

CHAPTER 1 PURPOSE OF AND NEED FOR ACTION

Introduction

The Forest Service is responsible for resource use and conservation on all National Forest System (NFS) lands to meet people’s increasingly diverse needs. One common theme in all Agency initiatives is that our **stewardship** should result in a legacy of healthier **landscapes**. The preferred alternative, described in Chapter 2, is the Agency’s recommendation for achieving a balance of use as it relates to future management of **inventoried roadless areas**.¹ By maintaining and restoring the health of our **ecosystems** and watersheds, we can help ensure a safe, healthy, and productive environment today and for future generations.

Inventoried roadless areas account for approximately 58.5 million acres,² or roughly a third of all NFS lands (Figure 1-1 and Appendix A). Although inventoried roadless areas comprise only 2% of the land base in the continental United States, they are found within 661 of the more than 2,000 **major watersheds** in the nation (U.S. EPA 1997, Sedell and others 2000). These areas provide clean, fresh water to millions of people, and important habitat to numerous fish and wildlife species.

One of the primary reasons for establishment of the national forests and grasslands was to “secure favorable conditions of water flows” (Organic Administration Act 1897). Many communities across America depend on the clean water that originates in or flows through inventoried roadless areas and into facilities that treat and distribute water for drinking and other uses (U.S. EPA 1997, Sedell and others 2000, Elliot in press). Because inventoried roadless areas remain largely undisturbed, it is less likely that erosion, **sedimentation**, and disruption of water flows will occur in those locations.

Lakes, streams, and rivers within inventoried roadless areas can also function as **biological strongholds** for many fish species. These considerations are particularly important given the wide range and broad decline of species such as salmon, steelhead, bull trout, native cutthroat trout, and other aquatic species that depend on habitat in NFS lands for their continued survival. Numerous studies show that watersheds with fewer **roads** are often associated with healthier fish populations, and roads may have unavoidable effects on streams, regardless of how well they are located, designed, or maintained (USDA Forest Service and USDI Bureau of Land Management 1995).

Inventoried roadless areas also support a diversity of aquatic and terrestrial habitats, species, and communities. These areas provide habitat for or affect more than 220 **threatened, endangered, and proposed species (TEP)** and 1,930 **sensitive species**.

¹ Words and phrases defined in the Glossary are shown in bold typeface the first time they appear in each chapter.

² This figure has been revised from the 54.3 million acres shown in the DEIS. Refer to Comparison of Alternatives in Chapter 2 (p. 2-23) for an explanation of the factors involved. All acreage figures include the Tongass National Forest unless specified otherwise. Minor discrepancies among figures cited in the text, tables, or database are due to rounding.

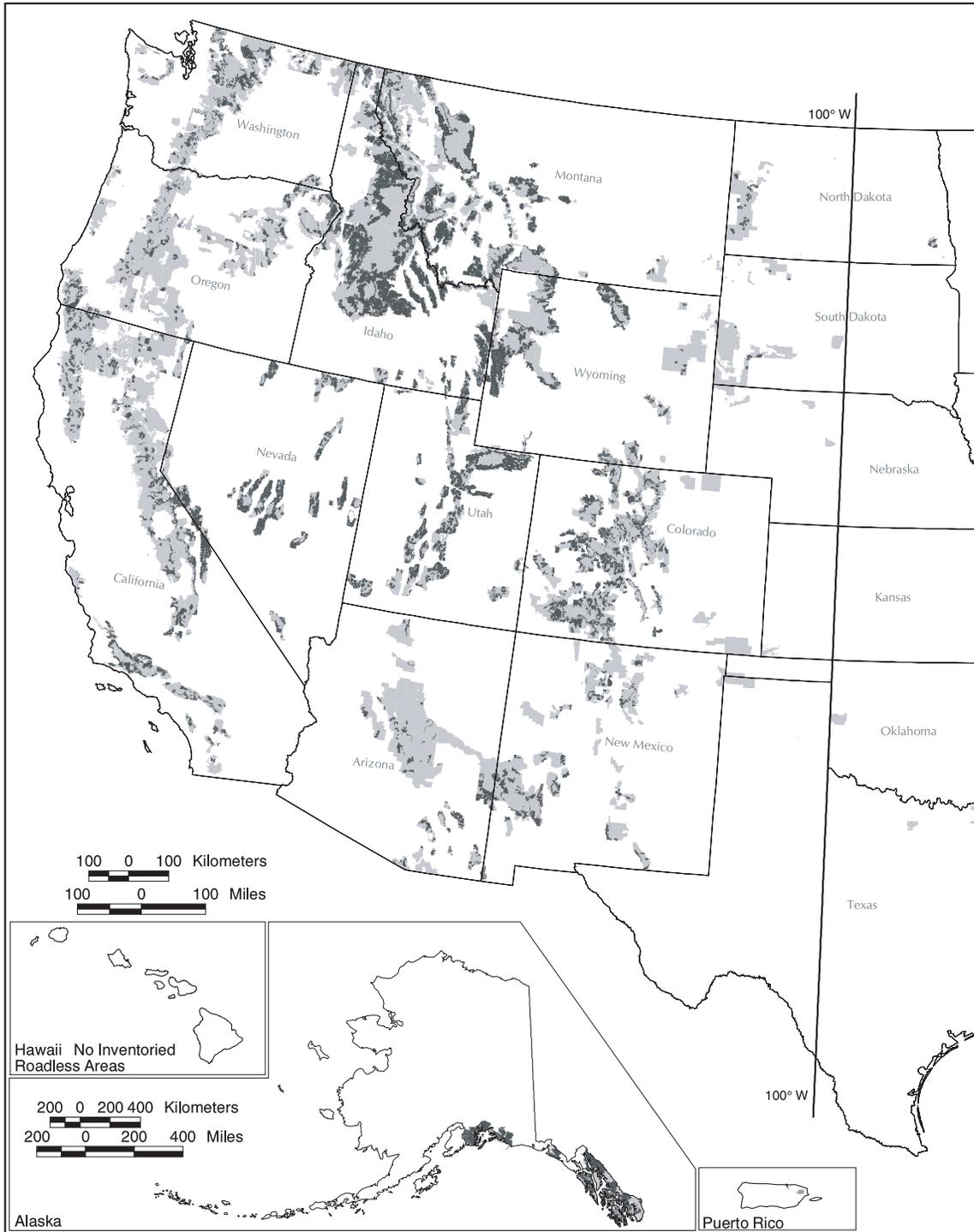


Figure 1-1a. Inventoried roadless areas on National Forest System lands, Western United States.³

³ Acreage summaries of the inventoried roadless areas are included in Appendix A. Detailed maps of the areas included in this proposal are displayed in Volume 2 of this FEIS, and are also available at the Forest Service website (roadless.fs.fed.us). The maps included in both volumes were compiled from the best available geospatial data. For a list of data sources used in their preparation, please refer to "Roadless Database References" in the References Cited section.

