320—Healthy Forest Initiative
  - 22330 – National Fire Plan
  - 22340 – State and Local Planning Processes
- 23000 – Rule General
  - 23100 – Management Themes
    - 23200 – Wild Land Recreation
    - 23300 – Special Areas of Historic and Tribal Significance
    - 23400 – Primitive
    - 23500 – Backcountry/Restoration
    - 23600 – General Forest, Rangeland, Grassland
    - 23700 – Other Forest Plan Special Areas

**Alternatives and EIS****ALTER 30000–39999**

- 30000 – DEIS, General
  - 31000 – Adequacy of Environmental Analysis/Scope of Issues to be Addressed
  - 32000 – Compliance with NEPA (does the EIS meet the requirements of NEPA)
  - 33000 – Alternatives, General
    - 33100 – Alternative Development/Method/Range
    - 33200 – Suggestion for New Alternatives
    - 33300 – Alternative 1. 2001 Roadless Rule (No Action)
    - 33400 – Alternative 2. Existing Plans
    - 33500 – Alternative 3. Idaho Roadless Rule (Proposed Action)

**Natural Resources Management****NRMGT 40000–49999**

- 40000 – Natural Resources Management General
  - 41000 – Biological Elements
    - 41100 – Wildlife Management
      - 41110 – Terrestrial Species
      - 41120—Aquatic Species
    - 41200 – Vegetation Management
      - 41210 – Terrestrial Plant Species
      - 41220 – Aquatic Plant Species
    - 41300—Affected Special-status Species
    - 41400 – Sensitive Species
    - 41500 – Reference Landscapes
    - 41600 – Biodiversity
    - 41700 – Fragmentation
  - 42000 – Timber Resource Management
  - 43000 –Forest Health and Fire Ecology
    - 43100— Fire and Fuels Management
      - 43110 – Fire Suppression
      - 43120 – Burned Area Emergency Rehab
    - 43200 – Insect and Disease Control
  - 44000 – Mining and Mineral Exploration
    - 44100 – Locatable Minerals
    - 44200 – Leasable Minerals
      - 44210 – Phosphate
      - 44220 – Geothermal
    - 44300 – Salable Minerals
    - 44400 – Abandoned and Inactive Mines
  - 45000 – Atmospheric Resources (Noise, Air, Climate Change)
  - 46000 – Physical Resources
    - 46100 – Water Resources

- 46110 – Water Quality
- 46120 – Water Quantity
- 46130—Drinking Water/Water Supply
- 46200 – Channel Morphology
- 46300—Soil, Site Productivity, Landslides
- 46400 – Geological and Paleontological Resources
- 47000 – Roadless Character (general)

**Recreation Management**

**RECRE 50000–59999**

- 50000 – Recreation Management, General/Multiple
- 51000 – Recreation Opportunity Spectrum (incl. designate more of this, less of that, group size, etc.)
- 52000 – Recreational Access General
  - 52100 – Non-Motorized Access
  - 52200 – Motorized Access
- 53000 – Developed Recreation/Recreation Facilities
- 54000 – Dispersed Recreation
  - 54100 – Hunting and Fishing
- 55000 – Trailheads, Signs, Parking
- 56000 – Fee Demonstration Project/User Fees
- 57000 – Recreation Permitting
- 58000 – User Education, General/Multiple
  - 58100 – Environmental Education Programs
- 59000 – Scenic Quality

**Lands and Special Designations**

**LANDS 60000–69999**

- 60000 – Public Land Ownership/Boundaries/Access
  - 60100 – Private Inholdings
  - 60200 – Other Non-federal Ownership
- 61000 – Non-recreation Special Uses (utility corridors, comm. sites, etc.)
- 62000 – Land Designations/Management
  - 62200 – Wilderness
    - 62210 – Other Special Designations (WSR, etc.)
  - 62400 – Research Natural Areas/ACECs
  - 62500 – National Scenic Roads and Trails
  - 62600 Cultural/Historic Areas
- 63000 – Roadless Area Boundaries/Inventory
- 64000 – Roads Management (non-resource specific)
  - 64100 – Road Construction/Reconstruction/Maintenance
  - 64200 – Road Closures/Decommissioning
  - 64300— Temporary Roads

**Social and Economic**

**SOCEC 70000–79999**

- 70000 – Social/Economic Actions or Activities
  - 70100 – Grazing
  - 70200 – Non-timber Forest Products
  - 70300 – Timber Harvest Wood Products Industry
  - 70400 – Mineral Industry
  - 70500—Transportation Systems
  - 70600 – Recreation and Tourism
  - 70700 – Second Homes
- 71000 – Non-commodity Values
- 72000 – Forest-dependent Communities
- 73000 – Native Americans
- 74000 – Public Health and Safety
- 75000 – Civil Rights/Environmental Justice

**ATTMT–99999 – Attachment**

**Option Code 1: Document Reference**

- 001 – Neither/Both (comment refers to neither or both the DEIS or the Rule)

- 002 – DEIS (comment refers to the DEIS)  
003 – Rule (comment refers to the Rule)

## Rationale Codes

- 001 – No Affected Resource/Reason  
002 – Multiple Affected Resources/Reasons  
(Envir, Rec, Socio, Econ)
- 010 – Persons and Groups  
020 – Government  
    021 – President/Executive Branch  
    023 – Agency (Forest Service)  
    025 – Other Federal Agencies  
    027 – Legislative Branch (Congress)  
    029 – Judicial Branch (Courts)
- 030 – State, County, and Municipal Governments  
040 – American Indians/Tribes  
050 – Interest Groups  
    051 – Environmental Groups  
    053 – Multiple Use/ Wise Use Groups  
    055 – Recreation Groups  
    057 – Industry/Business Groups (econ. issues to 900+)  
    059 – Political Parties
- 060 – General Public  
    061 – Local Citizens/Communities  
    063 – Nationwide Citizens/Communities
- 100 – Laws, Policies  
110 – Democracy  
120 – Federal, General/Multiple  
    121 – Constitution  
    123 – Federalism, States Rights  
    125 – Individual Rights, Public Own Fed Lands  
    127 – General Welfare, Public Good, Public Interest
- 130 – Federal Laws  
    131 – NEPA  
    133 – NFMA  
    135 – Endangered Species Act
- 140 – Court Decisions (past or pending)  
150 – Tribal Treaties  
160 – Agency Rules, Plans, Policies  
    161 – Appeals and Objections  
    163 – National Fire Plan  
    165 – Enforcement
- 170 – Rules, Plans, etc. of Other Federal Agencies  
180 – Rules, Plans, etc. of States  
190 – County or Municipal Rules, Plans, etc.
- 200 – Natural Environment, General/Multiple (national treasure, national heritage, pristine areas)  
    201 – Environmental Quality and Ecosystem Integrity  
    203 – Inherent Worth of the Environment (apart from human benefits/use/enjoyment/need)  
    205 – Forest Health  
    206 – Roadless Character (general)
- 220 – Physical Elements, General/Multiple  
230 – Soils and Geology. Landslides  
240 – Water Resources  
    241 – Drinking Water/Water Supply

- 242 – Water Quantity
- 243 – Water Quality
- 250 – Air Resources/Climate Change
- 260 – Forest Health and Fire Ecology
  - 261 – Timber Cutting
  - 262 – Fuels Management (General)
  - 263 – Fuels Management – WUI, CWPP
  - 264 – Fire Suppression
  - 265 – Burned Area Rehab
  - 266 – Insect and Disease Control
- 300 – Biological Elements General/Multiple Biological Resources
- 310 – Biodiversity, Extinctions
- 320 – Genetic Diversity
- 330 – Ecosystem/Habitat Composition and Function
  - 331 – Fragmentation, Perforation, and Connectivity
  - 333 – Disturbance Regimes
  - 335 – Habitat/Vegetation Composition
  - 337 – Clearings/Canopy Openings
- 340 – Species of Special Concern, General/Multiple
- 350 – Wildlife/Animals/Plants General/Multiple
  - 351 – Terrestrial Species
  - 352 – Aquatic Species
  - 353 – Plant Species
  - 355 – Special Status Species (incl. TEPL species)
  - 356 – Sensitive Species
  - 357 – Reference Landscapes
- 400 – Minerals/Geology
- 410 – Locatable Minerals
- 420 – Leasable Minerals
  - 421 – Oil, Gas
  - 422 – Coal
  - 423 – Phosphate
  - 424 – Geothermal
- 430 – Salable Minerals
- 440 – Abandoned/Inactive Mines
- 450 – Geological/Paleontological Resources
- 500 – Recreation: General/Multiple/Other
- 510 – Dispersed
- 520 – Developed
- 530 – Motorized Recreation
- 540 – Non-Motorized Recreation
- 550 – Scenic Quality
- 560 – Hunting and Fishing
- 600 – Lands, Special Designations (General/Multiple)
- 610 – Real Estate Management
- 620 – Roadless Area Boundaries, Designations, Inventories
- 630 – Access to Non-federal Ownership
- 640 – Non-recreation Special Uses
- 650 – Wilderness
- 660 – Other Special Designations
- 670 – Heritage Resources
- 680 – Roads Management
- 700 – Social – General/Multiple
- 710 – Quality of Life (tradition, traditional way of life)
- 720 – Trust and Credibility
- 730 – Anthropological Heritage and Cultural Resources
- 740 – Future Generations, Legacy Values



- 750 – International: Transfer of Effects or Role Model
- 760 – American Indian Values/Traditions
- 770 – Non-commodity Values
- 780 – Civil Rights/Environmental Justice
- 790 – Public Health and Safety

- 800 – Economic Conditions and Values, General/Multiple
- 810 – Grazing
- 820 – Non-timber Forest Products
- 830 – Timber Harvest/Wood Products Industry
- 840 – Mineral Industry
- 850 – Oil and Gas Industry
- 860 – Transportation systems
- 870 – Recreation
- 880 – Second Homes
- 890 – Forest Dependent Communities

## Letter Attribution Codes

**Header Order:** MID, OT, S, RT, and DT fields are required. IA, UT, LG, F, CIC, RI, and CE fields are used on a project-specific basis. A stamp containing these fields will be placed on the working copy.

Data Entry will fill in the MID field. Coders will identify organization type, number of signatures, response type, and delivery type on all letters and fill in the proper box. Use UT (User Type) fields only if this information is requested by the client. Fill in additional fields when appropriate.

|     |    |   |    |    |    |    |    |   |     |    |    |  |
|-----|----|---|----|----|----|----|----|---|-----|----|----|--|
|     |    |   |    |    |    |    |    |   |     |    |    |  |
| MID | OT | S | RT | DT | IA | UT | LG | F | CIC | RI | CE |  |

### MID FIELD – Mail Identification – *required*

**MID** is a unique respondent number assigned in the CAT Oracle Program. The Oracle form contains mailing information needed to create mailing labels and also is needed to obtain project specific demographic information about a respondent.

### OT FIELD – Organization Type – *required*

The **Organization Type** code identifies a specific type of organization, association, agency, elected official or individual. A response is assigned an organization type other than Individual ONLY if the respondent is speaking on behalf of the organization, NOT if they are merely members or employees of the organization. Generally these respondents will show their title with their name, such as president, director, field representative, or other official

title. When in doubt, you may check either by telephone call to the Content Analysis Team or by searching the Internet for the names of organization representatives.

Employees of governmental agencies or organizations are usually determined to be speaking on behalf of the agency or organization if the submission is on official letterhead or is sent from a government email address. Elected officials may sometimes submit comments on plain paper, from a personal email, or even sign a form letter; but if they identify themselves as elected officials, they are still given the org type codes appropriate for the level of government for which they are officials. The following are standard organization type codes; other codes may be included if needed on a specific project.

