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Comments: The following is an addition to the Roadless Areas/Remote Areas and Eligibility for Wilderness comments in our Insect and Disease Phase 2 Project objection.

As stated in Southern Environmental Center, Sierra Club, et al Appeal of the Jefferson National Forest, p. 27

"Dismal Creek Area - Blacksburg District (6,906 acres with 2,818 semi-primitive non-motorized core - VMT at 47, 1997 Process Paper at 9)"[See Vat-Dismal.pdf, attached]

This area not only has a 2,818-acre semi-primitive core, but also harbors eleven miles of the Appalachian Trail and the upper watershed of Dismal Creek from ridge top to ridge top. The agency disqualified it because of a road density of .63 miles per thousand acres, but in doing so rejected repeated proposals that would have drawn out improved roads to reduce the road density well below .5. See June 13, 1997 letter from Peter Kirby to William Damon at 3 (attached) and 1999 Proposal by Dave Muhly on Dismal Creek Highlands Management Area (attached). Both Kirby and Muhly suggested adjusting boundaries to exclude portions of FS 1015 parallel to Rt. 201. Refusal to adjust the boundary to include this large area with a large semi-primitive core is clearly arbitrary and contrary to the Forest Service Handbook criteria and the purposes of The Wilderness Act and Eastern Wilderness Act. See Detailed SELC Analysis of Roadless Inventory attached at 3-4." (Attached SELC Analysis Jefferson Roadless Inventory 4-21-04)

The attached Detailed SELC Analysis of Roadless Inventory refers to: a Letter from Joslin, Regional Forster, to James E. Loesel, August 19, 1995. Detailed decisions on boundaries need not be made until the wilderness evaluation, step two of the process. (Attached Joslin Ltr to Supv 5-19-95.pdf)