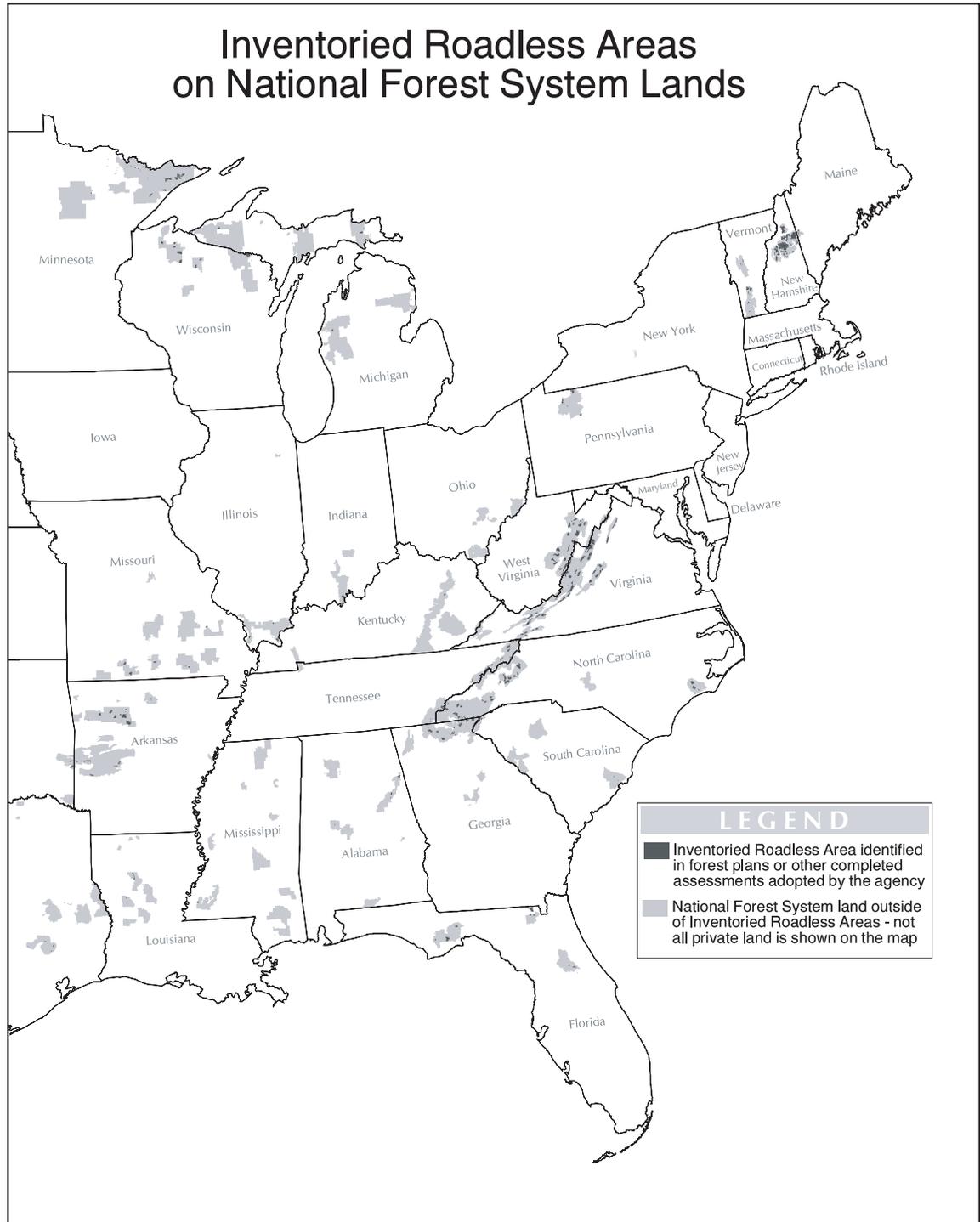


Figure 1-1b. Inventoried roadless areas on National Forest System lands, Eastern United States.

As with aquatic species, inventoried roadless areas function as biological strongholds and places of refuge for many terrestrial animal species from wide-ranging large mammals, such as grizzly bears, to narrowly distributed bird species, and other small animals such as snails. As such, these areas play an important role in helping to conserve native plant and animal communities and **biological diversity**. When roads divide large landscapes

into smaller patches, populations may become isolated from each other. This reduces genetic mixing, which is necessary for species diversity and health (Noss and Cooperider 1994). In evaluating 91 vertebrate species in the Interior Columbia Basin, Wisdom and others (2000) found that factors associated with roads negatively affected over 70% of those species. These negative effects include loss of large trees and logs needed by cavity dependent birds and mammals, direct and indirect species mortality, and reductions in breeding productivity.

Inventoried roadless areas also provide large, relatively undisturbed blocks of habitat for a wide variety of native plants. Competition by **nonnative invasive species** is one of the leading reasons that native plant species are listed as endangered or threatened. Relative to roaded areas, native plant communities in inventoried roadless areas are more intact because nonnative species, which often spread through **road construction** and use, are less likely to be introduced or become established.

These same areas also provide people with unique recreation opportunities. When activities such as hiking, camping, hunting, wildlife viewing, and cross-country skiing take place in areas with roads, the experience will include more interactions with people, more sights and sounds of development, and more restrictions. Recreation in inventoried roadless areas produces experiences that are usually difficult to replicate in roaded areas.

The Forest Service is the single largest provider of outdoor recreation opportunities in the United States, and the demand for most recreation activities is growing (Cordell and others 1999b). However, the land available for outdoor recreation (**dispersed recreation** in particular) is dwindling, and will continue to decline as development encroaches upon available open space. Between 1992 and 1997, nearly 16 million acres of non-Federal forest, cropland, and open space were converted to urban and other uses. This is twice the rate of the previous 10 years in the United States (Natural Resource Conservation Service, NRI Inventory, 1982-1997).

President Clinton emphasized the value of lands without roads at the George Washington and Jefferson National Forest on October 13, 1999:

“Within our national forests there are large parcels of land that don’t contain roads of any kind, and in most cases, never have...these areas represent some of the last, best, unprotected wildland anywhere in our nation. They offer unparalleled opportunities for hikers, hunters, and anglers. They’re absolutely critical to the survival of many endangered species...and I think it’s worth pointing out they are also very often a source of clear and fresh water for countless communities.”