## Standard Organization Types:

### **Government Agency/Elected Officials**

| <i>Code</i> | <i>Description</i>  |
|-------------|---|
| F           | Federal Agency/Elected Official                           |
| N           | International Government/Association                      |
| S           | State Government Agency/Elected Official/Association      |
| C           | County Government Agency/Elected Official/Association     |
| T           | Town/City Government Agency/Elected Official/Association  |
| Q           | Tribal Government/Elected Official/Agency                 |
| XX          | Regional/Other Governmental Agency (multi-jurisdictional) |

### **Interest Group (includes legal representatives of or lobbyists for interest groups)**

|    |   |
|----|---|
| A  | Agriculture Industry or Association (Farm Bureau)   |
| B  | Business [ <i>affected</i> business] (someone speaking for or as a business owner, chamber of commerce) |
| D  | Place Based Group (homeowner's associations, planning cooperatives; e.g., Quincy Library Group)         |
| E  | Government Employee/Union   |
| G  | Domestic Livestock Industry (incl. permittees, commercial ranchers)                                     |
| H  | Consultants/Legal Representatives   |
| I  | Individual (unaffiliated, unknown or unidentifiable)  |
| J  | Civic Group (Kiwanis, Elks, Community Councils)   |
| K  | Special Use Permittee (Rec. homes, Ski Resort, Outfitter/Guide)   |
| L  | Timber or Wood Products Industry or Association   |
| M  | Mining Industry/Association (locatable)   |
| O  | Oil, Natural Gas, Coal, or Pipeline Industry (leasable)   |
| P  | Preservation/Conservation   |
| R  | Recreational (non-specific)   |
| U  | Utility Group (water, electrical, gas)  |
| V  | Professional Society  |
| W  | Academic (professor, research scientist, university department)   |
| X  | Conservation District   |
| Y  | Other or Unidentified Organization  |
| Z  | Multiple Use or Land Rights Organization  |
| AE | Agency Employee (analyzed separately)   |
| AR | Animal Rights (humane treatment org)  |
| CH | Church/Religious Group  |
| PI | Public Interest Group/Political Party   |
| LO | Private Land Inholding Owner  |

QQ Tribal Non-Governmental Organization/Tribal Member

Codes can be broken out further to accommodate particular projects, such as:

RB Mechanized Recreation (bicycling)  
 RC Recreation/Conservation Organization (Trout Unlimited, Elk Foundation)  
 RM Motorized Recreation (4X4, OHV, snowmobiling)  
 RN Non-motorized/Non-mechanized Recreation (hiking, x-c ski, horse/stock animals)

### Notes on Organization Type Identification:

Letters from businesses are categorized as “**B**” only if you believe or they assert they are impacted by the decision; otherwise they are considered to be individual responses. A letter from a member of an organization is considered to be an individual response unless the author is representing the organization in an official capacity.

Letters from government employees submitted as personal are categorized as “**I**” rather than as codes F, N, S, C, T Q, which are reserved for official comments from an elected official or government agency or department. Letters from government employees submitted on government letterhead or via government email are considered to be internal comment, *and are separated from public comment and analyzed separately.*

### S FIELD – Signatures – *required*

To determine the number of *Signatures*, look first at the signature itself. If the correspondence is signed *John Doe*, but the return address says John and Jane Doe, count it as one signature, because it was signed by one person. If the return address says John Doe, but is signed by *John and Jane Doe*, or *Mr. and Mrs. Doe*, count it as two signatures. If no signature is present or response is anonymous, count it as one. If signed *John Doe and Family*, count it as one.

### RT FIELD – Response Type – *required*

The *Response Type* identifies the specific format of the correspondence.

| Code | Description  |
|------|--|
| 1    | Letter   |
| 2    | Form or Letter Generator                                 |
| 3    | Resolution   |
| 4    | Action Alert   |
| 5    | Transcript (dictated audio, video or telephone response) |
| 6    | Form Plus  |
| 7    | Public Meeting Transcript (hearing/oral testimony)       |
| 8    | Public Meeting/Workshop Group Notes                      |
| 9    | Workshop Notes (other than at public meetings)           |
| 10   | Petition   |

## DT FIELD – Delivery Type – *required*

The *Delivery Type* is the method by which the response was transmitted by the respondent.

| <i>Code</i> | <i>Description</i>                                      |
|-------------|---|
| E           | Email   |
| F           | FAX   |
| H           | Hand-delivered or Oral Testimony (personally delivered) |
| M           | US Mail or Commercial Carrier (UPS, FedEx)              |
| T           | Telephone   |
| W           | Web-based Submission (regulations.gov, FDMS, etc.)      |
| U           | Unknown   |

## IA FIELD – Early Attention – Red Flags (*place on LEFT side of copy*)

*Early Attention* codes are applied only to those documents requiring an immediate response from the team. The Early Attention codes are listed in order of priority. If more than one code applies to a single document, the code with the highest priority is attached. For example, if a State Congressman threatens bodily harm to a Forest Service representative, the letter would receive a “1” instead of a “6”. A red flag is attached to the left side of the page with the IA code written on it.

| <i>Code</i> | <i>Description</i>                        |
|-------------|---|
| 1           | Threat of Harm                            |
| 2           | Notice of Appeal or Litigation            |
| 3           | Freedom of Information Act (FOIA) Request |
| 4           | Provides Proposals for New Alternatives   |
| 5           | Requires Detailed Review                  |
| 6           | Government Entities                       |
| 7           | Requests Public Hearing                   |

### **Optional IA Codes (Project Specific)**

|    |   |
|----|---|
| 5a | Provides Extensive Technical Edits – Deletions/Replacements |
| 5m | Map(s) Attached   |
| 6a | Requests Cooperating Agency Status                          |

## UT FIELD – User Type

Not used for this project.

## LG FIELD – Letter Generator

A *Letter Generator* is a response that enables respondents to extract specific text from a selection of prewritten comments. These responses are usually created through an interactive website that offers a selection of comments and allows the respondent to choose which

paragraphs to include in their personal letter. Assign a consecutive LG number to these responses. Enter this number.

## F FIELD – Forms (Organized Response Campaigns)

*Forms* or organized response campaign responses are identified when the mail processor receives 5 or more responses with identical text from different (unaffiliated) respondents. Enter the form number assigned by the team.

## CIC FIELD – Common Interest Class

Not used for this project.

## RI FIELD – Requests for Information – Blue flag *(place on LEFT side of copy)*

*Requests for Information* codes are applied only to those responses with specific requests for information pertaining to the proposal. The client determines the level of specificity for identifying information requests. A blue flag is attached to the left side of the page with the IR code written on it.

| <i>Code</i> | <i>Description</i>  |
|-------------|---|
| A           | Mailing List Only or Nothing to Code <i>(do not attach a flag)</i>    |
| B           | Request to be Removed from Mailing List <i>(do not attach a flag)</i> |
| C           | Request Copy of Federal Register Notice                               |
| D           | Other Request for Specific Information                                |
| E           | Request for Confirmation of Receipt of Letter                         |

### **Optional RI Codes (project specific)**

|    |   |
|----|---|
| F  | Request for Hard Copy of Summary of the DEIS                      |
| G  | Request for Full Hard Copy of DEIS                                |
| H  | Request for Full CD Version of DEIS                               |
| I  | Request for Hard Copy of Summary of FEIS                          |
| J  | Request for Full Hard Copy of FEIS                                |
| K  | Request for CD Version of FEIS                                    |
| L  | Request for Draft Copy of Proposed Rule/Policy                    |
| M  | Request for Final Copy of Rule/Policy                             |
| Ch | Request for Hard Copy of Fed Register Notice of the Proposed Rule |
| Cd | Request for CD of Fed Register Notice of Proposed Rule            |
| Ce | Request for Electronic Copy of Fed Register of Proposed Rule      |

## CE FIELD – Comment Extension – Yellow Flag *(place on LEFT side of copy)*

*Comment Extension* codes are used when a respondent has a specific request for extending the comment period.

---

| <i>Code</i> | <i>Description</i>                           |
|-------------|--|
| 0           | No Specific Time Mentioned or Other          |
| 15          | Request for 15 Day Comment Period Extension  |
| 30          | Request for 30 Day Comment Period Extension  |
| 45          | Request for 45 Day Comment Period Extension  |
| 60          | Request for 60 Day Comment Period Extension  |
| 90          | Request for 90 Day Comment Period Extension  |
| 120         | Request for 120 Day Comment Period Extension |

# Appendix C

## Public Concern List

### Introduction

Public Concerns are derived directly from public comment. Each represents the gist of a statement of concern made by the public. Public Concerns may be derived from one person’s input but often represent the view of many respondents. They are intended to aid decision-makers in characterizing the issues to be analyzed. They may also provide a framework for preparing responses to public comment.

Primarily, Public Concerns serve to guide readers to public comment on specific topics. As such, this index is intended to be used as a cross-reference to Public Concerns listed in Chapters 1 through 4 of the Summary of Public Comment. Readers may identify their areas of concern within the list provided in this index and then reference the relevant portion of Chapters 1 through 4. There they will find sample quotes in support of the Public Concern. Each sample quote includes a letter number reference should users wish to look at the original letter.

### Index of Public Concerns

|   |     |
|---|-----|
| Chapter 1: Rulemaking Process, Public Participation, and Agency Involvement.....  | 1-1 |
| RULEMAKING PROCESS.....   | 1-1 |
| <i>General Considerations</i> .....   | 1-1 |
| 1-1 Public Concern: The Forest Service should not use the<br>Administrative Procedures Act to modify the 2001 Roadless Rule.....  | 1-1 |
| Because it is an inappropriate use of the Act .....   | 1-1 |
| Because it would set dangerous precedents.....  | 1-1 |
| 1-2 Public Concern: The Forest Service should implement the Idaho<br>Roadless Rule in a timely fashion and continue to include county<br>commissions in the process. .... | 1-1 |
| Because the process used to develop the Rule was sound .....  | 1-1 |
| 1-3 Public Concern: The Forest Service should continue to rely on the<br>Roadless Area Conservation National Advisory Committee to<br>provide advice and counsel.....     | 1-2 |
| 1-4 Public Concern: The Forest Service should be realistic about<br>challenges to its proposal. ....  | 1-2 |
| Because the Idaho Roadless Rule is likely to generate law suits.....  | 1-2 |
| 1-5 Public Concern: The Forest Service should wait to act until the legal<br>uncertainty surrounding the 2001 and 2005 Roadless Rules is<br>resolved.....                 | 1-2 |
| To ensure that management of Roadless Areas can continue to<br>be consistent with Forest Plans .....  | 1-2 |

1-6 Public Concern: The Forest Service should abide by the court ruling that set aside the 2005 Rule..... 1-2

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    Once the Wildland-Urban Interface and watershed areas are  
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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. .... 2-80

    To make management of those areas equivalent to the 2001  
Rule ..... 2-80

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Backcountry/ Restoration management theme. .... 2-80



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Because many of these areas should be assigned a more protective management theme .....2-83

2-157 Public Concern: The Forest Service should not classify Roadless Areas as General Forest. ....2-83

Because these areas need more protections, not fewer .....2-83

2-158 Public Concern: The Forest Service should divide the General Forest, Rangeland, and Grassland management theme into two themes. ....2-83

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2-160 Public Concern: The Forest Service should not classify the Selkirk Mountains as General Forest. ....2-84

To protect them from exploitation by special interests .....2-84

2-161 Public Concern: The Forest Service should not classify the Selkirk and Kootenai Mountains as General Forest. ....2-84

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Because the decrease in habitat integrity will negatively affect mule deer.....2-85

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|   |      |
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| Because the area provides low-density motorized access.....   | 2-89 |
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| Because the area provides clean water .....   | 2-89 |
| Because reclassification is consistent with the Forest Plan .....   | 2-89 |
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| Because the Agency rates the rates the natural integrity as high ...  | 2-89 |

Because the area provides low-density motorized access.....2-89

Because the area provides clean water .....2-90

To protect the migration corridor and summer range of big game species.....2-90

Because the area contains Bonneville cutthroat trout.....2-90

Because reclassification is consistent with the Forest Plan .....2-90

2-177 Public Concern: The Forest Service should reclassify the Garns Mountain Roadless Area from Backcountry/Restoration to Primitive or Wild Land/ Recreation.....2-90

    To preserve populations of native Yellowstone cutthroat trout and moose .....2-90

*General Forest to Backcountry/Restoration*.....2-90

2-178 Public Concern: The Forest Service should reclassify unroaded and unlogged areas from General Forest to Backcountry/Restoration.....2-90

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    To be more consistent with existing Forest Plans .....2-91

2-180 Public Concern: The Forest Service should reclassify areas in southern Idaho from General Forest to Backcountry/Restoration. ....2-91

    To protect sage-grouse.....2-91

2-181 Public Concern: The Forest Service should reclassify areas in the Caribou National Forest from General Forest to Backcountry/Restoration. ....2-91

2-182 Public Concern: The Forest Service should reclassify the northern part of Napoleon Ridge from General Forest to Backcountry/Restoration. ....2-92

    To ensure that timber harvest does not negatively affect visual resources .....2-92

2-183 Public Concern: The Forest Service should reclassify portions of the Toiyabe Roadless Area from General Forest to Backcountry/Restoration. ....2-92

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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. ....2-92

    Because these areas are steep, provide little commercially viable timber, have scenic characteristics, and provide habitat for mule deer.....2-92

2-185 Public Concern: The Forest Service should reclassify the General Forest acres in the Meade Peake Roadless Area to Backcountry/Restoration. ....2-92

