

## VIII. CONSULTATION WITH OTHERS

RARE II formally began early in June 1977 with a briefing for Federal agencies and representatives from national special interest organizations. This meeting was followed by a Department of Agriculture news release that identified the RARE II process and opportunity for public involvement in the effort. Other briefings were held during the summer, both to inform and to involve Congressmen and their staffs, Federal agency staff, and representatives from national organizations.

Involvement of the general public began during this same period with information being made available about the process and with establishment of workshops throughout the country to seek public comment. More than 50,000 people responded, including 17,000 who attended the 227 workshops conducted nationwide.

Workshops and requests for input during the summer of 1977 were directed toward two specific issues. First was a request to review the inventory of roadless and undeveloped areas the Forest Service identified and mapped according to criteria established to insure national consistency. The public was asked to point out oversights made by the Forest Service and suggest areas that should be included in or deleted from the inventory.

The second issue was designed to allow the public an opportunity to identify those factors it felt should be considered in evaluating potential additions to the National Wilderness Preservation System. Factors were of two general types: one dealt with those values that would increase quality of the System and the other dealt with social and economic impacts that should be used in evaluating tradeoffs of wilderness designation. These characteristics were utilized in generating alternatives described in Section IV. This phase of RARE II was initially completed with a listing of the inventoried roadless areas and criteria that should be considered published in the November 18, 1977 Federal Register.

Periodic briefings of Congressional staff, Federal agencies, national organizations, and others were held throughout the winter of 1977-78 to update the status of RARE II and identify next steps in the process. The RARE II staff group discussed data collection, target assignments, alternative generation, socioeconomic analysis, and the draft environmental statement.

During this same period, meetings were held with all wilderness managing agencies to identify components of the System, potential additions to it, and the relationship of landform, ecosystem, wildlife, and accessibility in development of a quality National Wilderness Preservation System. An interagency wilderness policy task force was created at the Assistant Secretary level to expedite the process. The Forest Service conducted numerous work sessions during late 1977 and early 1978 to which individuals representing various special interest groups were invited and did attend as full working partners. Development of a system to rate wilderness attributes, use of an economic input/output model, generation of alternatives, planning for a national public involvement effort, and other subjects were developed with these groups. Input received during these meetings has been utilized to develop an understanding of and strengthen the RARE II process.

Data gathered by the Forest Service from in-Service sources and also from other agencies, organizations, and companies, along with response received from the public were used to develop a series of alternative approaches in April and May of 1978. They were displayed and made available for public review and comment in a draft environmental statement filed with the Environmental Protection Agency on June 15, 1978. The National Statement, supplemented by twenty individual State and/or geographic area supplements, was made available to Federal and State agencies, national and regional special interest groups, and numerous individuals throughout the country.

Public briefings were conducted shortly after filing the statement to explain the RARE II process and answer questions concerning alternative approaches displayed in the draft. In addition, the public was invited to review resource and other data made available at all Forest Service field offices and visit individual roadless areas to obtain first-hand knowledge before commenting on the environmental statement.

The public was asked to specifically respond to various alternative approaches, criteria to be used in evaluating alternatives and making a decision, and allocation of individual roadless areas. The public had until October 1, 1978, to submit their comment to the Forest Service. Response was overwhelming in that 264,093 separate inputs (personal letters, resolutions, petitions, form letters, and response forms,) bearing 359,414 signatures were received. A centralized analysis of the comments was made in Salt Lake City, Utah. Content analysis was the computerized process used to record RARE II public comment and provide an objective method for analyzing the large number of comments. The analysis is summarized in Appendix U, page U-1 through U-55. Summary of the complete content analysis process may be reviewed in Regional Offices of the Forest Service. The input received is available for review in Salt Lake City.