Inventoried roadless areas provide clean water, biological diversity, healthy forests, and recreation opportunities. The United States Department of Agriculture (USDA) Forest Service has prepared this final environmental impact statement (FEIS) to analyze alternatives that would conserve and protect the important values and characteristics of these areas.

Background

In 1972, the Forest Service initiated a review of NFS **roadless** areas larger than 5,000 acres to determine their suitability for inclusion in the National Wilderness Preservation System. The second and final review process, known as Roadless Area Review and Evaluation II (**RARE II**), resulted in a nationwide inventory of roadless areas. In the 21 years since the completion of RARE II, Congress has designated some areas as Wilderness. Additional reviews have been conducted through the land management planning process and other large-scale assessments. The 58.5 million acres of inventoried roadless areas used as the basis for this analysis are the result of both RARE II and these assessments.

On many national forests and grasslands, roadless area management has been a major point of conflict in land management planning. The controversy continues today, accompanying most proposals to harvest timber, build roads, or otherwise develop inventoried roadless areas. The volume of appeals, litigation, and congressional debate over the last 20 years illustrates the importance that many Americans attach to the remaining roadless portions of NFS lands.

Integral to the debate over inventoried roadless areas is the dispute over management of the extensive Forest Transportation System. Millions of dollars are required each year to maintain roads to Federal and State safety and environmental standards. Many people inside and outside the Forest Service question the wisdom of building new roads, particularly in inventoried roadless areas, when each year's uncompleted maintenance increases the backlog as existing roads deteriorate and the cost of repair continues to rise.

A 1998 survey of **road maintenance** and capital improvement needs within the Forest Service showed that the Agency has an \$8.4 billion backlog in deferred maintenance, **road reconstruction**, and bridge and culvert maintenance and replacement on the more than 386,000 miles in the Forest Transportation System (USDA, Forest Service 1999h). Recent updates to the inventory used in this survey suggest that these figures are conservative, and will increase as better data is collected and validated. The Forest Service receives less than 20% of the funding needed to maintain its existing road infrastructure, so the backlog grows greater every year. In addition, the Agency conservatively estimates that 60,000 miles of unauthorized and **unclassified roads** exist on NFS lands, creating additional safety and environmental problems as the roads deteriorate from use and lack of maintenance.

To respond to these concerns, in January 1998, Forest Service Chief Mike Dombeck proposed to temporarily suspend road construction and reconstruction in certain **unroaded areas**, and provided advance notice of revisions to the regulations governing the management of the Forest Transportation System. After analyzing public comments on the proposal, the Agency published *Administration of the Forest Development Transportation System: Temporary Suspension of Road Construction and Reconstruction in Unroaded Areas; Interim Rule; 36 CFR Part 212; 64 Federal Register 7290; February 12, 1999* (also known as the Interim Roads Rule).

The Interim Roads Rule suspended road construction and reconstruction in certain inventoried roadless areas for 18 months (March 1999 through August 2000), while a long-term forest transportation policy was developed. Publication of the final Roads Policy is expected in Fall 2000. During the public comment period for the Interim Roads Rule, the Agency received approximately 119,000 public comments, many of which mentioned the need for “permanent protection” of inventoried roadless areas.

In his memorandum to the Secretary of Agriculture dated October 13, 1999, President Clinton provided direction to the Forest Service stating:

“I have determined that it is in the best interest of our Nation...to provide strong and lasting protection for these forests...Specifically, I direct the Forest Service to develop, and propose for public comment, regulations to provide appropriate long-term protection for most or all of these currently inventoried “roadless” areas, and to determine whether such protection is warranted for any smaller “roadless” areas not yet inventoried.”

The Forest Service is addressing management of existing roads, inventoried roadless areas, and other unroaded areas in three separate rulemaking efforts. The first, management of the existing road system on NFS lands, is addressed in the *National Forest System Road Management and Transportation System; 36 CFR Parts 212, 261, and 295, and Associated Forest Service Manual 7700 Revisions; 65 Federal Register 11676*, (collectively known as the Roads Policy). The Roads Policy shifts the emphasis from building new roads to a system that supports management activities in an environmentally sound and affordable way.

The second rulemaking, the proposed Roadless Rule (*Special Areas; Roadless Area Conservation; 36 CFR Part 294; 65 Federal Register 30276; May 10, 2000*) described in the Draft Environmental Impact Statement (DEIS), had two parts:

- Prohibitions that precluded road construction and reconstruction in most inventoried roadless areas; and
- Procedures that required evaluation of the quality and importance of **roadless characteristics**;⁴ and a determination of whether and how these characteristics should be conserved during land management plan revision in the context of overall multiple-use objectives.

It also proposed postponing a decision regarding conservation of inventoried roadless areas located on the Tongass National Forest until April 2004.

The third, and recently completed, rulemaking effort is the *National Forest System Land and Resource Management Planning Rule (36 CFR Parts 217 and 219)*, also known as the Planning Regulations. The Planning Regulations provide direction for implementing the National Forest Management Act (NFMA) in a way that addresses ecological, economic, and social sustainability, including procedures for roadless area protection.

⁴ These characteristics are described starting on page 3-3.

Public Review and Comment on the Draft EIS and Issues Considered

The Notice of Intent (64 FR 56306, October 19, 1999) to prepare these regulations to conserve inventoried roadless areas drew about 16,000 people to 187 public meetings, and elicited more than 517,000 responses by the time the DEIS was published. On May 10, 2000, the proposed Roadless Rule and DEIS were released for public review, initiating a comment period that closed July 17, 2000. Public involvement during the comment period was designed to accommodate the already high level of nationwide interest in the proposal.

Maps, brochures, and other information were developed to address public concerns and questions. Before release of the proposal, news releases and letters were sent to news media, other government agencies, libraries, and Forest Service units to explain how to obtain the DEIS and proposed Roadless Rule in a variety of electronic and printed formats. The proposed action and other alternatives, background information, and a schedule of public meetings were posted at the internet site specifically designed to obtain public input: (**roadless.fs.fed.us**). Forest Service personnel across the country were briefed and informed so they could discuss the proposal and its impacts with their local publics.

The Forest Service hosted two cycles of public meetings during the comment period – one for information sharing and discussion, the other to collect oral comments from those who wished to speak for the record. More than 430 meetings were held. About 230 meetings were held for the purpose of sharing information on the DEIS and proposed Roadless Rule. More than 200 additional meetings were held to hear public comment. Many units held daylong or double sessions so that all commenters could speak. Additional sessions in Texas, and even one session in Hawaii, were scheduled as a result of public requests. Meetings were held in every Forest Service region and in Washington, DC. Every national forest and grassland office with affected inventoried roadless areas hosted at least two meetings, and those locations with high public interest hosted more.