    Except for the acres in the Known Phosphate Lease Areas .....2-92

    Because there are three motorized trails, but no roads .....2-92

    Because Meade Peak is the tallest peak in the Caribou National Forest.....2-92

|       |   |      |
|-------|---|------|
|       | Because the area contains Bonneville cutthroat trout .....  | 2-93 |
|       | Because it is a destination recreation area .....   | 2-93 |
|       | Because the area provides summer habitat for elk, mule deer,<br>and moose .....   | 2-93 |
|       | Because the area provides big game hunting opportunities.....   | 2-93 |
|       | Because it is one of the largest General Forest areas east of<br>Georgetown .....   | 2-93 |
|       | Because reclassification is consistent with the Forest Plan .....   | 2-93 |
| 2-186 | Public Concern: The Forest Service should reclassify the General<br>Forest acres in the Mount Naomi Roadless Area to<br>Backcountry/Restoration. ....   | 2-93 |
|       | To create a buffer between wilderness quality lands and non-<br>roadless lands.....   | 2-93 |
|       | Because the acres provide connections between mountain<br>ranges .....  | 2-93 |
|       | To protect big game hunting opportunities .....   | 2-94 |
|       | Because the area contains Bonneville cutthroat trout .....  | 2-94 |
|       | Because reclassification is consistent with the Forest Plan .....   | 2-94 |
| 2-187 | Public Concern: The Forest Service should reclassify the General<br>Forest acres in the Bonneville Peak Roadless Area to<br>Backcountry/Restoration. ....                                     | 2-94 |
|       | Because it is an intact Roadless Area and reclassification is<br>consistent with the rest of the Roadless Area .....  | 2-94 |
|       | Because the area is an important recreation center and provides<br>low-density motorized recreation along with large non-motorized<br>areas .....   | 2-94 |
|       | To protect big game hunting opportunities .....   | 2-94 |
|       | Because the acres provide crucial elk and mule deer summer<br>habitat .....   | 2-94 |
|       | Because reclassification is consistent with the Forest Plan .....   | 2-95 |
| 2-188 | Public Concern: The Forest Service should reclassify the General<br>Forest acres in the Gannett-Spring Peak Roadless Area to<br>Backcountry/ Restoration. ....                                | 2-95 |
|       | Because the acres are roadless and serve as a wildlife corridor<br>into Wyoming .....   | 2-95 |
|       | Because the acres contain Bonneville cutthroat trout .....  | 2-95 |
|       | To preserve big game hunting opportunities .....  | 2-95 |
|       | Because the acres contain low-density motorized trails.....   | 2-95 |
|       | Because the acres provide crucial elk, moose, and mule deer<br>summer habitat .....   | 2-95 |
|       | Because reclassification is consistent with the Forest Plan .....   | 2-95 |
| 2-189 | Public Concern: The Forest Service should reclassify the portion of<br>the Station Creek Roadless Area located east of Forest Road 406<br>from General Forest to Backcountry/Restoration..... | 2-96 |
|       | Because the Agency rates the natural integrity as high .....  | 2-96 |

Because the area is contiguous with the Bloomington Lakes  
Special Area ..... 2-96

Because the area provides crucial summer habitat for mule deer  
and elk ..... 2-96

Because the area contains Bonneville cutthroat trout ..... 2-96

Because the area is an important recreation area ..... 2-96

Because reclassification is consistent with the Forest Plan ..... 2-96

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. .... 2-96

    Because the Agency rates the natural integrity as high ..... 2-96

    Because the area contains Bonneville cutthroat trout ..... 2-96

    Because the area provides crucial summer range habitat for  
mule deer and elk ..... 2-97

    Because it is an important recreation area ..... 2-97

    Because reclassification is consistent with the Forest Plan ..... 2-97

2-191 Public Concern: The Forest Service should reclassify the Deep  
Creek Roadless Area from General Forest to  
Backcountry/Restoration. .... 2-97

    Because the area is an intact Roadless Area ..... 2-97

    Because the area provides big game hunting opportunities ..... 2-97

    Because the area contains Bonneville cutthroat trout ..... 2-97

    Because the area provides clean water ..... 2-97

    Because the area is a migration corridor ..... 2-97

    Because the area provides low-density motorized recreation  
opportunities ..... 2-98

    Because the area provides important range vegetation for big  
game species ..... 2-98

    Because the area provides crucial summer habitat for elk,  
moose, and mule deer ..... 2-98

    Because reclassification is consistent with the Forest Plan ..... 2-98

2-192 Public Concern: The Forest Service should reclassify the Soda  
Point Roadless Area from General Forest to  
Backcountry/Restoration. .... 2-98

    Because the area provides backcountry motorized recreation  
opportunities ..... 2-98

    Because the area is an important part of the Bear River Range ..... 2-98

    Because the area contains Bonneville cutthroat trout ..... 2-98

    Because the area provides crucial summer range habitat for  
mule deer and elk ..... 2-98

    Because reclassification is consistent with the Forest Plan ..... 2-99

2-193 Public Concern: The Forest Service should reclassify the Clarkston  
Mountain Roadless Area from General Forest to Backcountry/  
Restoration. .... 2-99

    Because the area is largely intact ..... 2-99

|       |   |       |
|-------|---|-------|
|       | To provide the same level of protection for the heart of the area as the perimeter .....  | 2-99  |
|       | Because the area provides big game hunting opportunities.....   | 2-99  |
|       | Because the area serves as an important migration route .....   | 2-99  |
|       | Because the area provides low-density motorized recreation opportunities .....  | 2-99  |
|       | To preserve big game hunting opportunities.....   | 2-99  |
|       | Because these areas provide important range vegetation for big game species.....  | 2-99  |
|       | Because reclassification is consistent with the Forest Plan .....   | 2-100 |
| 2-194 | Public Concern: The Forest Service should reclassify the Scout Mountain Roadless Area from General Forest to Backcountry/Restoration. ....  | 2-100 |
|       | Because the area is largely intact .....  | 2-100 |
|       | Because the area provides crucial summer range habitat for mule deer and elk.....   | 2-100 |
|       | Because the area is an important recreation area.....   | 2-100 |
|       | Because reclassification is consistent with the Forest Plan .....   | 2-100 |
| 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..... | 2-100 |
|       | Because the Agency rates the natural integrity as high .....  | 2-100 |
|       | Because the area provides valuable recreation opportunities.....  | 2-100 |
|       | 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 .....   | 2-101 |
|       | Because the area provides important fishing opportunities and big game habitat.....   | 2-101 |
|       | Because reclassification is consistent with the Forest Plan .....   | 2-101 |
| 2-196 | Public Concern: The Forest Service should reclassify the Pioneer Mountains Roadless Area from General Forest to Backcountry/Restoration. ....   | 2-101 |
|       | To provide a buffer to lands identified with wilderness qualities....   | 2-101 |
|       | Because it is an important recreation area.....   | 2-101 |
|       | Because the Agency rates the natural integrity as being high.....   | 2-101 |
|       | Because the area is vital habitat for elk, mule deer, bighorn sheep, and mountain goats.....  | 2-101 |
|       | Because the area provides quality trout fisheries.....  | 2-101 |
|       | To preserve the historic mining resources .....   | 2-102 |
|       | Because the area was proposed for Backcountry/Restoration in the State Petition.....  | 2-102 |
|       | Because reclassification is consistent with the Forest Plan .....   | 2-102 |
| 2-197 | Public Concern: The Forest Service should reclassify the Mount Harrison Roadless Area from General Forest to Backcountry/Restoration. ....  | 2-102 |

Because the area was proposed for Backcountry/Restoration in the state petition .....2-102

Because the area is an important water source for downstream uses .....2-102

Because the Mount Harrison Natural Area is within the boundary .....2-102

Because the area provides quality big game hunting and recreation opportunities .....2-102

Because the area provides high-quality recreation opportunities...2-102

Because reclassification is consistent with the Forest Plan .....2-103

2-198 Public Concern: The Forest Service should reclassify the Fifth Fork Rock Creek Roadless Area from General Forest to Backcountry/Restoration. ....2-103

    To maintain consistent management guidelines .....2-103

    Because the area contains the only known strong population of redband trout in the forest.....2-103

    Because the area provides summer and winter habitat for mule deer.....2-103

    Because the area provides solitude and big game hunting, fishing, and recreation opportunities .....2-103

    Because the area was proposed for Backcountry/Restoration in the state petition .....2-103

    Because reclassification is consistent with the Forest Plan .....2-103

2-199 Public Concern: The Forest Service should reclassify portions of the Mahogany Butte Roadless Area from General Forest to Backcountry/ Restoration. ....2-104

    Because these areas provide non-motorized big-game habitat ....2-104

    Because these areas were proposed for Backcountry/Restoration in the state petition .....2-104

    Because these areas have numerous springs .....2-104

    Because Phantom Falls is an important hiking destination .....2-104

    Because the area provides fish and big game habitat .....2-104

    Because reclassification is consistent with the Forest Plan .....2-105

2-200 Public Concern: The Forest Service should reclassify the Lone Cedar Roadless Area from General Forest to Backcountry/ Restoration. ....2-105

    Because the area was proposed for Backcountry/Restoration in the state petition .....2-105

    Because the area provides important fish and big game habitat, and hunting and recreation opportunities .....2-105

    Because this island of non-motorized use is important for big game habitat .....2-105

    Because reclassification is consistent with the Forest Plan .....2-105

2-201 Public Concern: The Forest Service should reclassify the Italian Peaks Roadless Area from General Forest to Backcountry/ Restoration. ....2-105



|  |       |
|--|-------|
| To provide an important buffer to BLM lands .....  | 2-105 |
| To limit impacts to hunting in Montana .....   | 2-106 |
| To preserve the natural integrity of the area .....  | 2-106 |
| Because the area includes elk, mule deer, bighorn sheep,<br>pronghorn, and mountain goat habitat .....   | 2-106 |
| Because the area supports wild trout fisheries.....  | 2-106 |
| To avoid adverse impacts on mule deer and mountain goats .....   | 2-106 |
| Because reclassification is consistent with the Forest Plan .....  | 2-106 |
| 2-202 Public Concern: The Forest Service should reclassify the Bear<br>Creek Roadless Area from General Forest to Backcountry/<br>Restoration. ....                                      | 2-106 |
| Because the southern boundary is contiguous with an area<br>classified as Primitive .....  | 2-106 |
| Because the area provides big game hunting opportunities and<br>supports Yellowstone cutthroat trout.....  | 2-106 |
| Because the area provides habitat for elk, mule deer, and<br>moose .....   | 2-107 |
| To prevent adverse impacts to elk and Yellowstone cutthroat<br>trout.....  | 2-107 |
| To protect elk, mule deer, and Yellowstone cutthroat trout<br>habitat .....  | 2-107 |
| Because reclassification is consistent with the Forest Plan .....  | 2-107 |
| 2-203 Public Concern: The Forest Service should reclassify the Diamond<br>Peak Roadless Area from General Forest to Backcountry/<br>Restoration. ....                                    | 2-107 |
| To provide an important buffer to BLM lands .....  | 2-107 |
| To avoid adverse impacts to elk, mule deer, bighorn sheep,<br>pronghorn, and mountain goat habitat .....   | 2-107 |
| Because the area provides opportunities for solitude .....   | 2-107 |
| Because the area is important for wildlife and hunting .....   | 2-108 |
| Because reclassification is consistent with the Forest Plan .....  | 2-108 |
| 2-204 Public Concern: The Forest Service should reclassify the Garfield<br>Mountain Roadless Area from General Forest to Backcountry/<br>Restoration. ....                               | 2-108 |
| Because the area is adjacent to a proposed Wilderness Area<br>and to avoid impacts on Montana hunting.....   | 2-108 |
| Because the area provides habitat for elk, mule deer, mountain<br>goat, and moose .....  | 2-108 |
| To avoid adverse impacts to elk and mule deer.....   | 2-108 |
| Because the area contains an important wild trout fishery .....  | 2-108 |
| Because the area provides an important linkage for wildlife .....  | 2-108 |
| Because reclassification is consistent with the Forest Plan .....  | 2-108 |
| 2-205 Public Concern: The Forest Service should reclassify portions of<br>the Italian Peaks and Garfield Mountain Roadless Areas from<br>General Forest to Backcountry/ Restoration..... | 2-109 |
| To protect roadless values and big game hunting opportunities ...  | 2-109 |

2-206 Public Concern: The Forest Service should reclassify portions of the Bald Mountain Roadless Area from General Forest to Backcountry/ Restoration. ....2-109

Because the area is unroaded and contiguous with areas designated as Backcountry/Restoration.....2-109

To avoid adverse impacts to elk, mule deer, moose, and Yellowstone cutthroat trout .....2-109

Because reclassification is consistent with the Forest Plan .....2-109

*General Forest to Primitive*..... 2-109

2-207 Public Concern: The Forest Service should reclassify the southeastern portion of Spring Creek Inventoried Roadless Area from General Forest to Primitive. ....2-109

Because the area is adjacent to an Inventoried Roadless Area categorized as Primitive.....2-109

Because the area includes elk and mule deer summer range habitat .....2-110

Because access should be limited to non-motorized uses.....2-110

Because reclassification is most consistent with the Forest Plan ..2-110

2-208 Public Concern: The Forest Service should reclassify the Red Mountain Roadless Area from General Forest to Primitive. ....2-110

Because of the high-quality backcountry values .....2-110

Because the area contains Bonneville cutthroat trout.....2-110

Because the area includes elk and mule deer summer range habitat .....2-110

Because this is most consistent with the Forest Plan .....2-110

2-209 Public Concern: The Forest Service should reclassify the Pioneer Mountains from General Forest to Primitive. ....2-110

To protect the primitive character of these areas and prohibit road building .....2-110

2-210 Public Concern: The Forest Service should reclassify Porcupine Creek, Upper Muldoon Creek, and Copper Creek from General Forest to Primitive. ....2-111

