

roadlessdeis@fs.fed, The Wildlife Society Comments

To: roadlessdeis@fs.fed.us
From: Thomas Franklin <tom@wildlife.org>
Subject: The Wildlife Society Comments on Roadless DEIS
Cc:
Bcc:

14 July 2000

USDA Forest Service-CAET
Attention: Roadless Area Proposed Rule
P.O. Box 221090
Salt Lake City, UT 84122

Ref: Wildlife Society comments on the Roadless Area Conservation Proposed Rule, Federal Register, 10 May 2000 (Vol. 65, Number 91).

Dear Reader:

The Wildlife Society appreciates the opportunity to comment on the proposed rule for Roadless Area Conservation. Founded in 1937, the Wildlife Society is the association of wildlife professionals dedicated to excellence in wildlife stewardship through science and education. With nearly 9,000 members, we advocate a scientific approach to managing and protecting the Nation's wild living resources.

The Wildlife Society commends the Forest Service for addressing the issue of roadless area conservation. Certain wildlife species are sensitive to roads and related human activity. The in-depth examination of the impacts of this proposal in the Draft EIS is helpful; however we wish to identify some likely unintended consequences of the rule. In some cases, a broad-reaching rule such as this which generalizes the needs of National Forests may restrict the ability of resource managers to respond to time-sensitive, critical resource needs. We recognize the need to protect certain sensitive areas from road building. However, we urge you to consider including provisions for road construction under special conditions for emergency resource conservation through active management, as you have provided for protection of human life and property. Our comments below for §294.12(b) address this issue in more detail.

At first glance, a generalized, nationwide rule may seem like the appropriate answer, but in application it may not accommodate the need to address complex regional problems. We suggest a more flexible rule that allows consideration of the needs and concerns of each region of the country. In some eastern National Forests, for example, the structure and composition of certain forests currently inventoried as roadless areas may require occasional management to maintain habitat values for key wildlife species. Administrative access should be available to meet these wildlife management objectives. Many western forests present their own challenges after decades of fire exclusion that has changed tree species composition and distribution, suppressed understory food plants, and built high risk of unnatural wild fires of damaging intensity. Access by roads can help managers address these problems, but roads also pose risks to brown bears and endangered fish. Resource managers need the flexibility to devise solutions to these dilemmas and modern temporary roads are one such tool when an analysis of other access options (air, animal, foot) prove infeasible to achieve the desired condition.

Collaborative approaches also can effectively address complex road management challenges in specific regions of the country. For example, members of The Wildlife Society in Montana, Idaho, and other states joined

in pioneering agreements among state and local interests in partnership with the Forest Service to package together management treatments for forest stands, road systems, and streams. Such work as the Flathead Common Ground project in Montana and the Clearwater Elk Initiative in Idaho should be considered as models for developing specific wildlife habitat improvements.

We recommend that the Forest Service establish a process to review special requests that reflect agreement between both state wildlife agencies and national forest managers. Permission should be granted to construct a road in a previously roadless area if the two parties can identify a need and provide sufficient justification that active management within the roadless area will lead to an increase in the long-term conservation of wildlife.

The Wildlife Society also feels strongly that the proposal should not exempt the Tongass National Forest from roadless area conservation for the next four years.

Specific comments

\$294.12(b)- Provisions for Critical Management Needs

Within some inventoried roadless areas, there are conditions that may justify road construction for management to prevent the severe destruction or degradation of natural resources through wildfire or other catastrophic events that have a measurable risk potential. In some cases, the destruction caused by these catastrophic events could far outweigh any potential threats posed by road construction in these same areas. For these reasons, The Wildlife Society suggests the inclusion of the following statement, either under (b)(1), or as a separate circumstance: "A road is needed to protect isolated wildlife populations, rare ecosystems, threatened or endangered species, or the integrity of a watershed, if the long-term resilience of that resource is severely threatened by an event whose impact could be mitigated with actions requiring road construction."

In addition to responding to the emergency conditions addressed above, we also recommend provisions that allow flexibility for region- or forest-specific needs. We urge the Forest Service to establish a review process for special requests from combined state and federal resource management professionals for temporary road construction necessary to improve resource health or wildlife habitat. The interested parties should provide credible, scientific evidence that the long-term resource improvements derived from management made possible through road construction greatly outweigh the negative effects of the road construction itself. This provision should not be a means to allow more road construction for multiple-use purposes; it should simply provide for flexibility in circumstances when resource professionals determine that further active forest management that requires roads is necessary to restore the long-term resilience of an ecosystem or critical wildlife population.

The purpose of the proposed roads must be to improve a facet of or overall ecosystem health primarily for the sake of the resource or non-consumptive use, rather than for intensive management for a specific desired product. This requirement is necessary to prevent unfair treatment among roadless areas and to maintain the original intention of the roadless area conservation proposal.

\$294.12(c)

This paragraph should not be included in the final rule. The 9 million

acres of roadless area in the Tongass National Forest should be protected under the roadless area conservation policy.

The Tongass National Forest of southeast Alaska is a valuable part of the National Forest System, providing the largest tracts of old-growth temperate rainforest left in the world. The Tongass provides outstanding habitat for valued species such as bald eagles, Sitka black-tailed deer, marten, wolves, brown bears, and salmon. Wildlife populations of these and numerous other species would be sensitive to fragmentation and disturbance caused by the development of the 400 miles of new roads planned for the Tongass over the next four years. Over 200 scientists, including many of the Tongass plan peer reviewers and expert panelists, agree that there is no scientific basis to exclude the Tongass from roadless area protection.

\$294.13

The Forest Service should clarify the directive to "evaluate the quality and importance of the values associated with unroaded areas." This facet of the proposed rule has the potential to significantly influence the management of many valuable unroaded areas of National Forests if the implementation procedure is clearly defined. Without clear definition, however, this aspect of the proposal may be ineffective.

The Wildlife Society suggests that an objective analysis, similar to that designed for the roads analysis (Forest System Road Management Proposed Rule), be used in evaluating unroaded areas at the forest plan level. Perhaps specifications could be made to apply this analysis to other unroaded areas of a certain size or value, such as those areas between 1,000 and 5,000 acres in size or areas with the characteristics listed in \$294.13(b) (2).

The proposed rule for Roadless Area Conservation is a significant step towards sound management of the diverse resources of our National Forests. There is an urgency with which road development and the related potential adverse affects on wildlife populations needs to be checked. As the Montana Chapter of The Wildlife Society states in their Position Statement on Motorized Recreation in Wildlife Habitat, "In addition to biological and ecological concerns, it is also evident that ethical aspects of mechanized relationships with wildlife need to be addressed. Responsible resource management demands that provisions for motorized recreation be carefully planned and implemented to prevent irreplaceable wild land and biological communities from diminishing or becoming irreparably compromised." The issue of road development is complex and broadly reaching. We appreciate the Forest Service effort to address it in a comprehensive manner. Thank you for considering the views of wildlife professionals.

Sincerely,

Thomas M. Franklin
Wildlife Policy Director
The Wildlife Society
5410 Grosvenor Lane
Bethesda, MD 20814
Phone: 301-897-9770
Fax: 301-530-2471
<http://www.wildlife.org/index.html>