The meetings drew more than 23,000 people nationwide. About 7,000 attended information meetings and about 16,000 attended comment meetings. At the comment meetings, 45% of the attendees, nearly 7,000 people, chose to speak. Written public comments were also collected at the meetings, by postal and electronic mail, and by telefax. By the end of the official comment period on July 17, responses totaled about 1,155,000. This included about 1 million postcards or other form letters; 60,000 original letters, 90,000 electronic mail messages, and several thousand telefaxes.

All responses were sent to the Content Analysis Enterprise Team (CAET). This is a team of Forest Service employees that specializes in content analysis of public comments. They objectively compile, organize, analyze, and summarize the full range of viewpoints and concerns received about a proposal. As CAET categorized and summarized the public comments on the DEIS, they sent this information to the Forest Service Roadless Team. A summary of the comment analysis process, along with the Agency's responses showing how the comments were used to clarify and adjust alternatives or the technical analysis in the FEIS, are provided in Volume 3 – Agency Responses to Comments.

Respondents to the Roadless Rule and DEIS generally expressed two very different sets of strongly held values and viewpoints (Content Analysis Enterprise Team 2000b). To broadly summarize, one group believes roadless areas should be conserved for their intrinsic values and for benefits to humans. In their view, roadless areas should be allowed to evolve naturally through their own dynamic processes, although some proponents would condone very limited stewardship activity. The other group generally identifies with the land through forest product-dependent industries, motorized recreation (either by preference or need, based on age or disability), or through the public land management profession. They express the view that these ecosystems, with active and prudent management, can provide many benefits for humans and wildlife.

One group stresses that human desires for forest products and some uses must be secondary to human needs for a healthy environment, both locally and globally, for quiet natural places, for spiritual and mental regeneration, and to meet the needs of other living things. They believe the needs of forest-dependent users can be met through retraining, restoration-related employment, and by designating less sensitive areas for motorized recreation.

Most of these proponents say the proposed rule identified in the DEIS does not go far enough. They believe the final rule should immediately prohibit **timber harvest**, other commodity uses, and motorized recreation on roadless areas 1,000 acres or larger, and should not defer conservation of these areas to future land management planning processes. They also stress that the Tongass National Forest should be included immediately in this conservation effort.

The other group stresses that maintaining a healthy environment should not preclude resource production, motorized access, and **developed recreation** opportunities. These commenters see the forest as an ecosystem capable, under proper management, of providing people with a host of goods and services, and numerous recreational opportunities. They believe conservation requires active land management. To this group, **active management** means roads for fuelwood **thinning**, insect and disease treatment, resource use, and development of recreation facilities. This viewpoint stresses that failure to actively manage forests and grasslands could result in threats to human livelihoods and increased insect infestations and uncharacteristically severe fire, while prudent management would benefit people and wildlife.

The two viewpoints are separated by a difference in perceptions and values regarding the fundamental nature and role of public lands. However, there are also differences in their perceived relationships with the Forest Service and in the role of government. Respondents who feel the rule goes too far express resentment over a perceived condescending attitude by environmental groups. These commenters feel discriminated against and disenfranchised. They believe their voices do not count, that the only voices that do count are those of the environmentalists. They see national directives as an assault on their freedom. Many believe the government has imposed too many restrictions on the American people already. They believe the proposed rule will be the start of more closures. Often these commenters do not oppose the proposed rule because of what it actually proposes to do, but rather because they perceive it would institutionalize or initiate further restrictions.

Those favoring roadless conservation do not express the same level of distrust toward land management agencies or toward government involvement. They believe only a national directive will adequately protect these lands. These respondents fear that local managers will sacrifice roadless values to influential, local commercial interests. They often distrust local forest management more than national level management. Without a centralized directive requiring local forest managers to conserve roadless areas, they believe these areas will not be protected.

Respondents expressed these competing views within the context of several broad categories. The Forest Service summarized the comments received during the scoping process under six major headings. An analysis of the public comments received during the DEIS comment period indicated that the following major issue categories remain valid.

- 1) Public access;
- 2) Identification of other unroaded areas;
- 3) Exemptions and exceptions;
- 4) Environmental effects;
- 5) Local involvement; and
- 6) The effect on communities with strong natural resource affiliations (forest dependent communities).

These issues have been used to guide this process in one or more of the following ways:

- To determine the scope of the proposal (type of decision to be made);
- To develop a range of alternatives;
- To direct the analysis of potential environmental, social, and economic effects;
- To identify possible mitigation measures; and
- To ensure that the Agency is operating within legal authorities.

More specific statements of public concern and the Agency's responses are presented in Volume 3. Representative quotations from both the Notice of Intent scoping period and the DEIS comment period are included below to provide a sense of the public's response.⁵ After public comments on the DEIS were evaluated, decisions about identification and management of other unroaded areas were incorporated in the final Planning Regulations.

1) Public Access: Some respondents stated that limiting access in roadless areas, including off-highway vehicle (OHV) use, is appropriate and long overdue, and that the resultant effects on these activities are acceptable when weighed against the perceived benefits of reduced access. Perceived positive effects of the limitations include:

- Maintaining habitat for fish and wildlife;
- Buffers against invasive species;
- Protection of drinking water supplies;
- More opportunities for dispersed non-motorized recreation; and
- Reduced noise and resource degradation from motorized recreation.

⁵ Detailed information on the public comments is contained in the Roadless Area Content Analysis Report, and at the Forest Service Roadless website (roadless.fs.fed.us).

“Exclude ORVs from roadless and unroaded areas. ORVs contribute to disturbance of sensitive wildlife, pollution of streams through erosion, and disturbance of non-motorized recreation.” (NOI Response #43634, Individual, Prescott, AZ)

“It is time for public lands to be preserved for future generations, even if this means limiting access to people like myself who have a disability and cannot hike (old polio) like they once managed to do.” (DEIS Response #1321, Individual, Waynesville, NC)

Others felt that limiting road construction and reconstruction or other management actions in roadless areas might restrict the delivery of goods, services, and activities that these areas might otherwise provide. Perceived negative effects include:

- Reduced ability to adequately protect public health (natural disaster response, hazardous waste removal, smoke management), safety (**fire suppression**, property protection, search and rescue), and law enforcement;
- Restricted access to private lands and **inholdings**;
- Limited use by persons with disabilities; and
- Restricted use or increased cost of off-road vehicle and other motorized recreation, ski area development, and commodity activities such as timber harvest, livestock grazing, and oil and gas development.