To maintain the current status .....2-111

2-211 Public Concern: The Forest Service should reclassify the Katka Peak from General Forest to Primitive. ....2-111

To protect them from timber harvest and preserve the scenic integrity .....2-111

2-212 Public Concern: The Forest Service should reclassify portions of the Toponce Roadless Area from General Forest to Primitive. ....2-111

Because it is an important recreation center.....2-111

Because the area has high backcountry values and is contiguous with other backcountry lands .....2-111

To preserve big game hunting opportunities.....2-111

because most of this Roadless Area is already designated as primitive .....2-112

|       |   |              |
|-------|---|--------------|
|       | Because the area provides crucial summer range habitat for elk, moose, and mule deer .....  | 2-112        |
|       | To provide consistency with the Forest Plan .....   | 2-112        |
| 2-213 | Public Concern: The Forest Service should reclassify portions of the Caribou City Roadless Area from General Forest to Primitive.....               | 2-112        |
|       | Because the area provides solitude .....  | 2-112        |
|       | Because the area is adjacent to recommended Wilderness Areas and to historic mining areas .....   | 2-112        |
|       | To maintain large landscape area habitat .....  | 2-112        |
|       | To provide a buffer between recommended Wilderness Areas and non-roadless forest .....  | 2-112        |
|       | To preserve deer, elk, and moose hunting opportunities .....  | 2-112        |
|       | Because it is a non-motorized use only area with high backcountry values .....  | 2-112        |
|       | Because the area provides summer range habitat for elk and mule deer .....  | 2-113        |
|       | To provide consistency with the Forest Plan .....   | 2-113        |
|       | <i>Backcountry/Restoration to Primitive .....</i>   | <i>2-113</i> |
| 2-214 | Public Concern: The Forest Service should reclassify the Backcountry/ Restoration areas in the Palisades Roadless Area as Primitive.....            | 2-113        |
|       | To benefit Yellowstone cutthroat trout.....   | 2-113        |
| 2-215 | Public Concern: The Forest Service should reclassify the Roman Nose area from Backcountry/Restoration to Primitive. ....                            | 2-113        |
| 2-216 | Public Concern: The Forest Service should reclassify the Rawhide Roadless Area from Backcountry/Restoration to Primitive. ....                      | 2-113        |
|       | Because of its proximity to proposed wilderness.....  | 2-113        |
| 2-217 | Public Concern: The Forest Service should reclassify the Meadow Creek-Upper North Fork Roadless Area from Backcountry/Restoration to Primitive..... | 2-113        |
|       | Because of its proximity to proposed wilderness.....  | 2-113        |
| 2-218 | Public Concern: The Forest Service should reclassify the Moose Mountain Roadless Area from Backcountry/Restoration to Primitive..                   | 2-114        |
|       | To be consistent with the Forest Plan .....   | 2-114        |
| 2-219 | Public Concern: The Forest Service should reclassify the Pot Mountain Roadless Area from Backcountry/Restoration to Primitive..                     | 2-114        |
|       | Because the area has highly erosive soils and steep terrain .....   | 2-114        |
| 2-220 | Public Concern: The Forest Service should reclassify the Mallard-Larkins Roadless Area from Backcountry/Restoration to Primitive.....               | 2-114        |
|       | To be consistent with Forest Plans .....  | 2-114        |
| 2-221 | Public Concern: The Forest Service should reclassify the portions of the Palisades Roadless Area from Backcountry/Restoration to Primitive.....     | 2-114        |
|       | Because the area is contiguous with Wild Lands Recreation and Wilderness Areas .....  | 2-114        |

Because the area supports mule deer, elk, moose, and big game hunting .....2-114

Because the area supports Yellowstone cutthroat trout.....2-114

Because the area provides solitude .....2-114

2-222 Public Concern: The Forest Service should reclassify the Selkirk Crest from Backcountry/Restoration to Primitive or Wild Land Recreation.....2-115

    To provide the protection these areas deserve .....2-115

*Backcountry/Restoration to General Forest*..... 2-115

2-223 Public Concern: The Forest Service should reclassify portions of the Mount Jefferson Roadless Areas from Backcountry/Restoration to General Forest. ....2-115

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    Because larger areas provide ecological resiliency and increased biodiversity ..... 4-16

    To decrease habitat fragmentation ..... 4-16

4-12 Public Concern: The Forest Service should ensure that Roadless Areas with habitat for Yellowstone cutthroat trout are protected. .... 4-16

    Because the species faces multiple challenges ..... 4-16

4-13 Public Concern: The Forest Service should limit timber harvesting and road construction..... 4-17

    Because more rigorous management would increase timber harvests ..... 4-17

4-14 Public Concern: The Forest Service should protect endangered ecosystems, regardless of their importance to extractive industries. .... 4-17

    Because sagebrush ecosystems are important ..... 4-17

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. .... 4-17

4-16 Public Concern: The Forest Service should consider designating Roadless Areas as wilderness areas. .... 4-17

    To protect them from timber harvest..... 4-17

4-17 Public Concern: The Forest Service should actively manage Roadless Areas..... 4-18

    To reduce forest fires..... 4-18

    To reduce forest fires and attendant global warming ..... 4-18

    Because it is a better use of taxpayer funds and would increase access..... 4-18

    Because most Roadless Areas are not actually roadless ..... 4-18

    To support the mule deer population ..... 4-19

    Because we should be using our resources rather than those of other countries ..... 4-19

|      |   |      |
|------|---|------|
| 4-18 | Public Concern: The Forest Service should preserve historic cabins on Roadless Areas.....   | 4-19 |
|      | MANAGEMENT OF NATIONAL FOREST LANDS.....  | 4-19 |
| 4-19 | Public Concern: The Forest Service should protect forest lands. ....  | 4-19 |
|      | To preserve biodiversity, clean water and air, and sustainable habitat .....  | 4-19 |
| 4-20 | Public Concern: The Forest Service should preserve wilderness lands.....  | 4-19 |
|      | Because they provide areas of peace, quiet, and spiritual renewal .....   | 4-19 |
| 4-21 | Public Concern: The Forest Service should protect farms and forests.....  | 4-20 |
|      | To preserve farmers and wildlife .....  | 4-20 |
| 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..... | 4-20 |
| 4-23 | Public Concern: The Forest Service should follow a multiple-use management strategy.....  | 4-20 |
|      | Because it is infeasible to prohibit all extractive activities or management practices.....   | 4-20 |
| 4-24 | Public Concern: The Forest Service should maintain access to National Forests for all users.....  | 4-20 |
| 4-25 | Public Concern: The Forest Service should actively manage National Forests. ....  | 4-21 |
|      | To protect wildlife and trees .....   | 4-21 |
|      | Because natural cycles can be extreme.....  | 4-21 |
|      | To reduce forest fires .....  | 4-21 |
| 4-26 | Public Concern: The Forest Service should acknowledge that active management is not realistic.....  | 4-21 |
|      | Because funding and personnel shortages restrict management actions.....  | 4-21 |
|      | BIOLOGICAL RESOURCES .....  | 4-22 |
| 4-27 | Public Concern: The Forest Service should provide adequate protections for biological diversity.....  | 4-22 |
|      | Including protection of sagebrush/aspen habitat.....  | 4-22 |
| 4-28 | Public Concern: The Forest Service should protect the sage-grouse and the sharp-tail grouse.....  | 4-22 |
|      | Because they are significant to the Shoshone and Bannock Tribal culture .....   | 4-22 |
| 4-29 | Public Concern: The Forest Service should protect riparian areas.....   | 4-23 |
|      | Because they support sustainable ecosystems .....   | 4-23 |
| 4-30 | Public Concern: The Forest Service should protect the Salmon and Clearwater Rivers.....   | 4-23 |
|      | To preserve Chinook salmon and steelhead trout fisheries .....  | 4-23 |
| 4-31 | Public Concern: The Forest Service should protect the Snake and Salmon River watersheds.....  | 4-23 |

To preserve the West Slope cutthroat trout .....4-23

FOREST FIRE AND FOREST HEALTH CONSIDERATIONS ..... 4-23

4-32 Public Concern: The Forest Service should use science-based forest management techniques. ....4-23

    To avoid catastrophic forest health problems .....4-23

4-33 Public Concern: The Forest Service should work to prevent forest fires. ....4-23

    Because of the adverse effect fires have on the local tourist-based economies.....4-23

    To protect air quality and human health.....4-23

    To protect wildlife populations, including special-status species, and rural economies ..... 4-24

4-34 Public Concern: The Forest Service should avoid the use of prescribed burns. ....4-24

    Because they often get out of control .....4-24

4-35 Public Concern: The Forest Service should facilitate the reduction of response times to deal with forest health issues. ....4-24

    Because response delays can exacerbate problems.....4-24

4-36 Public Concern: The Forest Service should focus fire prevention on the Wildland-Urban Interface.....4-24

    Because sufficient roads already exist.....4-24

4-37 Public Concern: The Forest Service should reduce fuel loads on Roadless Areas.....4-25

4-38 Public Concern: The Forest Service should consider impacts on special-status species habitat when deciding whether to allow wildfires in Roadless Areas. ....4-25

4-39 Public Concern: The Forest Service should be conservative in the application of fuel treatments to prevent forest fires. ....4-25

    Because high-density vegetation provides habitat and to support natural fire regimes .....4-25

4-40 Public Concern: The Forest Service should limit firefighting efforts. ....4-25

    Because natural fire regimes benefit wildlife.....4-25

4-41 Public Concern: The Forest Service should not support road construction for wildfire prevention.....4-25

    Because areas in the Wildland-Urban Interface already have sufficient road access .....4-25

    Because property owners should be responsible for their own fire protection and accept the risks of living in fire-prone areas .....4-26

4-42 Public Concern: The Forest Service should avoid protecting Ponderosa pine from forest fires. ....4-26

    Because this species is naturally resilient and benefits from forest fires .....4-26

4-43 Public Concern: The Forest Service should acknowledge the important role wildfire plays in creating healthy ecosystems.....4-26

|      |  |      |
|------|--|------|
| 4-44 | Public Concern: The Forest Service should consider road construction, mechanical treatments, and timber harvest in the Wildland-Urban Interface..... | 4-26 |
| 4-45 | Public Concern: The Forest Service should permit timber harvest for forest health based on risk potential.....                                       | 4-26 |
|      | Because the length of the permit process exacerbates the problems treatment is supposed to address .....   | 4-26 |
| 4-46 | Public Concern: The Forest Service should not use forest health as an excuse for timber harvest. ....  | 4-27 |
| 4-47 | Public Concern: The Forest Service should not support timber harvest for fuel reduction. ....  | 4-27 |
|      | Because timber harvest only increases fire risks .....   | 4-27 |
| 4-48 | Public Concern: The Forest Service should avoid leaving brush piles or burning them following thinning activities. ....                              | 4-27 |
|      | To avoid fire hazards and impacts on human health.....   | 4-27 |
| 4-49 | Public Concern: The Forest Service should actively manage beetle infestation. ....   | 4-27 |
|      | To address public concern about resulting tree mortality .....   | 4-27 |
|      | ROAD CONSTRUCTION CONSIDERATIONS.....  | 4-28 |
| 4-50 | Public Concern: The Forest Service should support temporary road construction. ....  | 4-28 |
|      | To address drought, fire, and insect infestations.....   | 4-28 |
| 4-51 | Public Concern: The Forest Service should not support road construction. ....  | 4-28 |
|      | Because roads fragment habitats and species populations, accelerate erosion rates, and promote invasive plant species .....                          | 4-28 |
|      | Because roads diminish the backcountry recreational values, ecological integrity, and roadless qualities of roadless areas.....                      | 4-28 |
|      | Because the Agency already has a maintenance backlog .....   | 4-28 |
|      | Because the Agency does not have the funds to police unauthorized use or maintain the existing roads .....   | 4-28 |
|      | Because roads act as vectors for invasive species .....  | 4-28 |
| 4-52 | Public Concern: The Forest Service should not allow construction of temporary roads. ....  | 4-28 |
|      | Because roads are not temporary or ecologically benign.....  | 4-28 |
|      | Because roads will exacerbate uncontrolled recreational access ...   | 4-29 |
|      | Because Temporary roads cause the same ecological harm as permanent ones .....   | 4-29 |
| 4-53 | Public Concern: The Forest Service should restrict truck traffic on National Forest roads. ....  | 4-29 |
|      | Because the trucks used for mining and logging operations cause erosion.....   | 4-29 |
| 4-54 | Public Concern: The Forest Service should limit the incursion of roads in the National Forests.....  | 4-29 |
|      | To reduce the spread of nonnative, invasive species.....   | 4-29 |
|      | Because roads increase habitat fragmentation .....   | 4-29 |

Because sometimes new roads are proposed simply to prevent future wilderness designation ..... 4-30

Because sustainable forestry can be practiced using existing roads..... 4-30

Because roads are vectors for human-related problems ..... 4-30

4-55 Public Concern: The Forest Service should acknowledge that even when roads are temporary, the impacts of constructing them are not. .... 4-30

