



KENTUCKY — TENNESSEE
SOCIETY OF AMERICAN FORESTERS

P.O. Box 1071
Knoxville, TN 37901-1071

December 15, 1999

The Honorable Fred Thompson
U.S. Senate
Washington, DC 20510

Dear Senator Thompson:

Attached is a letter of public comment on the planned Forest Service Roadless Policy proposed by President Clinton (Federal Register Document 99-27300).

We copied you on this letter because the executive is trying to circumvent Congress and the Forest Service planning process that involves public participation at the local level on each National Forest. This rulemaking process will affect an estimated 10,000 acres on the Daniel Boone National Forest in Kentucky and 85,000 acres on the Cherokee National Forest in Tennessee.

We wanted the congressional delegations from Kentucky and Tennessee to know the position of the professional forestry society on this issue. We favor the *no action alternative* as outlined in the letter.

The Kentucky-Tennessee Society of American Foresters represents over 400 professional foresters and natural resource managers in Kentucky and Tennessee whose mission is to advance the science, education, technology and practice of forestry to ensure the continued health and use of forest ecosystems to benefit society. We are the professional scientific and education organization representing the profession of forestry in Kentucky and Tennessee.

Thank you for your support of professional forestry.

Sincerely,

Wayne K. Clatterbuck
Policy Chair
Kentucky-Tennessee Society of American Foresters



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Knoxville, TN 37901-1071

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USDA Forest Service-CAET
Attention: Roadless Areas NOI
P.O. Box 221090
Salt Lake City, UT 84122

Re: Roadless Area Proposal

Dear Project Team Leader:

Thank you for the opportunity to comment on the proposed Forest Service roadless policy Notice of Intent (NOI) published in the Federal Register on October 19, 1999 (Document 99-27300). The Kentucky-Tennessee Society of American Foresters (KTSAF) represents over 400 professional foresters and natural resource managers in Kentucky and Tennessee whose mission is to advance the science, education, technology and practice of forestry to ensure the continued health and use of forest ecosystems to benefit society. We are the professional scientific and educational association representing the profession of forestry in Kentucky and Tennessee.

Considering the available alternatives presented on page 56307 of the NOI, we endorse the no action alternative (making no change in current policy).

We believe that all decisions about the status of roadless areas should be made through the forest planning process, at the local or national forest level. A broad rulemaking process that could affect all roadless areas through one national decision cannot address the unique forest conditions of individual areas. Thus, KTSAF is opposed to a unilateral decision to *protect* all roadless areas. We also question the term "protect" in the NOI. No definition is given for the term. We support forest protection, but we consider these lands already protected since they are national forests. Without definition, we are concerned that managers implementing the policy will have little specific direction.

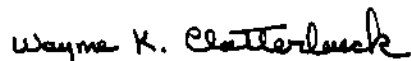
This rulemaking process would be contrary to the Forest Service's emphasis on collaborative decision-making and collaborative partnerships, the Forest Service planning process and forest management in general. Changing the status of roadless areas from multiple-use management, as established in the National Forest Management Act of 1976, to some type of restricted use should only be considered on a case by case basis. In addition to being inconsistent with the planning process, this proposal would overturn existing forest plans. This is unacceptable. Citizens from all over the nation have worked to create these forest plans, they cost millions of dollars to develop, and through this possible decision these plans could become useless.

There is no doubt that some roadless areas should be removed from active forest management. However, many roadless areas need forest management. Forest management incorporates multiple stewardship objectives, including insect and disease prevention and control, wildlife habitat management, fuels treatment and construction and maintenance of roads needed for forest access. A further decrease in the amount of land available for vegetation management is unacceptable for the continued health and prosperity of the forest. National Forests should be the model for demonstrating how forests should be managed for multiple values, including timber products, wildlife, recreation, water and scenic values. Forest management including timber is not only compatible with good ecosystem management, it is one of the most effective tools available to insure sustainability of healthy ecosystems. We note that one of the alternatives the Forest Service is considering would prohibit management all together. This could have disastrous consequences. National Forests are not National Parks!

This NOI seems to focus on forest roads. KTSAF believes forest roads, properly constructed and maintained, are a critical part of forest management, emergency response and recreational use. Roads should be constructed and maintained in an environmentally sound manner following standards, laws and regulations. Forest roads should be treated as a capital investment, not a deterrent to forest management.

We appreciate this opportunity to comment on this proposal. To re-emphasize, KTSAF supports the no action alternative. We look forward to a continuing dialogue in the forest planning process for the best management of National Forests.

Sincerely,



Wayne K. Clatterbuck
Policy Chair
Kentucky-Tennessee Society of American Foresters

cc. Senator Mitch McConnell
Senator Jim Bunning
Senator Fred Thompson
Senator Bill Frist

Congressman Edward Whitfield
Congressman Ron Lewis
Congresswoman Anne Meagher Northup
Congressman Ken Lucas
Congressman Harold Rogers
Congressman Ernie Fletcher

Congressman William L. Jenkins
Congressman John J. Duncan, Jr.
Congressman Zach Wamp
Congressman Van Hilleary
Congressman Bob Clement
Congressman Bart Gordon
Congressman Ed Bryant
Congressman John S. Tanner
Congressman Harold E Ford, Jr.