“The public managers should manage our land, not lock it up and lock us out. They should continue to be business partners with timber, mining, grazing, and other users. They should protect our lands and commodities by using them wisely and rebuilding damaged areas.” (NOI Response #40893, Individual, Lakewood, CO)

“We believe that the American people are entitled to reasonable access to their national forests, regardless of the management prescription assigned to the land within the forest boundary. After all, even Designated Wilderness, the most restrictive of prescriptions, includes the direction that Wilderness Areas shall be managed for the use and enjoyment of the American people. We also believe it is the responsibility of your Agency to provide that reasonable access, and to discourage exclusive use of our national forests.” (DEIS Response #3830, Wise Use or Land Rights Organization, Billings, MT)

2) Identification of Other Unroaded Areas: The public suggested various criteria and processes for addressing the protection and management of other unroaded areas. These areas were considered under the procedural Alternatives A through D in the DEIS. Since the close of the DEIS comment period on July 17, the Agency determined those requirements were more appropriately addressed in the 36 CFR 219 Planning Regulations. Comments received on the DEIS about the procedures were shared with the Planning Regulations team, and were incorporated into that rulemaking.

3) **Exemptions and Exceptions:** Respondents expressed considerable disagreement over allowing geographic exemptions from the proposed action or activity exceptions, such as public health and safety and mineral leasing activities, to the prohibitions. Some feel exemptions similar to those in the Interim Roads Rule for the Tongass National Forest, the area of the Northwest Forest Plan, and other completed planning efforts are appropriate. Others feel no exemptions or exceptions are appropriate for an action of this significance, and that the proposed action should apply equally to all NFS lands. Still, others believe a transition period should be allowed for those forests with recently revised plans.

“Issue a nationwide directive that immediately prohibits road building and logging in all national forest roadless areas. Please do not allow areas such as the Tongass National Forest, forests covered by the Northwest Forest Plan or unsold roadless area timber sales to be exempted.” (NOI Response #41228, Individual, Corvallis, OR)

“The proposed policy should not apply to the Tongass for the additional reason that the forest has recently updated its Land Management Plan, and the plan has carefully considered the effects of any new road construction.” (NOI Response #18244, Individual, Anchorage, AK)

“I urge you to issue a final policy that provides for exemptions or waivers.” (DEIS Response #4903, Individual, Great Falls, MT)

“Maintain Alternative 2 in the DEIS, but exempt from the prohibition national forests within the coverage of the management directives established in the Interior Columbia Basin Ecosystem Management Project.” (DEIS Response #18645, State Elected Official, Boise, ID)

4) **Environmental Effects:** Many respondents commented on the type and degree of physical and biological resource impacts that could be expected from the proposed action. Perceived positive effects include:

- Water Resources: high levels of water quality, compliance with State water quality standards, consistent quantity delivery, runoff timing that maintains base flows, reducing flood peaks, and lowering water treatment costs for local communities;
- Soil Resources: maintenance of soil loss/sedimentation rates within normal ranges, and continued levels of soil quality and productivity;
- Air Resources: high levels of air quality and maintenance of visibility goals;
- Biodiversity and Wildlife/Fisheries: reduced habitat **fragmentation**, resulting in maintenance of **connectivity** and biodiversity, protection of species’ strongholds and **viability**, and maintenance of quality stream habitat;
- Nonnative Invasive Species: reduced opportunities for introduction of non-native invasive plant and animal species, resulting in maintenance of native plant and animal communities;
- Threatened, Endangered, and Proposed Species: reduced levels of habitat **disturbance**, resulting in more protection, greater likelihood of recovery, and fewer listed species;
- Forest Health: greater acreages with limited development opportunities, resulting in intact healthy forests; and
- Fire Prevention: reduced occurrence of accidental person-caused fires and arson fires, resulting in fewer acres burned.

“Watershed condition should be our primary concern. Prevent uses that are contributing to their detriment, and then permit only limited access into country based on its need to accomplish quality resource management; [This should be] spelled out in a forest management plan that has had full public participation in its adoption.” (NOI Response #20101, Individual, Internet email)

“More importantly, these roadless areas have become critical habitat for a myriad of endangered species and other wild creatures that require undisturbed areas in order to complete their life cycles. You must take stronger action to protect these areas.” (DEIS Response #1621, Individual, Sonoma, CA)

Perceived negative effects include:

- Fuel Management: prohibiting road construction may limit managers’ abilities to reduce fuel loadings on landscapes prone to uncharacteristic wildfire effects;
- Fire Suppression: prohibiting road construction may hamper fire suppression efforts, resulting in uncharacteristic wildfire effects;
- Forest Health: prohibiting road construction may limit available options to manage insect, disease, and other **forest health** problems; and
- Use Shifts: limiting various land uses in roadless areas may shift use to other roaded Federal land or onto other ownerships.

“The draft EIS must address and provide specific management alternatives that provide for road construction on national forest lands particularly vulnerable to catastrophic wildland fire...[it] must address the social, economic, and environmental consequences on forest health, forest management options, fire prevention and suppression activities.” (NOI Response #13205, Elected County Official, Markleeville, CA)

“Another concern I have is the weed control and the control of the pine beetle on the national forests. Canadian thistle alone is taking over much land and if it isn’t controlled, will take everything. Leafy spurge and Hounds Tongue are also noxious weeds needing control. These areas need access to control problem areas.” (DEIS Response #597, Individual, Newcastle, WY)

5) Local Involvement: Respondents disagreed on the effect of the proposed action on local involvement in decision-making. Some feel the proposed action would reduce local involvement, with the following effects:

- Negate collaboration agreements on land management plans and local projects; and
- Undermine trust between the Agency and local citizens, business, and elected officials.

“One national decision does not adequately address the unique conditions of each roadless area. I strongly oppose a unilateral decision to “Protect” all roadless areas, which is the obvious intent of this rulemaking process. Decisions on roadless areas must be made at the local National Forest level.” (NOI Response #29213, Individual, Colville, WA)

“Local level forest planning has worked in developing forest plan decisions by the people most knowledgeable about the forestlands. The proposed one size fits all proposal undermines the cooperative dialogue that takes place during each forest plan revision and cancels out years of hard work and studies.” (DEIS Response #6353, Individual, Indian Mound, TN)

Others believe the failure of local planning to resolve the long running and controversial roadless debate lends itself to national resolution. It is thought that once the larger issues are resolved, the remaining issues can be more successfully resolved at the local level.

“We are in complete agreement with this Forest Service rulemaking initiative that will result in the protection and management of unroaded values on inventoried as well as uninventoried lands within the National Forest System.” (NOI Response #49422, State Agency, Jefferson City, MO)

“The four Procedural Alternatives are flawed because they all leave the future management of roadless areas in the hands of local Forest Service Administrators. This simply leaves the door open for confusion and mismanagement. What administrators need is a uniform set of guidelines with clear, strong protections for roadless areas.” (DEIS Response #11425, Individual, Portland, OR)

6) Forest-Dependent Communities: Many of those who commented believed that the proposed action would have significant impacts, both economically and socially, on local communities that depend economically on NFS lands. Perceived negative effects include:

- Lost job income, and related indirect effects;
- Reduced employment opportunities; and
- Reduced payments to counties in lieu of taxes, with effects on local schools and infrastructure.