4-56 Public Concern: The Forest Service should allow well-designed and administered roads in support of land management activities..... 4-30

4-57 Public Concern: The Forest Service should close all roads in the Council Mountain Roadless Area. .... 4-30

    To help bring back Boone and Crocket mule deer ..... 4-30

TIMBER HARVESTING CONSIDERATIONS ..... 4-31

4-58 Public Concern: The Forest Service should encourage increased levels of timber production. .... 4-31

    To reduce the impact of forest fires ..... 4-31

4-59 Public Concern: The Forest Service should not reduce the areas open to timber harvesting..... 4-31

    Because a reduction would effectively eliminate timber harvest and would negatively affect forest health ..... 4-31

4-60 Public Concern: The Forest Service should discourage timber production in National Forests..... 4-31

    Because timber harvesting will not reduce the threat of fire..... 4-31

    Because replanting practices do not stop erosion or provide sustenance to wildlife, and are minimally effective ..... 4-31

    Because timber harvesting exacerbates climate change ..... 4-31

    Because timber harvesting discourages tourism ..... 4-32

    Because timber sales do not compensate for the further loss of old-growth trees ..... 4-32

    Because increased timber harvesting is affecting the frequency and magnitude of floods..... 4-32

    Because Roadless Areas are unique and more valuable than timber revenue ..... 4-32

    Because of modern timber management practices, harvesting of wildlands is not needed..... 4-32

    Because our forests should not be harvested to supply other countries with timber ..... 4-32

    Because enough timber in the Western United States has already been harvested ..... 4-32

    Because trees create conditions for rainfall ..... 4-32

    Because lands managed for timber often create hazardous fire conditions and insect infestations ..... 4-33

    Because it is hypocritical to advocate conservation in other countries and not pursue it here ..... 4-33



|                             |   |      |
|-----------------------------|---|------|
| 4-61                        | Public Concern: The Forest Service should not permit commercial timber harvesting unless timber companies assist in forest cleanup. ... | 4-33 |
| 4-62                        | Public Concern: The Forest Service should support alternatives to timber harvesting, including tree farming and paper recycling.....    | 4-33 |
| 4-63                        | Public Concern: The Forest Service should require selective timber harvesting by helicopter in non-wilderness areas.....                | 4-33 |
|                             | To acquire high-quality wood while avoiding severe habitat destruction .....  | 4-33 |
| 4-64                        | Public Concern: The Forest Service should not construct roads for timber harvest.....   | 4-34 |
|                             | Because the Agency should not subsidize timber companies.....   | 4-34 |
|                             | Because existing roads cannot be maintained.....  | 4-34 |
|                             | Because what little Roadless Area remains should be set aside for wilderness study .....  | 4-34 |
| 4-65                        | Public Concern: The Forest Service should not allow timber harvesting above Little Salmon River. ....                                   | 4-34 |
|                             | Because of the steep slopes .....   | 4-34 |
| MINING CONSIDERATIONS ..... |   | 4-34 |
| 4-66                        | Public Concern: The Forest Service should not permit mining in Idaho Roadless Areas. ....   | 4-34 |
|                             | Because mining pollutes the water and negatively affects wildlife ..  | 4-34 |
|                             | Until the Mining Act is changed to protect American taxpayers .....   | 4-34 |
| 4-67                        | Public Concern: The Forest Service should not permit golf course development as remediation of mining land. ....                        | 4-35 |
|                             | Because wildlife needs large undisturbed habitat parcels.....   | 4-35 |
|                             | <i>Phosphate Mining</i> .....   | 4-35 |
| 4-68                        | Public Concern: The Forest Service should support phosphate production in Idaho.....  | 4-35 |
|                             | To support agriculture and food processing in the State.....  | 4-35 |
|                             | To avoid needing to import phosphate and to remain economically strong .....  | 4-35 |
|                             | To avoid needing to import phosphate and because mining companies are better stewards of the environment than they used to be .....     | 4-36 |
|                             | Because phosphate is a strategic mineral.....   | 4-36 |
|                             | Because concerns about selenium contamination are overblown...  | 4-36 |
| 4-69                        | Public Concern: The Forest Service should permit phosphate mining in the Caribou-Targhee National Forest.....                           | 4-36 |
|                             | To comply with the Mineral Leasing Act of 1920 .....  | 4-36 |
|                             | Because the current Forest Plan permits phosphate mining.....   | 4-36 |
|                             | Because the phosphate from the Caribou-Targhee is critical to agricultural production.....  | 4-37 |
| 4-70                        | Public Concern: The Forest Service should not open Roadless Areas to phosphate mining.....  | 4-37 |
|                             | Because pollution from phosphate mining places water, fish, and human health at risk.....   | 4-37 |

Because there are already 17 phosphate mining Superfund sites in Idaho..... 4-37

Because pollution from phosphate mining affects water, fish, and recreation..... 4-37

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..... 4-37

4-72 Public Concern: The Forest Service should reconsider permitting phosphate mining in the areas designated as Backcountry/Restoration..... 4-37

Because a large portion of the Caribou-Targhee Forest would be affected..... 4-37

4-73 Public Concern: The Forest Service should encourage sustainable, phosphate-free farming methods. .... 4-38

Because phosphate mining causes pollution ..... 4-38

*Oil and Gas Development* ..... 4-38

4-74 Public Concern: The Forest Service should not support oil and gas extraction on National Forests..... 4-38

Because of the environmental effects..... 4-38

Because taxpayers should not be subsidizing these companies ..... 4-38

*Alternative Energy* ..... 4-38

4-75 Public Concern: The Forest Service should make alternative energy exploration and development a priority. .... 4-38

Because alternative energy development is inevitable ..... 4-38

4-76 Public Concern: The Forest Service should look to science and technology for alternative energy solutions. .... 4-39

To avoid further environmental devastation ..... 4-39

4-77 Public Concern: The Forest Service should encourage development of geothermal energy..... 4-39

To benefit populations near areas with geothermal potential..... 4-39

4-78 Public Concern: The Forest Service should not encourage development of geothermal energy..... 4-39

Because it is irresponsible to offer Tribal and public resources for geothermal development ..... 4-39

Because exploration and development would have significant impacts ..... 4-39

Because development of geothermal power would negatively affect wildlife migration..... 4-39

Because development of geothermal power would conflict with Tribal rights ..... 4-39

Because the test drill sites have negative environmental impacts ... 4-40

Industrial Cleanup ..... 4-40

4-79 Public Concern: The Forest Service should hold mining and other industries accountable for failures on environmental protection and cleanup..... 4-40

|      |  |      |
|------|--|------|
|      | Because such industries have a disincentive to admit their failures due to regulation's effect on profits.....                                   | 4-40 |
| 4-80 | Public Concern: The Forest Service should require mining companies to clean up areas they have affected. ....                                    | 4-41 |
|      | Because they should not be granted further access until they have proven themselves good stewards.....   | 4-41 |
| 4-81 | Public Concern: The Forest Service should protect all Roadless Areas until mining companies have remediated areas already affected.....          | 4-41 |
|      | GRAZING CONSIDERATIONS.....  | 4-41 |
| 4-82 | Public Concern: The Forest Service should support grazing.....   | 4-41 |
|      | Because grazing is a cost-effective method to reduce grass fire fuels.....   | 4-41 |
| 4-83 | Public Concern: The Forest Service should eliminate rangeland. ....  | 4-42 |
|      | Because grazing is environmentally destructive.....  | 4-42 |
|      | RECREATION CONSIDERATIONS.....   | 4-42 |
| 4-84 | Public Concern: The Forest Service should keep existing trails and roads open to multiple uses.....  | 4-42 |
| 4-85 | Public Concern: The Forest Service should limit access to Roadless Areas to hikers.....  | 4-42 |
|      | To limit human interaction with sensitive wildlife species.....  | 4-42 |
| 4-86 | Public Concern: The Forest Service should preserve areas for non-motorized use.....  | 4-42 |
|      | To protect them from roads, noise, and off-road vehicle abuse.....   | 4-42 |
| 4-87 | Public Concern: The Forest Service should limit mountain biking. ....  | 4-43 |
|      | To reduce impacts on wildlife and other trail users.....   | 4-43 |
| 4-88 | Public Concern: The Forest Service should restrict motorized use in Roadless Areas.....  | 4-43 |
|      | To preserve Roadless Areas, ensure human safety, and reduce noise.....   | 4-43 |
| 4-89 | Public Concern: The Forest Service should maintain and enforce rules preventing all-terrain vehicles from creating new cross-country trails..... | 4-43 |
|      | To reduce the damage caused by these trails.....   | 4-43 |
| 4-90 | Public Concern: The Forest Service should not restrict motorized access. ....  | 4-43 |
|      | Because the restrictions would negatively impact local businesses.....   | 4-43 |
| 4-91 | Public Concern: The Forest Service should revise the process for identifying motorized access trails and roads.....                              | 4-44 |
|      | Because the current process discriminates against motorized users.....   | 4-44 |
| 4-92 | Public Concern: The Forest Service should consider motorcycles and mountain bikes compatible uses.....   | 4-44 |
| 4-93 | Public Concern: The Forest Service should promote the development and use of quiet motorized vehicles.....                                       | 4-44 |

To avoid road closures based on noise .....4-44

4-94 Public Concern: The Forest Service should create a Motorized  
Access and Recreation Mitigation Bank.....4-45

To mitigate lost motorized access opportunities .....4-45

4-95 Public Concern: The Forest Service should support hunting in  
Idaho.....4-45

Because hunting contributes to the economy .....4-45

4-96 Public Concern: The Forest Service should preserve all  
preestablished airstrips in Wilderness areas.....4-45

To provide access.....4-45

4-97 Public Concern: The Forest Service should revoke all recreational  
user fees. ....4-45

Because it is double taxation .....4-45

Air Quality Considerations.....4-46

4-98 Public Concern: The Forest Service should increase monitoring of  
air pollutants.....4-46

To assess the health impacts of wildfires.....4-46

Social and Economic Considerations.....4-46

4-99 Public Concern: The Forest Service should open more areas for  
logging and motorized recreation. ....4-46

To support the Idaho economy .....4-46

4-100 Public Concern: The Forest Service should support employers that  
are not part of the extractive industries. ....4-46

To provide high-paying jobs without damaging the environment ....4-46

4-101 Public Concern: The Forest Service should not support extractive  
industries.....4-46

Because jobs in the extractive industries are short term and  
result in long-term consequences for local communities.....4-46

4-102 Public Concern: The Forest Service should not allow below-cost  
road construction.....4-47

Because it is fiscally irresponsible .....4-47

4-103 Public Concern: The Forest Service should not develop the forests  
for economic benefits. ....4-47

Because such development would reduce the quality of life for  
local communities .....4-47

Because recreation provides more benefits to the local economy ...4-47

Because recreation-based tourism is more sustainable .....4-47

4-104 Public Concern: The Forest Service should promote sustainable  
forest stewardship. ....4-47

To provide steady, long-term timber harvesting jobs .....4-47

4-105 Public Concern: The Forest Service should rectify mismanagement  
of roads. ....4-47

Because crumbling roads are harming wildlife.....4-47

4-106 Public Concern: The Forest Service should manage resource  
extraction wisely. ....4-48

To avoid fragmentation of the forest .....4-48

|   |      |
|---|------|
| 4-107 Public Concern: The Forest Service should not support the timber industry.....  | 4-48 |
| 4-108 Public Concern: The Forest Service should not support extractive uses.....  | 4-48 |
| Because companies should be required to clean up the areas they have already polluted .....   | 4-48 |
| 4-109 Public Concern: The Forest Service should close Roadless Areas to all business interests except for livestock grazing. ....       | 4-48 |
| 4-110 Public Concern: The Forest Service should not open Idaho Roadless Areas to commercial use. ....                                   | 4-48 |
| Because they support recreation, fish and wildlife, and special-status species .....  | 4-48 |
| To protect the peace and quiet they provide residents and visitors.....   | 4-48 |
| 4-111 Public Concern: The Forest Service should protect Idaho’s Roadless Areas from resource extraction and commercial development..... | 4-48 |
| Because Roadless Areas generate significant revenues from hunting and fishing licenses .....  | 4-48 |
| Because Roadless Areas support world-class recreational fishing.....  | 4-49 |
| 4-112 Public Concern: The Forest Service should limit the pace of extraction of natural resources. ....                                 | 4-49 |
| To preserve them for future generations .....   | 4-49 |
| 4-113 Public Concern: The Forest Service should not allow extractive uses.....  | 4-49 |
| To protect the scientific value and potential for biomimicry solutions.....   | 4-49 |
| Because the benefits of these uses are short term, whereas the benefits of pristine wilderness are long lasting .....                   | 4-49 |
| ENERGY CONSIDERATIONS.....  | 4-50 |
| 4-114 Public Concern: The Forest Service should support alternative forms of energy and building materials.....                         | 4-50 |
| Because timber harvesting and mining deplete resources and destroy the land.....  | 4-50 |
| 4-115 Public Concern: The Forest Service should support environmentally sensitive timber, gas, and oil extraction.....                  | 4-50 |

# Appendix D

## Demographics

### Introduction

Demographic analysis presents an overall picture of respondents: where they live, their general affiliation to various organizations or government agencies, and the manner in which they respond. The comment database contains public comment organized under subject categories (see Appendix B) and demographic information. This kind of database can be used to isolate specific combinations of information about public comment. For example, a report can show public comment from certain geographic locations or show comments associated with certain types of organizations. Thus demographic coding, combined with comment coding, allows decision-makers to use the database to focus on specific areas of public concern linked to geographic area, organizational affiliation, and response format.