Comment received during the 3 1/2 month public review period was primarily directed to three issues identified in the draft statement. The bulk of response was directed toward the preferred allocation of individual roadless areas and reasons for that preference. Next in magnitude was response concerned with alternative approaches followed by comment on identified decision criteria. In addition, numerous individuals commented on the RARE II process and adequacy or inadequacy of the draft environmental statement. It is not feasible to repeat each individual's comments on the draft so it must be summarized. Neither is it possible to duplicate over 264,000 individual responses so only representative letters will be reprinted in this final environmental statement. They may be found in appendix V.

Comments concerning the draft statement, the RARE II process, etc. and the Department of Agriculture's response to the comment follow. Numbers in parenthesis following the comment indicate the number of inputs (I) expressing specific comment and number of signatures (S) the input represents. If no numbers are shown, comment was made primarily by one input.

1. Comment. Opposition to the RARE II program and process was stated in this comment. Comment said RARE II was a land grab, a waste of tax dollars, and unnecessary. We shouldn't decide use of land for future generations based on this process. (I - 5074, S - 11,669)

Response. The RARE II process is necessary for timely resolution of the roadless area issue. It will not, over the long term, waste tax dollars as the issue would still need to be decided through many local land management planning processes. The process does not acquire privately owned land but only allocates National Forest System lands. RARE II is an integral part of the Forest Service land management planning process dealing with inventoried roadless areas.

2. Comment. Roadless areas should be evaluated as individual areas at the local planning level. (I - 4106, S - 4325)

Response. Resolution of non-selected roadless areas remaining following completion of the original RARE effort and a need to add areas previously overlooked necessitated RARE II. The goal of RARE II is to consider the entire National Forest System at one time so that local variations in inventory and allocation of the areas may be minimized. Further, areas are evaluated in total to assure full consideration of national, cumulative effects regarding availability and goods and services for the entire National Forest System. To evaluate roadless areas individually would defeat this goal.

3. Comment. The draft environmental statement is slanted toward nonwilderness as benefits of wilderness are not discussed. (I - 3139, S - 4804)

Response. The discussion of Wilderness in Section V, Effects of Implementation, has been expanded to address positive benefits obtained from wilderness classification. In addition, discussion of each resource such as air, water, vegetation, etc. has been expanded to elaborate further on positive benefits wilderness would provide for each.

4. Comment. Range of alternatives displayed in the draft isn't broad enough. Alternatives are generally biased in favor of nonwilderness. (I - 3026, S - 3456)

Response. A complete range of alternatives is expressed by inclusion of both B and J - all nonwilderness and all wilderness alternatives. A number of alternatives between these extremes produce more nonwilderness areas than wilderness, but solely in response to a mechanical generation process that attempts to build a high quality Wilderness System with least practical resource output cost. Using procedures that only utilized one part of each alternative generation process may have provided more wilderness areas but would not represent realistic tradeoff issues shown in the alternatives displayed. The public, as emphasized in the transmittal letter at the front of the draft statement, was encouraged to look at various alternative approaches and comment on criteria utilized to develop approaches. This process then permitted public response and/or acceptance of singular or multiple factors used in building an alternative. Response received was used in developing the preferred alternative contained in this final statement.

5. Comment. More time is needed to permit the Forest Service to gather and analyze more data for RARE II as well as a need for more time for the public to respond. This comment was often accompanied by both formal and informal requests to extend the deadline for completion of RARE II. The requests came from local, state, and Federal agencies and organizations, and numerous elected officials. (I - 2377, S - 3288)

Response. Commitment of the Administration to timely completion of the RARE II effort does not permit any flexibility or extensions of time in responding to RARE II. The Forest Service has utilized its total resources within available timeframes to assimilate essential data for conducting the evaluation process. The process must be completed without stopping management of the total National Forest System. The time period allotted to respond to the draft statement exceeded the 60 days required by Forest Service policy as over 100 days were provided between the June 15 date of filing and the October 1 close of record. Formal requests to extend the time period for receipt of public response were handled on an individual basis.