“Rural economies already suffer from the recent drastic decreases in available sale quantities of timber by decreased job availability, decreased dollar turnover from the logging industry, and increased unemployment.” (NOI Response #41223, Individual, Robertson, WY)

“It is very clear that the USFS has not considered the economic impact of the proposed rule on mining revenues in areas where the proposed rule would increase the cost of mineral extraction beyond the return of the market prices for the minerals. Since the state of Nevada's and many rural counties' budgets in Nevada depend upon taxes on mining to support their budgets, there must be analysis for impacts on mining and local economies which depend on mining that is equal to or better than the economic impact analysis supplied in the DEIS and cost-benefit analysis for logging communities potentially affected by the proposed rule.” (DEIS Response #44188, Individual, Reno, NV)

Others believe these effects would be limited, and that local communities can rapidly offset such effects with other employment and income opportunities generated through conservation of roadless areas and the values they represent. Perceived positive effects include:

- Clean drinking water;
- Less erosion;
- Healthy wildlife and fish habitats;
- Maintenance of attractive landscapes;
- Increased tourism and related new businesses; and
- A broader, more diverse business environment.

“Maintaining the resource creates more stable economies than the typical boom-bust cycle of resource extraction. Much of the decrease in jobs in the area is not a result of environmental protections, but because of automation and dwindling of the resource.” (NOI Response #60593, Individual, Takoma Park, MD)

“The effect of prohibiting roadless area timber sales on the timber industry and employment would be minimal. Forgoing the entire 220 million board feet of annual timber sale offering in roadless areas over the next five years would result in only 7% reduction in the Forest Service’s planned timber sale program. The impact on total U.S. timber production, which averages about 83 billion board feet per year, would be miniscule – about ¼ of 1%. Similarly, the DEIS estimates that a prohibition on roadless area logging would theoretically result in a loss of just 820 timber jobs, which is 3% of all national forest-based direct timber jobs and less than one-tenth of 1% of all U.S. wood products employment.” (DEIS Response #55101, Environmental/Preservation Organization, Eugene, OR)

Purpose and Need

The purpose of this action is to conserve and protect the increasingly important values and benefits of roadless areas by: 1) prohibiting activities that have the greatest likelihood of degrading desirable characteristics of inventoried roadless areas and 2) ensuring that ecological and social characteristics of inventoried roadless areas are identified and evaluated through local land management planning efforts.⁶

Given the history of controversy surrounding the management of inventoried roadless areas and the level of interest expressed by the public, the Agency has determined that there is a need for national-level direction for roadless area management. The Forest Service developed a proposed action and several alternatives in the DEIS with the intent of meeting the need to protect the values prevalent in inventoried roadless areas.

This action is needed because:

- Road construction, reconstruction, and timber harvest activities in inventoried roadless can directly threaten the fundamental characteristics of these areas by altering natural landscapes, including habitat fragmentation and changes in native plant and animal communities;

⁶ This part of the need for action has since been addressed in the final Planning Regulations. See page 1-16.

- Budget constraints permit only a small portion of the Agency road system to be effectively managed; and
- National concern over roadless area management continues to generate controversy, including costly and time-consuming appeals and litigation.

Local land management planning efforts may not always recognize the cumulative national significance of inventoried roadless areas and the values they represent, especially given the increasing development of the nation's landscape. Urbanization, reduction in the size of forest tracts, habitat fragmentation, and other forest **ecosystem health** issues are concerns at local, regional, national, and global levels. When managing inventoried roadless areas, it is important to recognize that decisions made at finer scales (that is, project, watershed, or forest level), must be considered in a broader context. While individual decisions to build roads may achieve local management objectives, collectively they may result in a continued net loss of the quality and quantity of inventoried roadless areas nationally.

Regardless of how well informed individual decisions may be at the local level, any new road building in inventoried roadless areas still results in a loss of **roadless characteristics**. When local officials evaluate the impacts of their decision to build a road into an inventoried roadless area, the incremental effect of the decision is considered. However, when these individual decisions are aggregated over time, and throughout the country, the resulting ecological and social outcomes resulting from the loss of roadless areas may become substantial.

Even though 24.2 million acres (41%) of inventoried roadless areas currently have land management plan **prescriptions** that prohibit road construction, these prescriptions are subject to change at the next plan revision. The prohibitions presented in this FEIS would elevate the certainty of long-term protection for all inventoried roadless areas.

The Notice of Intent and public comments received during scoping, set the stage for determining the range of actions the Agency would consider in addressing these concerns in the proposed rule, other alternatives, and in the effects analysis. Subsequent comments on the DEIS have been used to reexamine the appropriateness of the scope and scale of the analysis, refine the alternatives, and develop mitigation measures.

The process for determining the scope of the environmental analysis and alternatives included a review of factors such as complexity of analysis, urgency of the issue, national applicability, level of public interest, and relationship to other regulatory or administrative mechanisms. The Agency considered a full range of activities that might occur within the proposal, such as road construction, timber harvest, motorized recreation, grazing, and other activities that might affect the national significance of roadless area characteristics. After careful review of public responses to both the Notice of Intent and the DEIS, the Agency determined that it was appropriate to consider prohibiting some activities through national rulemaking. Furthermore, the Agency determined that only those uses and activities likely to significantly alter landscapes, including habitat fragmentation and changes in native plant and animal communities on a national scale, would be considered for prohibition in this proposal.

As a result of this review, the Agency decided to analyze a range of alternatives to limit road construction, reconstruction, and timber harvest, because these activities:

- Occur on forests and grasslands throughout the nation;
- Have the greatest likelihood of altering landscapes;
- Often cause substantial landscape fragmentation and adverse changes to native plant and animal communities; and
- May result in immediate, irretrievable, and long-term loss of roadless characteristics.

Timber harvest and access for fire suppression has historically generated the need for most road construction on NFS lands. Furthermore, these activities occur throughout the National Forest System. Other activities identified by the public, such as motorized vehicle use, grazing, mining, and developed recreation facilities, were determined by the Agency to either not pose the same level of national risk for adversely impacting inventoried roadless areas, as do road construction, reconstruction, and timber harvesting, or the impacts are not as widespread. This same holds true for utility corridors, power lines, pipelines, water developments, and other special uses.