The total number of responses to the National Forest System Lands in Idaho Draft Environmental Impact Statement is as follows:

8,698 original responses (8,707 respondents)  
130,420 organized campaign responses  
139,118 total responses

The demographic analysis presented in this appendix is based on the 8,698 original responses. *Original responses* include unique letters, forms with additional unique material that is not redundant to the comments in the form, and one copy of each form (i.e., a form master that is coded to ensure that the form material is included in the comment database).

Several categories are identified for demographic purposes. *Responses* are the individual letters, postcards, emails, etc., that were received. *Respondents* are the individual response writers. *Signatures* refer to the people who signed these individual responses. The number of signatures may be greater than the number of responses as there may be more than one signature per response. Likewise, the number of total responses may be larger than the number of total respondents due to multiple submissions by the same respondents. Form letters are counted and the total number of each form received can be found in Appendix E. Demographic information for form letter respondents is not recorded.

### Geographic Representation

Geographic representation was tracked for each original response. Table D-1 displays, by origin, the number of responses and signatures. Responses were received from 50 States. Note that 546 responses did not indicate geographic information and that 53 responses originated from an area not within a U.S. State or territory.

Table D-1. Number of Respondents and Signatures by Origin

| Origin               | Number of Respondents | Number of Signatures |
|----------------------|-----------------------|----------------------|
| Alabama              | 43                    | 43                   |
| Alaska               | 21                    | 21                   |
| Arizona              | 118                   | 122                  |
| Arkansas             | 19                    | 20                   |
| California           | 764                   | 783                  |
| Colorado             | 448                   | 477                  |
| Connecticut          | 55                    | 55                   |
| Delaware             | 15                    | 16                   |
| District of Columbia | 27                    | 37                   |
| Florida              | 210                   | 215                  |
| Georgia              | 93                    | 103                  |
| Hawaii               | 24                    | 25                   |
| Idaho                | 1,031                 | 1,113                |
| Illinois             | 194                   | 201                  |
| Indiana              | 72                    | 73                   |
| Iowa                 | 42                    | 44                   |
| Kansas               | 29                    | 29                   |
| Kentucky             | 43                    | 44                   |
| Louisiana            | 29                    | 29                   |
| Maine                | 38                    | 40                   |
| Maryland             | 82                    | 84                   |
| Massachusetts        | 121                   | 124                  |
| Michigan             | 145                   | 152                  |
| Minnesota            | 215                   | 227                  |
| Mississippi          | 9                     | 9                    |
| Missouri             | 69                    | 72                   |
| Montana              | 139                   | 149                  |
| Nebraska             | 18                    | 19                   |
| Nevada               | 38                    | 39                   |
| New Hampshire        | 31                    | 31                   |
| New Jersey           | 96                    | 99                   |
| New Mexico           | 67                    | 73                   |
| New York             | 292                   | 297                  |
| North Carolina       | 158                   | 165                  |
| North Dakota         | 6                     | 6                    |
| Ohio                 | 156                   | 162                  |
| Oklahoma             | 26                    | 26                   |
| Oregon               | 619                   | 655                  |
| Pennsylvania         | 199                   | 203                  |
| Puerto Rico          | 3                     | 3                    |
| Rhode Island         | 17                    | 17                   |
| South Carolina       | 32                    | 33                   |
| South Dakota         | 11                    | 11                   |
| Tennessee            | 74                    | 76                   |
| Texas                | 179                   | 183                  |
| Utah                 | 101                   | 103                  |
| Vermont              | 23                    | 26                   |
| Virginia             | 155                   | 159                  |
| Washington           | 1,082                 | 1,152                |
| West Virginia        | 18                    | 18                   |
| Wisconsin            | 499                   | 528                  |
| Wyoming              | 95                    | 101                  |
| Armed Forces Pacific | 2                     | 2                    |
| Origin not Supplied  | 546                   | 584                  |
| Foreign Countries    | 53                    | 53                   |

| Origin                                | Number of Respondents | Number of Signatures |
|---------------------------------------|-----------------------|----------------------|
| Response submitted by Multiple States | 16                    | 16                   |
| <b>Total</b>                          | <b>8,707</b>          | <b>9,147</b>         |

## Organizational Affiliation

Organizational affiliation was tracked for each original response. Table D-2 displays, by organization type, the number of responses and signatures.

**Table D-2. Number of Respondents and Signatures by Organization Type**

| Organization Type   | Number of Respondents | Number of Signatures |
|---|-----------------------|----------------------|
| Academic  | 1                     | 1                    |
| Agency Employee   | 1                     | 1                    |
| Agriculture Industry or Association                       | 1                     | 1                    |
| Business  | 8                     | 8                    |
| Civic Group   | 1                     | 1                    |
| Consultant/Legal Representatives                          | 1                     | 1                    |
| County Government Agency/Elected Official                 | 7                     | 13                   |
| Domestic Livestock Industry                               | 1                     | 1                    |
| Federal Agency/Elected Official                           | 3                     | 3                    |
| Government Employee/Union                                 | 3                     | 3                    |
| Individual  | 8,565                 | 8,986                |
| Mining Industry/Association                               | 3                     | 3                    |
| Motorized Recreation                                      | 7                     | 7                    |
| Multiple Use or Lands Rights Organization                 | 2                     | 3                    |
| Non-motorized/Non-mechanized Recreation                   | 2                     | 2                    |
| Oil, Natural Gas, Coal or Pipeline Industry               | 2                     | 2                    |
| Other or Unidentified Organization                        | 1                     | 1                    |
| Place-based Group   | 2                     | 3                    |
| Preservation/Conservation                                 | 44                    | 55                   |
| Professional Society                                      | 1                     | 1                    |
| Recreation/Conservation Organization                      | 30                    | 30                   |
| Recreational  | 3                     | 3                    |
| Regional/Other governmental Agency (multi-jurisdictional) | 1                     | 1                    |
| Special Use Permittee                                     | 3                     | 3                    |
| State Government Agency/Elected Official/Association      | 1                     | 1                    |
| Timber or Wood Products Industry or Association           | 4                     | 4                    |
| Town/City Government Agency/Elected Official/Association  | 3                     | 3                    |
| Tribal Government/Elected Official/Agency                 | 5                     | 5                    |



| Organization Type                                  | Number of Respondents | Number of Signatures |
|--|-----------------------|----------------------|
| Tribal Non-governmental Organization/Tribal member | 1                     | 1                    |
| <b>Total</b>                                       | <b>8,707</b>          | <b>9,147</b>         |

## Response Type

Table D-3 displays, by response format, the number of original responses/respondents and signatures.

**Table D-3. Number of Responses and Signatures by Response Type**

| Response Type # | Response Type                       | Number of Responses | Number of Signatures |
|-----------------|-------------------------------------|---------------------|----------------------|
| 1               | Letter                              | 4,167               | 4,455                |
| 2               | Form/Letter Generator               | 22                  | 22                   |
| 5               | Transcript                          | 158                 | 160                  |
| 6               | Form Plus                           | 4,329               | 4,488                |
| 8               | Public Meeting/workshop group notes | 22                  | 22                   |
| <b>Total</b>    |                                     | <b>8,698</b>        | <b>9,147</b>         |

## Delivery Type

Table D-4 presents the delivery types for each original response received on the project. Responses were received by email, fax, and mail.

**Table D-4. Number of Responses and Signatures by Delivery Type**

| Delivery Type Code | Delivery Type              | Number of Responses | Number of Signatures |
|--------------------|----------------------------|---------------------|----------------------|
| E                  | Email                      | 4,093               | 4,213                |
| F                  | Facsimile                  | 9                   | 12                   |
| M                  | Mail or commercial carrier | 4586                | 4912                 |
| U                  | Unknown                    | 1                   | 1                    |
| W                  | Web-based submission       | 9                   | 9                    |
| <b>Total</b>       |                            | <b>8,698</b>        | <b>9,147</b>         |

## Comment Period Extension

Table D-5 displays the number of original responses/respondents and signatures requesting a comment period extension.

**Table D-5. Number of Responses and Signatures  
by Request for Comment Period Extension**

| Common Period Extension                     | Number of Responses | Number of Signatures |
|---|---------------------|----------------------|
| No specific time mentioned or other         | 5                   | 6                    |
| Request for 15-day comment period extension | 1                   | 1                    |
| <b>Total</b>                                | <b>6</b>            | <b>7</b>             |

# Appendix E

## Organized Response Report

Organized responses, or “form letters,” represent 130,420 of the total responses received during the public comment period addressing the National Forest System Lands in Idaho Draft Environmental Impact Statement. Five or more responses received from different individuals but containing identical text, or identical text plus brief additional comments similar in content, are defined as organized response campaigns.

### Organized Response Campaigns

Once an organized response campaign letter is identified, a “master” is entered into the database with all of the content information. All “form plus” responses with matching text are then linked to this master within the database with a designated number. If a response includes additional text that is not redundant to the content of the form, it is entered as an individual letter. Identical responses from four or fewer respondents are also entered as individual letters.

Organized responses are identified with a number. Table E-1 presents the total number received of each organized response campaign letter and summarizes the concerns found therein.

**Table E-1. Organized Response Campaigns**

| Organized Response Campaign Letter Number | Total Received | Summary of Organized Response Campaign Letter  |
|---|----------------|--|
| 1   | 784            | Supports management of all NFS and Idaho roadless areas in accordance with the 2001 Roadless Area Conservation Rule. States that Idaho’s roadless areas are important because the State has the most roadless area acreage in the continental U.S. and because these areas are the “last place where all native plants, fish, and wildlife from the smallest plant to the largest predator can be found”. Stresses the need for pristine wild lands for recreational solitude and areas to escape the noise and crowds of everyday life. Also states these are public lands and should be managed in accordance with the public will.  |
| 2   | 5,433          | Supports management of all NFS and Idaho roadless areas in accordance with the 2001 Roadless Area Conservation Rule. States that Idaho’s roadless areas are important because the State has the most roadless area acreage in the continental U.S. and because these areas are the “last place where a full complement of native plants, fish, and wildlife, from the smallest plant to the largest predator can still be found”. Stresses the need for pristine wild lands, for recreational solitude and areas to escape the noise and crowds of everyday life. Also states that these are public lands owned by Americans and should be managed in accordance with the public will. |
| 3   | 18             | Supports protection of the Idaho roadless areas in accordance with the 2001 Roadless Area Conservation Rule. Suggests leaving Idaho forests unroaded and in a natural state for future generations.  |
| 4   | 292            | Supports protection of all roadless areas in Idaho in accordance with the publicly popular 2001 Roadless Area Conservation Rule, stating that the current rule already provides extensive protection for communities at-risk for wildland  |

| Organized Response Campaign Letter Number | Total Received | Summary of Organized Response Campaign Letter   |
|---|----------------|---|
|   |                | fire and forest health concerns, and provides beneficial effects to animals and habitats. States that the petition already placed too much financial burden on the taxpayers, with over \$660 million in backlog road maintenance. Also states that the financial benefit of recreational tourism is largely ignored in the petition. Emphasizes that these undeveloped Idaho forests are not county public lands or Idaho State public lands, but rather American public lands and should be managed for the long-term good of the nation.   |
| 5   | 5              | States that they do not support the 2007 Roadless Initiative for Idaho, as it would make over 9.3 million acres of public land unavailable for motorized use. Would like to maintain access to roadless areas in Idaho to preserve access to roads and sites for recreational motorized use for future generations. Asserts that the Idaho economy will suffer due to lost jobs and businesses in the logging industry, tourism, and motorized recreational. Also states that forest health would decline if logging is not allowed to continue in the Idaho forests.   |
| 6   | 203            | Supports management of all NFS and Idaho roadless areas in accordance with the 2001 Roadless Area Conservation Rule. States that Idaho's roadless areas are important because the State has the most roadless area acreage in the continental U.S. and because this area is the "last place where a full complement of native plants, fish, and wildlife, from the smallest plant to the largest predator can still be found". Stresses the need for pristine wild lands for recreational solitude and areas to escape the noise and crowds of everyday life. Also states these are public lands owned by Americans and should be managed in accordance with the public will.                               |
| 7   | 21,280         | States that management of the Idaho roadless forests should be in accordance with the 2001 Roadless Area Conservation Rule. Also states that Ex-Governor Jim Risch's petition to the Forest Service to allow development in Idaho forests is unwelcome by the majority of Idaho citizens. Emphasizes that, with an increase in global warming and a growing population, industrial development of forest lands does not make "environmental or practical sense" and is unacceptable. Stresses that these forest lands are not only important to wildlife, but they also "provide our nation with opportunities for outdoor recreation, hunting, and fishing".   |
| 8   | 4,191          | Supports management of all Idaho roadless areas in accordance with the 2001 Roadless Area Conservation Rule. States that Idaho's roadless area are important because the State has the most roadless area acreage in the continental U.S. and because this area is the "last place where all of the native plants, fish, and wildlife, from the smallest plant to the largest predator can still be found". Stresses the need for pristine wild lands for recreational solitude and areas to escape the noise and crowds of everyday life.  |
| 9   | 81             | Supports management of all NFS and Idaho roadless areas in accordance with the 2001 Roadless Area Conservation Rule. States that Idaho's roadless areas are important because the State has the most roadless area acreage in the continental U.S. and because this area is the "last place where all of the native plants, fish, and wildlife can be found". Stresses the need for pristine wild lands for recreational solitude and areas to escape the noise and crowds of everyday life, as well as recreational opportunities such as hunting and fishing in unspoiled wild areas. Also states these are public lands owned by all Americans and should be managed in accordance with the public will. |
| 10  | 105            | Supports management of all NFS and Idaho roadless areas in accordance with the 2001 Roadless Area Conservation Rule. States that Idaho's roadless areas are important because the State has the most roadless area acreage in the continental U.S. and because this area is the "last place where all of the native   |