6. Comment. The draft environmental statement is considered inadequate. (I - 2316, S - 3116)

Response. The final environmental statement has been revised to strengthen the analysis. Numerous response to comments in this section point out areas of the draft that have been rewritten. General comment that the environmental statement is inadequate can only be responded to in a general way. Specific comments on inadequacy have been addressed throughout this section.

7. Comment. Emphasis in the draft statement is placed on benefits of development rather than what development costs might be. (I - 1198, S - 1348) An additional comment was received that can be addressed in conjunction with the first comment. It said evaluation and assessment of economic impacts is basically inadequate. (I - 804, S - 1351)

Response. Actual costs of developing each individual roadless area are virtually impossible to obtain for use of the area is not known. This more intense level of analysis can only be accomplished at the local planning level. However, following issuance of the draft, the Forest Service recognized a need to be able to evaluate roadless areas from the standpoint of value received versus dollars spent to obtain that benefit. The result was the Development Opportunity Rating System (DORS). The system assumes full nonwilderness resource development of each roadless area and estimated costs necessary to develop it. A rating is assigned from 0 to 15 representing cost effectiveness of the roadless area. (The system is explained more fully in appendix W). The rating is used in selecting areas for either a wilderness or nonwilderness allocation to ascertain more cost effective areas are available for use. The rating system is most useful in making allocations when all other factors are equal. Also, analysis and evaluation of economic impacts when making specific allocations has been improved with refinement of the input/output models and more current employment statistics.

8. Comment. There was too little time for public response. (I - 719, S - 1151)

Response. Timing for issuance of the RARE II Draft Environmental Statement was planned to coincide with the 1978 summer field season, giving the public an opportunity to get their feet on the ground in individual roadless areas. The time period for response was from filing date of the draft, June 15, until October 1, or about 108 days. This time period exceeds the required time for public review of a draft environmental statement. It was felt to be sufficient for analysis of RARE II alternatives.

9. Comment. The draft environmental statement was hard to read and understand. It was too complex and contained too much information. (I - 706, S - 1003)

Response. The final statement has been written with the need to keep a very complex process understandable. Phraseology and terms unique to the Forest Service have been reduced to enhance readability of the document. The amount of information contained in the draft must be carried through the final and even expanded to insure understanding of the RARE II process.

10. Comment. There was not enough information presented in the draft to make a decision. The analysis was shallow, misleading, and contained unsupported facts. (I - 607, S - 719)

Response. The amount of detail presented in the draft required supplementation by the input received on the draft to complete the decisionmaking process. It was stated in the transmittal letter that the public's input was a necessary part of the total RARE II process. Public preference for allocation of individual roadless areas, alternative approaches, and decision criteria were identified as essential ingredients in the decisionmaking process. At the time the draft was filed, there was not enough information to make a decision and this fact was so noted. The analysis has been strengthened in each of the resource use areas with insertion of new data, etc. Facts and figures utilized throughout the statement when not otherwise footnoted are Forest Service statistics obtained from day-to-day working papers and other reports such as RIM (Recreation Information Management) etc. Other facts and information used have been attributed to their respective sources.

11. Comment. A cost/benefit analysis has not been used in the draft statement. (I - 565, S - 785)

Response. A cost/benefit analysis per se is not required in an environmental statement. It is essential that economic effects of the proposed action and alternatives to the proposal are analyzed. Economic analysis in the draft utilized an input/output model addressing basic issues of employment, population, income, and value added to the economy. Utilization of this modeling technique along with the DORS process will indicate economic effects and give a feel for economic feasibility of development.

