

1. DATA

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Mapping and Data

1. The maps included with the DEIS are not sufficiently clear or detailed in several respects. For example: they do not clearly delineate the roadless areas, their boundaries, roads within their boundaries, or other landmarks. Some maps in DEIS Volume 2 do not match the web site maps or the display maps at the Forest Service offices.

Response: The Forest Service produced maps using a geographic information system (GIS) for the roadless initiative at the national-, State-, and forest-level. The Forest Service used the best available data and technology, followed standard procedures in the map production, and provided the maps for public review and comment. The agency sought the most appropriate data for the scale, type, and purpose of each specific map product and used that data when and where possible. In all stages of the project, Forest Service field offices provided existing, local forest or grassland data in support of the project.

From the data supplied by the Forest Service field offices, the roadless area conservation team produced different versions of the roadless area maps to meet different purposes. They have different levels of resolution (detail):

- **DEIS and FEIS Volume 2 Maps:** Black and white, page-size State- and forest-level maps. Moderate detail. Show only major roads and larger cities and towns. Forest-level maps also show detailed categories of inventoried roadless areas, special designated areas, and other National Forest System lands.
- **Website Maps (roadless.fs.fed.us):** Color, page-size, national-, State-, and forest-level maps. Moderate-to-general in detail.
 - One version of the national- and State-level maps is limited in detail. They do not show roads. Intended as general location or “index maps.”

– Another version of the State-level maps contains more detail; identified on the website as “high resolution printer friendly.” They show major highways and roads in addition to more detailed forest-level information.

- **Public Meetings Maps:** Color, poster-size State-level maps. Also, depending on the local forest or grassland printing capability, poster size forest-level maps. They contain more detail than either the Volume 2 or the website maps. Designed for use as visual aids, they show many of the roads and smaller towns near the roadless areas.

Between DEIS and FEIS, the Forest Service made a number of corrections and updates to the inventoried roadless area information. These revisions include: 1) display of all special designated areas, 2) separation of all inventoried roadless areas which were previously included within special designated areas, 3) inclusion of updated and approved roadless area inventories associated with forest plan revisions, and 4) cartographic adjustments and corrections to inventoried roadless areas to match national forest and grassland project record information.

2. The Maps in Volume 2 of the Draft EIS are confusing and inaccurate. Specifically, the areas shown for the Inyo National Forest that disallow road construction or reconstruction are incorrect.

Response: Following the release of the DEIS, the Forest Service reviewed the roadless inventory information for all national forests and grasslands, including the Inyo National Forest. Changes in the data submitted for the FEIS have yielded changes in the number of acres defined as inventoried roadless for the Inyo National Forest. See also Response 1.

3. The Forest Service should address the use of GIS overlays on a national scale.

Response: The GIS products used for analyses and in the creation of the national overlays were developed from data collected by local national forests and grasslands. The map data were compiled and GIS overlays were presented at scales appropriate to the environmental analyses. The map data were generalized, when appropriate, to create national scale map products. See also Response 1.

4. The Forest Service should use GIS to help define inventoried roadless areas using depth, width, and

acreage criteria, to ensure that the areas can be managed.

Response: A Geographic Information System (GIS) was used to map and analyze inventoried roadless areas for the DEIS and FEIS. The analysis included inventoried roadless areas and other geospatial data sources listed in the References Cited section of the DEIS and FEIS. The results of the spatial analysis are incorporated in the Forest Health, Ecoregions, Fragmentation, and Size Considerations sections of Volume 1, Chapter 3, Affected Environment and Environmental Consequences.

5. The Forest Service should avoid frequently changing the maps placed into the record for this project.

Response: The maps of record were either published in the printed version of Volume 2 of the DEIS or as a digital version on the Roadless Area web site (roadless.fs.fed.us). The Forest Service released them to the public May 10th, 2000. They were not changed or revised until the FEIS was published. Revisions that were made to the maps in the FEIS were results of the public comment process and the internal review process.

6. The Forest Service should exclude from the roadless inventories areas classified as unsuitable for Wilderness.

Response: Although areas may be classified as unsuitable for Wilderness, they can still be managed for their roadless characteristics. Therefore declaring an area not suitable for Wilderness does not exclude it from the inventoried roadless area list.

Inventory and Definitions

7. The speed with which this initiative is being implemented has not given the Forest Service enough time to accurately inventory roads in areas under consideration.