Another reason for not addressing certain uses and activities at the national level is that they are either not directly permitted by the Agency, or they cannot be effectively analyzed at the national level because the level of activity is unknown and therefore impacts to roadless characteristics are uncertain. For example, data on the use of motorized vehicles and their impact to inventoried roadless areas are not collected consistently throughout the National Forest System. It is currently not possible to display the effects of prohibiting such use in inventoried roadless areas at a national level.

As a result, in the DEIS the Agency proposed to develop procedures to evaluate and conserve roadless characteristics during land management plan revisions (procedural Alternatives A through D). Analysis of comments on the DEIS for the Roadless Rule showed that there was confusion about how the procedural alternatives would be implemented. Public comments on the proposed Planning Regulations and Agency comments on the DEIS also suggested that the procedures for roadless area protection were best suited for the Planning Regulations. Upon review, most of the roadless area characteristics identified in the DEIS and proposed Roadless Rule were similarly required by the Planning Regulations. Therefore, the Forest Service determined that the procedures contemplated in the Roadless Rule should be an explicit part of the plan revision process, and addressed them at 36 CFR 219.9(b)(8) of the final Planning Regulations. By making small changes to the Planning Regulations, the procedural alternatives discussed in the DEIS were not needed as a part of the Roadless Rule and were removed from this FEIS.

The Notice of Intent identified the Tongass National Forest as deserving special attention in formulating alternatives. Public responses to the DEIS confirmed the importance of this issue in the analysis process. The Tongass National Forest is unique among national forests for the following reasons:

- The Tongass National Forest Land and Resource Management Plan was revised in 1999, leading to 82% of the forest having land use designations that prohibit or limit road construction and reconstruction;
- The Southeast Alaska economy continues to change from dependence on long-term Forest Service **timber sale** contracts to competitively bid timber sales;
- Two-thirds of the total timber offer planned on the Tongass National Forest over the next 5 years is in inventoried roadless areas; and
- Consideration of the requirements of the Tongass Timber Reform Act.

The Agency determined it was necessary to address the Tongass National Forest separately because of these unique social and economic conditions.

Decision to be Made

The Forest Service has decided to examine possible road construction, reconstruction, and timber harvest restrictions in inventoried roadless areas at the national level. The Forest Service also decided to examine the unique situation of roadless area management on the Tongass National Forest. The decisions to be made by the **responsible official** include:

- Should road construction, reconstruction, and timber harvest be prohibited in National Forest System inventoried roadless areas?
- Should the proposed national prohibitions be applied to the Tongass National Forest or modified to meet the unique situation on the Tongass?

In this context, the Forest Service developed and analyzed the effects of various alternatives (refer to Chapters 2 and 3). The final Roadless Rule will either be the same as the preferred alternative described in Chapter 2, or it will be modified based on the other alternatives and on public comments summarized in Volume 3. The final Roadless Rule will be documented in a Record of Decision, and the final rule published no sooner than 30 days after the Notice of Availability of the FEIS appears in the Federal Register.

The Proposed Action

The Agency's original proposed action is the proposed Roadless Rule displayed in Appendix A of the DEIS and published in the *Federal Register*. The Forest Service designed the proposed action to achieve the following objectives:

- Prevent activities that can most directly threaten inventoried roadless areas by implementing national prohibitions against road construction and reconstruction;
- Create national procedures that enable local Agency managers to identify, evaluate, and conserve or enhance the characteristics of inventoried roadless areas through the land management planning process;
- Provide opportunities for achieving other multiple-use benefits, such as dispersed recreation, and vegetative treatments to reduce the risk of wildland fire and insect and disease infestations; and
- Accommodate the transition in the timber program in Southeast Alaska under the recent decision on the Tongass National Forest Land and Resource Management Plan.

Based upon public comments on the DEIS and additional internal considerations, the decision was made in the final Planning Regulations regarding the procedural aspects of roadless area conservation. As a result, the Agency has modified the Preferred Alternative which is described in Chapter 2 of this FEIS.

Other Related Planning Efforts

As discussed previously, the Forest Service recently published the final Planning Regulation (36 CFR Parts 217 and 219). While the action proposed here would immediately protect inventoried roadless areas and the increasingly important values and benefits they provide, the Planning Regulations will guide the long-term conservation and management of inventoried roadless areas and unroaded areas (see Table 1-1). In addition to the Roadless Rule and Planning Regulations, the Forest Service has one other directly related ongoing rulemaking effort: the *National Forest System Road Management and Transportation System; 36 CFR Parts 212, 261, and 295, and Associated Forest Service Manual 7700 Revisions; 65 Federal Register 11676*, (collectively known as the Roads Policy).⁷ The three rules are summarized in Table 1-1.

The Planning Regulations implement the National Forest Management Act to address ecological, economic, and social sustainability. They build on the recommendations of an eminent committee of scientists and more than 20 years of experience with land management planning, and provide the overarching framework for implementing the Roads Policy and the Roadless Rule. Specifically, the Planning Regulations:

- Base land management planning on the principles of the interrelated ecological, economic, and social elements of sustainability;
- Require the Forest Service to actively engage the public and other Federal, State, local, and Tribal partners in the management of NFS lands;
- More effectively integrate science into the planning process and require the Agency to manage ecosystems rather than single outputs or outcomes;
- Integrate planning and management activities more closely so that the Forest Service can respond to new information and opportunities in a timely manner; and
- Identify and evaluate roadless areas based on sustainability requirements of the Planning Regulations, and consider protection for inventoried roadless areas and unroaded areas in addition to those protections required by the Roadless Rule, Roads Policy, and other applicable laws and policy.

⁷ Rulemaking is an open, public process that allows government officials to make decisions after due consideration of competing interests. All rulemaking is carried out under existing laws and regulations governing the Forest Service. The authority to promulgate regulations "to regulate the occupancy and use and to preserve the forests thereon from destruction" dates back to the passage of the Organic Act of 1897. Congress elaborated on this responsibility in the Multiple-Use Sustained-Yield Act of 1960, which directs the Secretary of Agriculture to administer the National Forest System to achieve multiple-use and sustained yield of renewable resources without impairment of the productivity of the land (16 U.S.C.528-531). The Secretary has issued regulations for management of forest development roads and trails under 23 U.S.C. 201, 205 (36 CFR Part 212). The Secretary has been granted broad authority to establish such rules as determined necessary and desirable to manage the national forests (16 U.S.C. 1613).

Table 1-1. Comparison of related Forest Service rulemaking efforts.