12. Comment. The Wilderness Attribute Rating System (WARS) is arbitrary in concept and poorly designed. (I - 523, S - 1150)

Response. WARS is built upon those indicators of wilderness quality specifically identified in the Wilderness Act of 1964. It assigns a rating of from 1 to 7 that indicates how well a roadless area meets criteria for being natural, for being apparently natural, and for providing opportunity for solitude and a primitive recreation experience. The system also rates supplementary characteristics such as scenery, educational, scientific, and historical values as identified in the Act. The Wilderness Attribute Rating System is felt to be an objective system for rating wilderness attributes of a roadless area since it utilizes those factors specifically identified in the Act. It is agreed the numerical range could be different than the 1-7 range applied

but the system would remain intact. A more objective system that is perhaps "less" arbitrary than WARS has not been suggested. Application of the system as discussed on page 22 of this statement, has been uniformly applied with outside, interested individuals reviewing the assigned ratings.

13. Comment. Effects of implementing alternatives on ecosystems and evaluation and assessment of ecosystems is inadequate. (I - 498, S - 663)

Response. Alternatives displayed in the draft environmental statement provided varying representations of ecosystems identified for the RARE II evaluation process. The goal of achieving this characteristic was developed in response to the public's stated need for factors to be used in adding areas to the Wilderness System. Targets assigned to meet this goal were established by the Forest Service based on their perception of an adequate number of areas to represent each ecosystem. Ecosystems were developed by combining Bailey's ecoregions and Kuchler's potential natural vegetation. This combination, while regarded by some as being too extensive, was utilized because it is refined enough to be meaningful but not so intensive as to become unmanageable. Delineation of ecosystems as used in the draft statement will continue to be used in the final.

14. Comment. A good job was done in the draft statement to display alternatives and environmental impact. RARE II is a commendable effort undertaken by the Forest Service. (I - 479, S - 1094)

Response. No response necessary.

15. Comment. The RARE II inventory and analysis in the draft statement is in error but for two opposing reasons. First, some people felt that it did not include all roadless areas while others felt it included areas that are roaded. (I - 439, S - 665)

Response. Guidelines published in 1977 to direct the RARE II inventory effort have been strictly adhered to throughout the process. Challenges to the inventory have been addressed on a case-by-case basis with determinations made to either include or exclude areas. The inventory at this time is complete with most of the challenges resolved.

16. Comment. Assessment and evaluation of the wilderness resource are inadequate. Benefits of wilderness classification need to be stated. (I - 435, S - 468)

Response. The final environmental statement has been expanded to include positive wilderness benefits from the standpoint of both enhancing the Wilderness System and protecting critical resources. Specifically, discussions of vegetation, soil, air, water, and environmental amenities have been rewritten.

17. Comment. Assessment and evaluation of the minerals and energy resources are inadequate. Not enough is known of these resources on which to base a decision. No roadless areas should be recommended for wilderness classification until the mineral and energy potential is known. (I - 425, S - 884)

Response. Current information regarding minerals and energy has been compiled to develop a numerical rating system for potential. The system is more fully explained

on page 22. It updates knowledge of the resource and permits use of a more precise evaluation tool in reaching decisions for allocation of roadless areas. Due to its very nature, not all can be known of mineral and energy potential contained within the RARE II areas. The resource was a factor used in the decision making process and normally, roadless areas with proven, producing, or high potential mineral or energy resources were not recommended for wilderness.

18. Comment. Assessment and evaluation of landform are inadequate. Landform types are too broad to be used as a characteristic. (I - 355, S - 396)

Response. Landform types as described by Hammond have been used to establish goals for equitable representations of physiographic regions. Targets assigned by the Forest Service were determined to be adequate to meet the goal. Further breakdown of Hammond's physical subdivisions would prove unmanageable in addressing the issue of adding representative landform types to the Wilderness System.

19. Comment. Evaluation criteria are not explained and are inadequate. (I - 348, S - 433)

Response. Evaluation criteria and the role they would play in decision making was explained on page 19, 67, 68, and 69 of the draft environmental statement. They were identified as being those factors important in developing a proposed course of action to be displayed in the final environmental statement. Evaluation (decision) criteria were tentatively proposed in the draft as factors the Forest Service felt should be considered in decisionmaking, with a request for public comment on them. Many individuals responded to the proposed criteria and also suggested additional criteria. Any inadequacies identified during public review of criteria were pointed out by individuals responding to the draft.