| Organized Response Campaign Letter Number | Total Received | Summary of Organized Response Campaign Letter   |
|---|----------------|---|
|   |                | plants, fish, and wildlife can still be found". Stresses the need for pristine wild lands for recreational solitude and areas to escape the noise and crowds of everyday life, as well as recreational opportunities such as hunting and fishing in unspoiled wild areas. Also states these are public lands owned by Americans and should be managed in accordance with the public will.   |
| 11  | 35,116         | Supports management of all NFS and Idaho roadless areas in accordance with the 2001 Roadless Area Conservation Rule. States that Idaho's roadless areas are important because the State has the most roadless area acreage in the continental U.S. and because this area is the "last place where all of the native plants, fish, and wildlife, from the smallest plant to the largest predator can still be found". Also states these are public lands owned by Americans and should be managed in accordance with the public will. Stresses that the 2001 Roadless Area Conservation Rule was "the result of almost three years of deliberation that included 600 public hearings and more than 1.5 million written comments".  |
| 12  | 121            | Supports protecting "all Idaho Roadless Areas consistent with the 2001 Rule".   |
| 13  | 8              | Supports protecting the roadless character of Idaho and Montana roadless areas because of their impacts on the regional economy. Emphasizes, as Missoula County, Montana business owners, that their proximity to the National Forests in Idaho directly affects their success as "Main Street retailers to our backcountry outfitters and guides". States that wildlife-related tourism and outdoor recreation is the driving force for many local communities both in Montana and in Idaho. Also states that roadless areas in Idaho provide critical habitat for native fish and wildlife species and safeguard forest headwaters and streams, which provide drinking water for millions of Americans.   |
| 14  | 21,117         | Supports management of all NFS and Idaho roadless areas in accordance with the 2001 Roadless Area Conservation Rule and would like the adoption of Alternative A, No Action. Emphasizes that this Idaho Petition affords less protection against industrial development and logging than the 2001 Roadless Area Conservation Rule. States that Idaho's roadless areas are important because the State has the most roadless area acreage in the continental U.S. Stresses the need for pristine wild lands for future generations and that these landscapes are part of our national legacy and are a national treasure.  |
| 15  | 30,487         | Supports the protections already afforded by the 2001 Roadless Area Conservation Rule and would like these protections applied to all roadless areas across the country, as these areas are the best habitat for fish and wildlife. Concerned that rampant logging, road-building, and oil and gas development will lead to environmental degradation and that phosphate mining will worsen the already serious issue of selenium poisoning.  |
| 16  | 1,099          | Supports management of all Idaho roadless areas in accordance with the 2001 Roadless Area Conservation Rule. States that Idaho's roadless areas are important because the State has the most roadless area acreage in the continental U.S. One of particular importance is the Greater Yellowstone Ecosystem, with the "largest block of relatively undisturbed plant and animal habitat in the contiguous United States". States that they are concerned about industrial development in the form of mining, logging, and potential oil and gas development that will cause environmental degradation if the proposed Idaho Roadless Rule goes forward. Suggests that roadless characteristics will be compromised with the proposed rule, despite assurances from State and Federal officials that it will not negatively affect the environment. Also states that the Idaho national forests are owned by all Americans and should be managed accordingly. |

| Organized Response Campaign Letter Number | Total Received | Summary of Organized Response Campaign Letter   |
|---|----------------|---|
| 17  | 9,155          | Supports management of all NFS and Idaho roadless areas in accordance with the 2001 Roadless Area Conservation Rule. States that Idaho's roadless areas are important because the State has the most roadless area acreage in the continental U.S. and because this area is the "last place where all of the native plants, fish, and wildlife, from the smallest plant to the largest predator can still be found". Suggests that industrial development activities such as logging, mining, and road construction have irreversible impacts on wildlife habitat, water supplies, and recreational opportunities. Also states these are public lands owned by all Americans and should be managed as a national treasure for future generations.   |
| 18  | 399            | Supports protecting all of America's last wild and roadless forests consistent with the 2001 Roadless Area Conservation Rule.   |
| 19  | 153            | <p>States that as a sportsman, thinks that the proposed roadless rule sets good standards in regards to the backcountry management of some of Idaho's finest hunting and fishing resources. Suggests general improvements to the proposed rule in three areas:</p> <ul style="list-style-type: none"> <li>• Reevaluate guidelines for specific Backcountry Areas,</li> <li>• Strengthen Management Guidelines for General Forest Category, and</li> <li>• Maintain Salmon and Steelhead Fishing.</li> </ul> <p>Suggests that certain forests currently designated under General Forest management theme should be changed to Backcountry/Restoration, due to their very high wildlife and/or fisheries value. Also suggests that the majority of areas proposed for General Forest management could be afforded better protection and stronger guidelines under their already existing local Forest Plans, as opposed to the Idaho DEIS. However, the Idaho Roadless Rule should strengthen guidelines for General Forest management to make them more compatible with Forest Plans already in place. Finally, suggests that Chinook salmon and steelhead trout fishing are very important for anglers in the Clearwater and Salmon River watersheds, and these areas should remain in Backcountry/Restoration to support those anadromous fish habitats.</p> |
| 20  | 328            | Supports management of all NFS and Idaho roadless areas in accordance with the 2001 Roadless Area Conservation Rule, and the American public is opposed to proposals that weaken or reverse it. Emphasizes that government management that eliminates or degrades the natural character of the backcountry areas of Idaho directly affects "human-powered" outdoor recreational activities such as, climbing, hiking, biking, paddling, and skiing. States that new road should not be constructed in backcountry areas for the purposes of forest health, especially with a already increasing backlog of road maintenance burdening the Forest Service. Concerned that limitations set for the in the proposed rule for mineral leasing and road building are insufficient and the result will degrade the recreational value roadless areas. Disagrees with proposed mechanism for administrative corrections and modifications to Roadless Areas to accommodate future adjustments. States that the proposed rule allows for "incremental administrative elimination of protections on roadless areas".   |
| 21  | 26             | Supports management of all NFS and Idaho roadless areas in accordance with the 2001 Roadless Area Conservation Rule. States these are public lands owned by Americans and are part of our natural heritage and should be managed in accordance with the public will. Emphasizes that Idaho's roadless areas are important because the State has the most roadless area acreage in   |

| Organized Response Campaign Letter Number | Total Received | Summary of Organized Response Campaign Letter  |
|---|----------------|--|
|   |                | <p>the continental U.S. and these areas are the last place in the contiguous United States where nearly all of the wildlife species that characterize the region can still be found. Requests that the comment period be extended to 90 days because a 30-day comment period is insufficient for such nationally significant lands. Also requests that public hearings be held throughout the country. Suggests that the impacts of industrial development, logging, and road construction be fully considered on endangered, threatened and rare wildlife species, opportunities for remote recreation and solitude, and water quality.</p>   |
| 22  | 19             | <p>Supports the State of Idaho plan for inventoried roadless areas. Stresses that it this is not a "one plan fits all" and takes into account individual forest conditions for each National Forest. States that the proposed rule:</p> <ul style="list-style-type: none"> <li>• Is consistent with Federal laws for individual Forest Plans;</li> <li>• Provides additional options for management of National Forests in Idaho, reducing fire risk and promoting forest health;</li> <li>• Allows existing uses, such as phosphate mining, to continue, and clarifies access to phosphate ore in the roadless areas;</li> <li>• Is in the best interests of the country, as Forest Plans should utilize all forest resources.</li> </ul> <p>Also states that Forest Plans should include any outdoor recreation, firewood access, hunting and fishing.</p> |

## Appendix F

### Public Meeting Opening Address by Governor Risch, January 14, 2008

### Public Meeting to Receive Comments on Proposed Rule for Management of Roadless areas on National Forest System Lands in the State of Idaho

Held by Forest Service, USDA, January 14, 2008, at the United States Department of Agriculture, South Building, Jefferson Auditorium, 1400 Independence Avenue, SW., Washington, DC.

**MODERATOR:** I am Bill Supulski. I'm the National Roadless Coordinator for the U.S. Forest Service. Tonight we have two parts to our meeting. The first part is, we're going to have a short presentation that's been put together by the project team leader, Brad Gilbert, and assistant from the state, Tom Perry, works in the governor's office. We also have some remarks from both the regional forester for Region One, Tom Tidwell, and from Lieutenant Governor Risch who submitted the petition.

One other person I'd like to identify in the room. Harv, can I get you to wave your hand? The new regional forester at Region Four, which is in the southern half of Idaho, is Harv Forsgren. So he's here to listen also.

So with no further ado for that, I do need to ask a couple things. One, we do have some signers down here for people hearing-impaired if you need that assistance. If not, we'd like for them to be able to go home earlier.

With that, Tom has some remarks.

**MR. TOM TIDWELL:** Well, first of all, thank you for coming out tonight. I just have a few remarks because we're here to hear from you tonight. I don't think you came here to necessarily hear from me. But I would like to welcome you to the first public meeting in our state-specific Roadless Rule. I feel privileged to have the opportunity to open this meeting and to be able to introduce the lieutenant governor of Idaho James Risch in a couple minutes.

But first of all, I just wanted to reflect a little bit on why we're here. One of the similarities I'd like to share with you is that as we look at the evolution of wilderness legislation, reflect back that most of the early acts were on a national basis and then gradually over time we moved to more of a state-by-state approach to be able to continue to have success.

With roadless areas, we developed a national rule that provide management direction to every roadless area in this country, but with significant controversy and challenges that still exist today.

We now have an opportunity to improve on that through a state-by-state approach, that hopefully will allow us to resolve some of that controversy. I am gratified by the partnership we've established with the state of Idaho. Idaho is one of the states that was challenging the Roadless Rule. Now they're taking the lead in creating a state-specific rule, and we are working side by



side. The Forest Service is working side by side to develop a rule that integrates the national values of roadless areas with the local values of roadless areas.

I'm also pleased that the state, working with the county commissioners, found that the forest plans to be a good starting point for their petition. These forest plans were developed with extensive public involvement, probably with many of you. So the purpose of this rule is to consider the unique characteristics of each of Idaho's inventory roadless areas and balance the undeveloped character and the natural beauty of these areas with responsible stewardship.

I think one of the advantages of a state-specific rule is, it allows for greater collaboration with those having a strong interest in the conservation and management of inventory roadless areas and also to ensure balanced management decisions that will maintain the most important characteristics of these areas.

One of the things I want to stress with this rule: it's a draft rule, it's a proposed rule. And under the proposed rule, it does have some prohibitions. It also has some limited permissions, some exceptions. And those are to allow us to consider management activities and on a limited basis in roadless areas. And I want to stress that this rule in itself does not permit any of those activities. Any activities that would be proposed would have to go through our NEPA analysis, and there would be site-specific analysis and opportunity for public comment. But I just wanted to stress that point because I think it's a key part of this rule, and we need to remember that as we go forward.

Now in welcoming the lieutenant governor to our meeting, I want to reflect a little bit on the long history of partnership between the Forest Service and the governors of Idaho. Historically, governors have worked with the Forest Service in protecting wildlands in Idaho, going back to Governor Baldrige that was instrumental in creating the Idaho primitive area which later became the Frank Church Wilderness Area. And then more recently Governor Andrews was instrumental in the creation of the River of No Return Wilderness Area. And so continuing with this tradition of protecting Idaho's most important wildlands is Lieutenant Governor Risch. He has some remarks to share with you regarding his vision for roadless areas in Idaho, so would you please join me in welcoming Lieutenant Governor Risch?

[Applause.]