	Planning Regulations 36 CFR Parts 217 & 219	Roads Policy (proposed) 36 CFR Part 212	Roadless Rule (proposed) 36 CFR Part 294
Proposal	Bases land and resource planning on sustainability. Emphasizes collaboration, integrates science. Planning becomes problem solving. Includes planning direction for consideration of appropriate uses and activities in roadless areas.	Identifies needed and unneeded roads. Gives emphasis to: Rehabilitating needed roads; Decommissioning unneeded roads; Carefully considering adding roads; Integrates road analysis with land management plan revisions or amendments.	Prohibits road construction and reconstruction in inventoried roadless areas.
Focus	Site specific and land management planning within the context of sustainability.	Science-based road analysis at various scales coordinated with ecosystem assessments and public involvement.	Inventoried roadless area conservation.
Applicability	Applies to all NFS lands and resources.	Applies to all NFS lands and resources.	Applies to NFS inventoried roadless areas.
Definitions	Defines <i>inventoried roadless area</i> and <i>unroaded</i> .	Defines <i>road, classified road, unclassified road, temporary road, inventoried roadless area, and unroaded areas</i> .	Uses same definitions as the Planning Regulations and the Roads Policy.
Relationship to Roadless Issues	Provides overall framework for identification and management of unroaded values. Requires consideration of protection for roadless areas during plan revisions.	Provides interim protection for inventoried roadless areas and other unroaded areas until plan amendment.	Proposes conservation and management for inventoried roadless areas.

The Roads Policy for the Forest Transportation System addresses management of existing roads. The proposed Roadless Rule, the subject of this FEIS, addresses inventoried roadless areas. The proposed rule for the Roads Policy is scheduled to be completed in Fall, 2000. The policy is intended to:

- Make the existing **forest road** system safe, responsive to public needs, environmentally sound, affordable, and efficient to manage;
- Be implemented through public involvement and analysis at the local level;
- Implement a scientific analysis procedure to help land managers and the public identify heavily used roads that need to be maintained or upgraded, and roads that are unused or environmentally damaging that can be decommissioned or converted to other uses;
- Place a new emphasis on maintaining and reconstructing existing roads rather than building new roads, given the extensive road system that is already in place in most national forests, and to carefully consider any proposals for new roads; and
- Provide interim protection for inventoried roadless and certain unroaded areas.

All three rules seek to provide long-term environmental sustainability, ensure collaboration with the public, integrate science into planning and management of NFS lands, and incorporate new information and opportunities.

As noted in Table 1-1, the Planning Regulations contain provisions that allow responsible Forest Service officials to consider inventoried roadless areas and unroaded areas as special areas. These regulations also require responsible officials to identify and evaluate roadless areas based on sustainability requirements, and consider protection for inventoried roadless areas and unroaded areas in addition to those protections required by the Roadless Rule, Roads Policy, and other applicable laws and policy. The Planning Regulations also contains criteria for analysis of roadless characteristics.

Completion of the Roads Policy is reasonably foreseeable. It contains interim requirements that provide a temporary level of protection for roadless areas. Until a national forest or grassland has completed a forest-level roads analysis and incorporated it into its land management plan, road building in inventoried roadless areas and specific unroaded areas would require a specific and compelling need, a science-based **local roads** analysis, an EIS, and regional forester approval. While the Roads Policy would provide some interim protection, it would not achieve the same level of certainty as provided by the alternatives in this FEIS, and therefore would not meet the stated purpose and need.

These rules work in a complementary fashion. For example, the prohibition action alternatives in this FEIS, would overlay the compelling need test of the proposed Roads Policy in inventoried roadless area. At the same time, projects that could move forward under an exception in this FEIS would still be subject to the compelling need test and other analyses required by the proposed Roads Policy, while the interim requirements apply. Proposed activities in unroaded areas **contiguous** to inventoried roadless areas, as defined in the proposed Roads Policy, would not be subject to the prohibitions of the Roadless Rule. However, they would still be subject to the compelling need test of the proposed Roads Policy before roads could be constructed or reconstructed.

The Agency has also released for public comment the Draft Forest Service Strategic Plan (draft Strategic Plan), in conformance with the Government Performance and Results Act. The Planning Regulations, Roads Policy, and Roadless Rule are consistent with the draft Strategic Plan, which outlines the long-term goals and objectives that set the course for budgeting and accountability. Additional information may be obtained at the Strategic Planning and Resource Assessment website (www.fs.fed.us/plan/). The following goals and objectives are especially relevant to the proposed action because of their emphasis on ecosystem health including water quality, soil productivity, and habitat integrity:

Goal 1: Ecosystem Health: Promote ecosystem health and protection using a collaborative approach to sustain the nation's forests, rangelands, and watersheds.

- Objective 1.a - Improve and protect watershed conditions to provide the water quality and quantity and soil productivity necessary to support ecological functions and intended beneficial water uses.
- Objective 1.b - Increase the amount of habitat capable of sustaining viable populations of all native species and support desirable levels of selected species.

Goal 4: Effective Public Service: Ensure the acquisition and use of an appropriate corporate infrastructure to enable the efficient delivery of a variety of uses.

- Objective 4.b - Improve the safety and economy of Forest Service roads, **trails**, facilities, and operations, and provide greater security for the public and employees.

Organization of the Document

This FEIS is organized into four volumes.

Volume 1

Chapter 1 Purpose and Need: describes the reasons for proposing and completing this FEIS.

Chapter 2 Alternatives Considered: describes alternative methods of achieving the stated purpose. This discussion includes a range of alternatives, a discussion of other alternatives that were eliminated from detailed study, and possible mitigation measures. Chapter 2 also includes comparisons of these alternatives based on the environmental, social, and economic effects disclosed in Chapter 3.

Chapter 3 Affected Environment and Environmental Consequences: describes the physical, biological, social, and economic environments relevant to the proposed action, and the changes that may occur to those environments as a result of implementing the proposed action or other alternatives. This analysis is organized under several main headings such as Ecological Factors, Human Uses, and Social and Economic Factors. Within each resource section, the affected environment is described first, followed by the No Action Alternative that provides a baseline for evaluation and comparison of the other alternatives that follow.

Chapter 4 Consultation and Coordination: provides an overview of the public involvement process used to develop the FEIS, a list of preparers, and list of agencies and organizations receiving copies of the FEIS.

Appendices: provides more detailed information to support the analyses presented in Chapters 1 through 3. The FEIS also includes a glossary and a list of the references cited.

Volume 2

Volume 2 of this FEIS contains maps of the inventoried roadless areas. A map is provided for each State that contains inventoried roadless areas, followed by detailed maps for each forest or grassland located in that State.

Volume 3

This volume includes a detailed description of the public involvement and comment analysis process, and the Agency's responses to those comments.

Volume 4

Volume 4 includes copies of all letters received from Federally-recognized Tribes, Federal, State, and local agencies and elected officials.