20. Comment. The RARE II evaluation doesn't reflect public involvement. (I - 343, S - 502)

Response. The development of alternatives displayed in the draft statement was based on a perceived public need for both wilderness and nonwilderness values. Certain characteristics the public identified were used in creating alternatives. But, the total public was not and could not realistically be involved in the generation of alternatives, the first step in the evaluation process. Before public involvement could become a realistic part of the total process, alternatives had to be prepared to give them something with which to react. That public involvement period ended on October 1, 1978, and saw over 359,000 individuals become involved in RARE II. That involvement is reflected in development of the proposed action displayed in this environmental statement.

21. Comment. There was too little publicity given to the RARE II process. (I - 329, S - 558)

Response. Periodic briefings, news releases, and spot announcements on radio and TV were some of many techniques used to acquaint the public with RARE II. Articles concerning the program appeared in almost every newspaper and special interest periodical. RARE II represents one of the largest public involvement efforts the Forest Service has undertaken. Additional publicity will be provided when the final environmental statement is filed with EPA.

22. Comment. The draft environmental statement is slanted toward wilderness as benefits of nonwilderness are not discussed. (I - 320, S - 344)

Response. Alternative approaches displayed in the draft environmental statement spanned a complete range of options for allocating roadless areas. Approaches were based upon factors designed to produce various mixes of wilderness and nonwilderness type values. The mix was felt to be equitable. The final statement compares a proposed course of action against the same draft alternatives but has updated the analysis describing benefits of nonwilderness use. The discussion of wilderness benefits has also been strengthened.

23. Comment. Effects of implementing a series of alternatives on the timber resource is inadequate. It has not been properly assessed and evaluated. (I - 314, S - 765)

Response. The draft statement displayed timber value potential that would be realized with alternative approaches developed by the process. Values were expressed in terms of millions of board feet of sawtimber and products available as areas are allocated to nonwilderness use. Value foregone is timber volume that could not be realized if areas were allocated to wilderness. Potential physical and biological impacts were not a part of the evaluation. As stated at the beginning of Section V, Effects of Implementation, multiple use management practices employed by the Forest Service are not an issue when roadless areas are allocated. Site specific impacts of timber harvest will be analyzed and evaluated in further land and resource management planning efforts.

24. Comment. Evaluation and assessment of the wildlife and fish resource are inadequate as are effects of implementing the alternatives. (I - 301, S - 424)

Response. Discussion of potential for modification, improvement, or retention of fish and wildlife habitat has been updated in the final environmental statement. As described in Section V, it is virtually impossible to quantify the degree of impact for type and/or intensity of use of the areas allocated to nonwilderness is not known. General observations dealing with species adversely affected or beneficated are the limit of the analysis.

25. Comment. The draft environmental statement is not based on fact. (I - 264, S - 322)

Response. The collection, storage, and retrieval of over 300 individual pieces of data for each roadless area is a monumental task. As stated in the draft, data is constantly being checked and updated to insure the most complete set of information possible. It is these data or facts upon which assessment, evaluation, and selection of a proposed action are based.

26. Comment. The draft environmental statement does not meet legal requirements as spelled out by the National Environmental Policy Act - NEPA. (I - 182, S-324)

Response. Some specific examples cited by respondents making this comment have been identified throughout this section as specific comment. Response has been prepared for each of these specific comments. The final environmental statement has been updated to reflect concurrence with specific inadequacies pointed out during public

review of the document. General statements that it does not meet legal requirements cannot be addressed as no specific issues were raised.

27. Comment. Effects of implementing a series of alternatives on the Resources Planning Act (RPA) are inadequate. Evaluation and assessment of RPA needs strengthening. (I - 182, S - 235)

Response. Analysis of RPA in Section V has been revised to reflect updated targets and resource potential. Use of RPA targets in decision making was identified as an important factor by the public and has been expanded to show how targets are achieved through the full range of alternative approaches.

