



AMERICAN FISHERIES SOCIETY

MONTANA CHAPTER

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

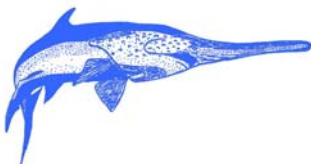
Dear Forest Service Content Analysis Team:

The Montana Chapter of the American Fisheries Society (MCAFS) appreciates the opportunity to provide comment on the U.S. Forest Service's (USFS) proposed rule to replace the Federal Roadless Conservation Rule, adopted on January 12, 2001, with a petition process initiated by state governments.

The MCAFS is an organization of professional fisheries scientists and students from multiple agencies, universities and the private sector across Montana. One of our objectives is the conservation, development and wise utilization of Montana's fisheries. We are extremely interested in the conservation of native and recreational fisheries in Montana, and we believe that the Roadless Conservation Rule is an important conservation and management strategy that protects critical fish populations and the habitats on which they depend. Therefore, we urge the USFS to reinstate the Roadless Conservation Rule to ensure the long-term conservation of these important fish and wildlife habitats.

We believe that replacement of the existing Roadless Conservation Rule will have broad negative consequences for Montana's and the nation's roadless areas. The proposed process does not guarantee federal protection for Inventoried Roadless Areas, and does not provide a cohesive management approach if the state fails to file a petition (within 18 months), or if the petition is rejected, as management of these areas will revert to individual management plans.

In Montana, national forest system lands form the headwater landscapes of most our major river systems, and are critical areas for populations of native salmonids, including the threatened bull trout *Salvelinus confluentus*, arctic grayling *Thymallus arcticus*, and westslope cutthroat trout *Oncorhynchus clarki lewisi*. Additionally, national forest system lands support internationally renowned sport fisheries, which are extremely important to Montana's economy. Management of aquatic and riparian habitat on national forest lands is of tremendous interest to the MCAFS.



We believe that policy decisions affecting public lands should be made using the best available science. There is a growing body of evidence that identifies responsible roadless conservation as one of the cornerstones of sustainable public lands management. For example, the USFS January 30, 2002 final report, *Land Management Recommendations Related to the Value of Low Road Density Areas in the Conservation of Listed Salmon, Steelhead and Bull Trout*, found that undesignated low road density areas on national forest lands (those outside of designated wilderness or wilderness study areas) play an important role in the conservation of native salmonids, and should be considered a key component of the long-term conservation strategy for listed fish species in the Pacific Northwest.

The MCAFS is keenly aware that the existing national forest system road network in Montana and elsewhere has a substantial adverse impact on fish populations, due, at least in part, to the overwhelming backlog of routine maintenance and repair. The USFS cannot afford to maintain the extensive road network created during the height of forest commodity production in the 1980s and 1990s.

The MCAFS strongly recommends that the USFS reinstate the 2001 Roadless Conservation Rule. The 2001 Rule received very thoughtful input by the public and is based on sound and relevant science. In addition, we request that the USFS manage the existing national forest system road network in a fiscally responsible manner by maintaining those miles of the national forest system road network that are within the current USFS maintenance budget and possibly obliterating the remaining miles.

Thank you for the opportunity to comment, and we look forward to your reply and decision.

A handwritten signature in black ink that reads "Clint Muhlfeld". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Clint Muhlfeld, President
Montana Chapter of the American Fisheries Society