**LIEUTENANT GOV. JAMES E. RISCH:** Well, thank you very much. I appreciate that introduction, and I also appreciate you talking a little bit about the history, the governors of our state, working with the United States government. I had the honor and privilege of serving as Idaho's 31st governor, and when I was inaugurated as Idaho's 31st governor one of the things that was just in its inception was the consideration of the roadless areas in Idaho.

For those of you who haven't had the good fortune of visiting the state of Idaho, I'll tell you that two-thirds of the state of Idaho is owned by the federal government; two out of every three acres belongs to the United States of America. And it is truly a majestic state. It contains lands that are some of the most beautiful, the most magnificent, the most pristine areas that exist in the United States of America. We have the largest block of wilderness land outside of Alaska.

And Vickie and I, my wife, have had the privilege of living there all of our married life. And she's with me tonight. We've been married 39 years, and we've raised our three sons in the state of Idaho—hiking, camping, fishing, and hunting on some of the lands that we're talking about here tonight.

My formal education was in forest management, and so when I took the oath of office as governor and said that I would do the job, do the things required of me as governor to the best of my ability, I had specifically in mind the management of Idaho's lands; and specifically I had in mind the lands that are as I described some of the most magnificent lands in the state of Idaho.

We're talking here today about 9.3 million acres of land that was originally inventoried by the United States Forest Service as roadless. As all of you know, the Forest Service was directed to conduct this inventory and to determine what lands had the potential of being future wilderness lands in the state of Idaho. And these 9.3 million acres that we're talking here today that were put on my plate and handed to me to deal with were the acres that were so inventoried.

The first thing that struck me is, that all the turbulence that has taken place over these 9.3 million acres over the four or so decades that we've been talking about these properties stemmed partly from the fact that everyone was trying to treat all these properties as one-size-fits-all management. And that simply is not the case. I have personally been on a number of these pieces of ground. They number about 280 parcels that were identified as individual parcels, and as I said, what strikes you is, they are different.

Each particular piece is unique. Obviously we can't have 280 different prescriptions, if you would, or classifications for the properties, but we believe that they fell relatively easily into four different categories, five if you consider the special use category that makes up a very tiny amount of the acreages.

So what we did was, we devised four different themes, if you would allow me to call them themes. The first one was Wildland Recreation. The second one is Primitive. The third one is Back Country Restoration. And the fourth is General Forest.

The first two themes, Wildland Recreation and Primitive, which you see from the rule that I proposed, are to be managed somewhat similarly. And I hate to make reference to the prior rules, but I'm going to anyway because everybody else is going to and because it is handy. The 2001, what we'll call the Clinton Rule, provided for proposed management of these roadless areas. And frankly, when I looked at them, the 3-plus million acres that comprised the two themes, the Wildland Recreation and the Primitive, were simply not sufficiently protected under the proposed Clinton Rule. And I'll talk about that in a minute.

I want to back up for just a minute and talk about process. What we did in Idaho is, we put all this out to the counties that had these roadless areas in them, and we asked the counties to hold public hearings and take public input on what was appropriate for the particular areas in their county. The county commissioners did this, and they spent many, many hours doing this. And lots of people had input, people who were local people, people who came in from the outside. But in any event, they took the initial input on these particular areas.

After that, it came to me as the governor to go through all the input that was given, go through the recommendations made by public, by the county commissioners from each of those counties, and then to review it myself and look for additional input if I felt it was necessary.

We did that, and the good thing about all this process is, what we started with was the National Forest Plan that was in effect. So we weren't starting from scratch on each of these properties. We were starting from a place that had occurred over a period of time. That is, we didn't take each one of these properties and say, What would be best for this property starting from scratch?

Instead, each one of the national forests had developed a plan, and that plan had come into being through a lot of different methods and input.

But most importantly for about four decades these properties had been used and managed according to the individual forest plan.

And so to a degree we had a history on each of these 280 pieces of property, and we were able to look at the history and see whether it was appropriate. And so when that process was completed and it came to me, I did want some additional input. And I went out specifically and talked with people that I believed could help me better understand what the public wanted on these properties, in addition to what I think was obvious on some of these properties.

For instance, I went directly to the Native American tribes in Idaho. The Nez Perce tribe gave me a number of recommendations on properties that had particular religious and cultural significance for the Nez Perce people, and they came up with a number of specific recommendations. Tom, do you remember the number? Nine comes to my mind, but whatever the number was, I dealt with Rebecca Miles who is the head of the Nez Perce tribe, and went over the specific recommendations she had.

I can tell you, I accommodated them 100 percent on every recommendation they made for parcels of property that had particular religious or cultural significance for the Nez Perce tribe.

In addition to that, I met with some of the environmental groups that I have to tell you were not, did not I believe have the level of warmth that I'd have liked to have seen for the process and for what I was doing. I think that after we met we had a substantially higher level of understanding as to what we were attempting to accomplish. I listened to what they had to say, and I really believe we were not very far apart, if apart at all, on what we wanted to accomplish with this 9.3 million acres.

Again, for those of you who maybe haven't been fully involved in the wilderness process in Idaho, in the roadless process in Idaho, 9.3 million acres is a staggering amount of real property to be dealing with, and it is a staggeringly unique grouping of lands that have tremendously different attributes as to each particular parcel. So in that regard one would expect that when you came to the table there was going to be tremendous animosity regarding the use of those properties and the future handling, future management and classification of those properties. I can tell you, today that simply isn't the case.

Do we have some disagreements? Of course we have disagreements. You can't be dealing with 9.3 million acres and not have disagreements. But as I look around this room and look at the stakeholders and the people who have interest in these properties, we have, my friends, a whole lot more in common than we have differences as to the handling of these properties.

Let me tell you and back up and again stress to you, as the governor of the state of Idaho I really believed the Clinton Plan did not generate enough protection for the Wildland Recreation and the Primitive themes I've developed, that include a little over 3 million acres. The Clinton Rule as you know provided for some road building under some circumstances in those 3-plus million acres.

The rule that I have provided, and I feel very strongly about this, is that there will be no road building of any kind under any circumstances for any purpose within the wildland recreation and the primitive themes and the 3-plus million acres of property that the wildland recreation and the primitive themes encompass.

And I don't say that in any way demeaning the Clinton Rule. I think the Clinton Rule was attempting to do what I think is virtually impossible, and that is write a prescription for the 9.3 million acres, the 280 parcels of property in Idaho, using one prescription for all of those properties. With all due respect, I just don't believe that it's possible.

I believe that the rule that I have submitted -- and it isn't just me but Idaho's rule, it's Idaho people that have submitted this and through an Idaho process -- I really believe that we will have a substantially higher level of protection for those two themes than we had under any circumstances previously.

And let me say that I fully understand that what we are doing here is, we are engaging in rulemaking. We are not engaged in statute-making. However, I believe that the rulemaking is a good step to develop management for these particular pieces of property. I think that someday the people, all of you and hopefully myself also, will be gathered as we talk about even a higher level of protection for some of these properties, which will be through wilderness legislation.

We are not there now. Obviously for the last four decades people have looked at this, thought about this, and actually some have tried, and all have failed in attempting to come up with legislation regarding these properties. But we are ratcheting up what was in place, and that of course is the Forest Service plan for a plan on a particular forest. We are ratcheting it up a step higher and taking it to formal rulemaking.

And I think that's appropriate, and I cannot stand here and tell you how long the rule will be in place. If history is a teacher, and it generally is, history tells us that what we are doing here, developing a rule, it will probably be in place for a long period of time, particularly as we're talking about the entire 9.3 million acres. It's entirely possible that rulemaking will be in place in perpetuity for at least part of the 9.3 million acres.

However, having said that, I also believe at some point in time there will be a higher level of protection, namely statutory protection, for some of these lands at some time in the future.

Well, moving out of the Wildland Recreation and the Primitive themes into the Back Country Restoration theme, that contains a little over 5 million acres in that property. That property when I designed the proposed rule for those parcels in the Back Country Restoration, what I developed -- and this is in very general terms -- is a management that allowed for temporary road building for very, very, very limited purposes. And those limited purposes are for stewardship purposes.

Now you say, well what are stewardship purposes? Well, two of them and the most obvious ones come to mind, and that is for parcels that are what are called WUE parcels, and that is parcels that have ground that interfaces with human development activity that is already in place. We have had in the state of Idaho and throughout the west really serious problems with fire in recent years. And it is important and in my judgment it is necessary for the Forest Service to do stewardship activities that will lessen the risk for people and for properties in the WUE areas where you have the interface.

Another area that is very important to us is watershed activities in Idaho. We have watersheds that exist on Forest Service property but that are tremendously important to municipal water supplies. And active management in those watersheds is important as a proper stewardship purpose and proper stewardship objective for the Forest Service, in my judgment.

So in the Back Country Restoration I provided that roads could be built on a temporary basis and for these stewardship purposes.

Now with all due respect, I think some of the people, particularly people who have been critical or hesitant regarding the rule, have focused on this. And I really don't think that should be done. I think instead you should focus at the other sides of the coin, what I said couldn't be done in the Back Country Restoration theme. That is, to harvest timber for the sake of harvesting timber. Harvesting timber is not a use that I contemplated for Back Country Restoration parcels of property.

Having said that, I have no objection to the Forest Service going in, doing a stewardship project, and winding up with some timber that they can sell. But what should not be done is, using a ruse, if you would, of stewardship activities to put up for sale commercial timber. That is not what I envisioned in the Back Country Restoration. It's not what I don't think anyone envisioned in Back Country Restoration. I don't want to see that done.

Now having said that, I know there is concern over the language the Forest Service adopted in the proposed rule, which some people believe could be used to do just what I said I didn't want to see done, and that is do commercial timber harvesting for commercial timber purposes.

As a result of that, what I'm going to urge to be done is that the Forest Service take another look at the language that they have developed for the Back Country Restoration theme, and I'm hoping everyone can sit down at the table and come up with language that is appropriate.

I want to stress that after sitting down and talking with the stakeholders, I don't believe there is any disagreement at all in what all of us want to see done as far as the back country restoration theme is concerned. I do believe there is a concern on some people's part that the language that the Forest Service has developed isn't appropriate to accomplish what I want to see accomplished in the Back Country Restoration theme.

So again I would urge with all due respect to the Forest Service that they consult with the appropriate stakeholders to develop appropriate language to see that we do all accomplish what we want done in the Back Country Restoration.

Let me tell you that I think that probably the most appropriate process to do that is to engage the RACNAC committee. I think the RACNAC committee serves a tremendously important part of the process in developing this rule. The RACNAC committee helped me as I developed this rule. I'm hopeful they were helpful to the Forest Service as the rule was developed. And the makeup of that RACNAC committee I think makes them uniquely qualified to serve as a clearing house to help develop the language that will resolve any concerns that exist as far as the Back Country Restoration theme.

That brings me to the General Forest theme. The General Forest theme is around 600,000 acres of ground. There was a miscue I think originally. We talked about 500,000 acres. It is in reality about 600,000 acres. Now for those of you who want to focus on that, I would plead that you not focus on that and focus instead on the upper end of this and what we have done at the upper end of this.

The General Forest theme that we developed at the end of this in my judgment is property that does not fit the roadless thought or roadless belief or roadless idea of what all of us have of roadless areas. First of all, there is very little timber in these areas. It is mostly areas that usually are managed by the BLM, rather than the Forest Service. Most of the merchantable timber is what we affectionately refer to as sagebrush. And it doesn't even have a first stick of timber in it, let alone anything beyond the first stick. If it's been burned it is mostly about 18 inches high.

This is not ground that we ought to be choosing up sides and fighting over to protect as roadless ground. If we do that, we lose our focus on the rest of the ground.

It is ground that I believe, with all due respect to the Forest Service, really should not have been included in the inventory in the first place. Much of this ground is heavily routed. If you walk on to the property and you plopped yourself down and said, Look, I think I'll visually inventory this and see what we have here, you'd ask yourself: How did this ever get in the inventory of roadless in the first place?

So my friends, I would urge everyone to keep our focus on the upper themes that I have, particularly on the Wildland Recreation and particularly on the Primitive themes, and let's all agree that the Roadless Rule we have provided that I've asked the Forest Service to adopt is the highest level of protection for that 3-plus million acres that has ever been proposed for these particular parcels of property.

Finally, there's the Special Use, which is a very small number of acres included in that. I'm really not going to spend any time on that.

I've talked substantially longer than what I had planned on talking in the first place, but let me say this. This is a good plan. It is a plan that I believe protects these properties as they should be protected. I think it is a realistic protection for these properties. I think it is a protection that, particularly in the WUE areas and the watershed areas gives the Forest Service the ability to do the things that we ask them to do to manage some of these small amount of acreage that are included in the Back Country Restoration theme, and it is a resolution I believe of a fight that has been going on a long time and really brings a lot of people together, and brings us to a point that I think that we can agree on, and is really in the best interest of the people of the state of Idaho and people in the United States of America.

Thank you so much for this time, and thank you for the opportunity to present here today and to urge that we adopt the rule with the minor change that I have suggested. And that is, a re-wordsmithing of the language in the Back Country Restoration where roads can be built.

Thank you.