28. Comment. Effects of implementing the alternatives on the recreation resource are inadequate. Assessment and evaluation are inadequate. (I - 178, S - 197)

Response. General impacts associated with both wilderness and nonwilderness allocations have been analyzed. At this level of planning, it is virtually impossible to identify site specific recreation impacts. They must and can only be described as potential foregone if excluded by the allocation or potential realized if permitted.

29. Comment. Evaluation and assessment of social concerns are inadequate as are the effects of implementation. (I - 154, S - 172)

Response. Social assessment displayed in the draft statement was based on Forest Service perception of what social changes might be realized. As a professional assessment, it had not yet been supported by public response. Two hundred, and sixty-four thousand responses to the draft statement have strengthened social analysis by supporting or rejecting earlier suppositions. With the additional data, social assessment has been strengthened in the final statement and utilized fully in the decision making process.

30. Comment. The draft environmental statement is sufficient. It is an adequate document that meets NEPA requirements. (I - 145, S - 160)

Response. No response required.

31. Comment. Evaluation, assessment, and effects on the water resource are inadequate. (I - 130, S - 148)

Response. Effects of implementing alternatives on the water resource have been revised to address inadequacies identified by this comment. Specific data from the Environmental Protection Agency and an expanded discussion of Forest Service management techniques for water quality protection have been included. Analysis has been reviewed with EPA prior to its inclusion in the final statement. It is felt to now be adequate.

32. Comment. Effects of implementing the alternatives on resources are inadequate. (I - 108, S - 114)

Response. Strengthening specific resource analysis has been discussed under many of the numbered comments of this section.

33. Comment. Effects of implementing alternatives on the range resource are inadequate as are the evaluation and assessment. (I - 103, S - 107)

Response. This resource heading has also been revised to more adequately analyze potential effects. Of major significance is the discussion of immediate or short range impacts as areas are allocated to wilderness. Grazing is a permitted use of wilderness and reductions of use were difficult to comprehend. With prohibition of certain management techniques under wilderness classification, capacity of the range is eventually reduced but not immediately. Cleaning up discussion of short term losses responds to comments expressed about the range resource.

34. Comment. Alternatives were poorly described in the draft environmental statement. (I - 94, S - 240)

Response. Terminology and factors used in development of alternatives are difficult to understand if only the quick summary of each option is read. An understanding of component factors and combinations used to assemble each option is necessary to comprehend the descriptions. Descriptions have been re-examined and revised to achieve a higher degree of consistency.

35. Comment. Descriptions of roadless areas are lacking. (I - 92, S - 566)

Response. Individual descriptions of nearly 3000 roadless areas would produce an extremely voluminous document. Word descriptions were supplied for various ecosystem and landform types within which roadless areas are located. Narratives in the supplements to the draft statement were intended to give a feel for the environment and, when coupled with size, recreation potential, WARS, and other data, would supply a relatively concise description of the area. The public was also encouraged to get on the ground in these areas to learn more about them.

36. Comment. RARE II process is biased against large areas becoming wilderness. (I - 84, S - 122)

Response. Total resource outputs for any given area when used as threshold levels for nonwilderness allocations did select large, moderately productive areas, leaving smaller areas for wilderness. This was especially true with alternatives C and D. The intent of these options was to insure retention of commodity output potential by utilization of specific criteria. Other alternatives, such as E, F, G, and I, were designed to produce a high quality, diverse Wilderness System. It permitted allocation of areas based on selected criteria without size being a factor. Some alternatives were then biased against large areas while others were not.

37. Comment. Evaluation and assessment of vegetation are inadequate. (I - 75, S - 141)

Response. Discussion analyzing effects of implementing alternative approaches on vegetation has been updated to more adequately assess impacts. As stated in the body of the final statement, actual allocation of the roadless areas will not impact vegetation but activities permitted or restricted may alter vegetation.

38. Comment. Open houses were inadequate. (I - 66, S - 101)

Response. Open houses conducted following filing of the draft environmental statement were designed to clarify the document, explain alternatives, and provide additional or site specific data. They were not organized to argue process or provide a forum for public debate of alternative's merits. They were simply open houses with no set time for everyone to be assembled. They were adequate in terms of meeting objective for holding them as questions were answered and process clarified.

39. Comment. RARE II inform and involve effort was good. There was good publicity, open houses, and brochures were helpful in informing the public of the process. (I - 65, S - 77)

Response. No response necessary.

40. Comment. Impacts of designating a roadless area were not displayed in a state, regional, or national perspective. (I - 63, S - 168)

Response. The strength of the draft statement, including supplements, was based upon the ability to describe impacts of designating roadless areas at local, state, and national level. Identification of multicounty units to assess economic and social changes at the lowest, local level was a major part of the analysis. Costs of allocating roadless areas to wilderness or to nonwilderness uses can be displayed in terms of outputs achieved, employment, and income generated, and quality of areas added to the Wilderness System with displays in the draft. Displays, as just stated, could be summarized for multicounty units, for state outputs, and totaled for viewing national impacts. This analysis has been improved in the final environmental statement.

41. Comment. Evaluation and assessment of air quality and impacts of allocating roadless areas on the air resource are inadequate. (I - 52, S - 56)

Response. As pointed out in the body of the environmental statement, allocation of roadless areas will not have a direct effect on air quality. Redesignation of present air quality standards will not be affected by the action proposed in this final statement. The discussion of air on page 43 has been revised to include additional data on air pollutants and potential or lack thereof for reducing or changing present air quality. Coordination with the Environmental Protection Agency has improved adequacy of the discussion.

42. Comment. Respondents disliked the lack of a preferred alternative in the draft. (I - 46, S - 59)

Response. A proposal was not displayed for reasons identified in the draft environmental statement. The Forest Service felt the public would provide more objective response if they were responding to a series of options rather than reacting to a proposal. In addition, a preferred alternative had not been developed at the time the draft was filed. Public input is felt to be an essential component of the RARE II decisionmaking process so the proposal must wait until response has been received.

43. Comment. The concept of using values foregone lowers the quality of the RARE II process and should not be used. (I - 32, S - 32)

Response. Values foregone or those potential outputs that would not be available for use is the most precise way of displaying effects of implementing a series of alternatives that allocate roadless areas. The act of allocation has no real physical or biological impacts as would normally be associated with project planning. As stated in the draft and re-emphasized in the final environmental statement, effects are primarily social and economic in nature and have to rely upon an analysis of values foregone with roadless area allocations.

44. Comment. Evaluation and assessment and effects of implementing a series of alternatives on the cultural resources are inadequate. (I - 29, S - 37)

Response. Allocation of RARE II roadless areas will not have an effect on the cultural resources. They will continue to be protected and managed as required by law. The proposal contained in the environmental statement cannot change protective laws.

45. Comment. The draft environmental statement did not define the Forest Service share of the National Wilderness Preservation System. (I - 28, S - 45)

Response. Legislation establishing the Wilderness System did not create a limit on total amount of land to be included in the System nor did it assign targets to each Federal land managing agency. The Forest Service share cannot, therefore, be rigidly established. The Renewable Resources Planning Act (RPA) program has established ranges for the amount of wilderness within the National Forest System but "targets" have never been strictly assigned. The process of evaluating potential through both RPA and RARE II involves a great deal of feedback from the public and others so that the range of how much wilderness is desirable can begin to be narrowed down. The Forest Service contribution can begin to be realized as these processes utilizing public involvement provide better definitions of how much.

46. Comment. The Forest Service should have used work groups or ad hoc groups to make RARE II allocation decisions. (I - 12, S - 16)

Response. Diversity of ad hoc groups required to insure all special interests are represented produces two results: first is a very large number of people and second is inability of that group to reach consensus and resolve roadless area issues. Use of a work group was attempted in the State of Colorado with less than an acceptable degree of success during the time available. Fewer than 5 percent of the roadless areas were resolved. Analysis and use of response received from over 264,000 inputs represents utilization of large group comment in deciding allocation of roadless areas. This is the only feasible process that permits all interests to be heard and be a factor in development of the proposed action.

47. Comment. The Environmental Protection Agency found the draft environmental statement inadequate because of its lack of consideration of EPA mandated environmental concerns.

Response. Discussion of air and water, two primary concerns of EPA, has been revised to include a strengthened analysis of anticipated impacts. Close coordination with EPA during preparation of this analysis has produced what is now felt to be an adequate assessment.

48. Comment. EPA found the draft inadequate because of its use of unsupported and undocumented statements, its lack of related data on demands for resources, and its unbalanced economic approach.

Response. Documentation of statements made in the final environmental statement has been attributed to proper references when appropriate. Other statements, as noted throughout, represent Forest Service perception of potential impacts and their analysis of actual outputs derived from the RARE II data base and other in-Service documents. Demands for resource use, both wilderness and nonwilderness, are enhanced by public input received on the draft. Allocation of roadless areas to meet these demands can be made in response to input. That, along with the dependency of local communities and the entire Nation upon commodity values, has produced a more precise assessment of need. The economic approach, as discussed in response to comment 7, has been improved.

49. Comment. Public notification of supplemental information made available in September to improve inadequacies in the draft was not sufficient to meet the intent of NEPA for public disclosure.

Response. "Supplemental information" provided was not designed to improve the draft environmental statement. It was notification of status of ongoing data collection and analysis in what has always been described as a dynamic process. The Forest Service has been and will continue to be committed to complete disclosure of resource data as part of RARE II. Data accumulated and updated for each roadless area and addition of improved processes for analyzing impacts of RARE II have been continuous. Notification in the Federal Register of September 13 was designed to make this update known.

50. Comment. Silvicultural treatments employed on National Forest System lands, use of herbicides and pesticides, opportunities for more noise free recreation, and burning of slash on steep slopes need to be discussed.

Response. The RARE II environmental statement primarily addresses alternatives for allocating inventoried roadless areas. As pointed out in the draft and reiterated in the final statement, management policies applied to National Forest System lands are not an issue. They are beyond the scope of land allocation decisions. Discussion under separate resource headings and the addition of sections on herbicides, noise, and environmental amenities elaborate further on these issues.

Placing roadless areas in the further planning category will not allow for additional knowledge to be gained of the mineral and energy resource under current management constraints.

Response. The Forest Service has recognized the restrictions placed on acquisition of knowledge about the most critical of these resources - oil and gas. Management policy is being revised to permit gathering additional data on oil and gas. The policy addresses issues of permitting access for exploration and leasing of these vital resources in areas allocated to further planning. Refer to page 98 for stipulations regarding exploration and leasing of these resources.

52. Comment. The draft environmental statement attempts to accomplish too many things. It attempts to establish alternative approaches to decisionmaking, to set

wilderness goals, to evaluate and compare roadless areas, and to make allocations of roadless areas without offering alternatives for any but the final selection.

Response. The goal of RARE II is to allocate inventoried roadless areas. To accomplish this goal, alternative approaches to decisionmaking were essential. Options were made available for public review. Criteria for making the decisions were also presented. Comment received from the public on these items was used to propose RARE II decisions. Wilderness goals or the amount of roadless acreage to recommend for wilderness result from public response to criteria and site specific allocation of individual areas. Evaluation and comparison of areas are based on ratings of their wilderness attributes, potential resource outputs, development opportunity, and other factors displayed in the draft statement. To display any less information than this would not provide for a decision. The environmental statement had to consider all factors involved in the process, present them for public response, and then achieve oft-stated goals of RARE II. Decisions could not be reached if less than this total approach had been taken.