Response: The mapped inventoried roadless areas displayed in Volume 2 of this FEIS are the basis for the analysis of effects in Chapter 3. These areas were identified using the most recent inventories available from a variety of land and resource management planning and assessment processes, including RARE II. After the inventories were completed, some inventoried roadless areas were managed using land

allocations or planning prescriptions that allowed road construction. While many inventoried roadless areas remain “roadless,” others have been roaded to varying degrees.

In the DEIS, the prohibitions did not apply to “the roaded portions of inventoried roadless areas.” Due to confusion expressed by both the public and Forest Service field units over differentiation between the roaded and unroaded portions of the inventoried roadless areas, the application of the prohibitions has been changed. For the FEIS, the prohibitions will apply to the entire inventoried roadless areas.

Decisions on the management of unroaded areas are discretionary; therefore, these areas will be identified during local planning processes in accordance with the new NFMA Planning Regulations (36 CFR 219). Therefore, there was no need to inventory these areas for this rule. See Responses 20 and 80 in the Roads section.

8. The Clearwater National Forest roadless area maps have incorrect land status designations permitting road construction in proposed Wilderness. They do not reflect the settlement agreement on the Forest Plan.

Response: The settlement agreement pertains to interim management status of the roadless areas until the next plan revision. The settlement agreement did not amend the forest plan or change the land designations. The maps of the Clearwater National Forest roadless areas (DEIS Volume 2) correctly reflected the Forest Plan allocations. The FEIS Volume 2 also shows the current inventory.

9. The Forest Service should explain why the farthest-north portion of the Badger-Two Medicine area of the Rocky Mountain Division of Montana’s Lewis and Clark National Forest is not considered an “inventoried roadless area” on the roadless DEIS map.

Response: The area referred to as the farthest north portion of the Badger-Two Medicine area was not inventoried as roadless in the RARE II process or in any Lewis and Clark National Forest plan inventory process. The prohibitions described in the DEIS and FEIS apply only to areas that have been previously inventoried. The area may be considered unroaded in a future forest plan revision.

10. Camp Hutchins (Shawnee NF) should be included as an inventoried roadless area in the Roadless Area Conservation proposed rule and it should be included in the RARE II inventory via an errata sheet.

Response: The Camp Hutchins area is not an inventoried roadless area. This area was not included in the RARE II inventory of roadless areas. Camp Hutchins was not listed in either the 1986 or 1992 Wilderness and Roadless Area Analysis for the Shawnee National Forest Land Management Plan. See also Response 9.

11. The Forest Service should update their maps of the Ozark National Forest to ensure they do not contain “phantom roads,” specifically Forest Service road 1458A on the Ozark NF Visitors map.

Response: The Forest Service made substantial efforts to prepare and distribute current and accurate data on its roadless area maps. The 1985 Ozark National Forest Visitors map is correct in showing shows a road 1458A along Dismal Creek as an existing Forest road within the inventoried roadless area. As the DEIS stated (p. 3-16), the RARE II mapping criteria allowed the presence of some existing roads in inventoried roadless areas in some circumstances. Also, some roads have been constructed or reconstructed in inventoried roadless areas since the recent inventories. Therefore, some minor or new roads may not appear on the roadless area maps. Further inventory and mapping of individual roads is outside the scope of this proposal. The final Roads Policy is expected to set inventory and mapping requirements. See also Responses 27, 80, and 81 in the Roads section.

12. The Forest Service should reconcile discrepancies in information given regarding the number of acres of inventoried roadless areas. Specifically, in the Intermountain Region including Utah, the roadless area maps on the web site conflict with national forest maps, which show thousands of miles of inventoried forest roads within these areas.

Response: Inventoried roadless areas may contain roads, as shown on National Forest visitors’ maps. The maps on the roadless web site were designed to show the location of the inventoried roadless areas within the specified national forest. The page-size format limits what can be displayed; therefore, only

major roads are shown on the web site maps. Acreage and other statistics for inventoried roadless area acres were developed using site-specific data provided by individual national forests and appear in the FEIS and on our website (roadless.fs.fed.us). See also Response 1.

Printing and Distribution

13. The Forest Service should promptly send documents to those who have requested them.

Response: The Forest Service published notice of the availability of the documents in the Federal Register and Forest newspapers of record. On March 15, 2000, the agency released a public announcement describing how to place an order for a paper or CD version of the DEIS to the news media and posted it on the roadless web site. The DEIS was completed and made available for distribution to the public on May 10, 2000. An electronic version was posted on the roadless web site for downloading and public review on May 10, 2000. The web site also included a list of Forest Service offices and public libraries that received DEIS copies for the public to review. Requests for DEIS copies were processed and sent using US mail. Copies of the DEIS were made available at the public information and comment meetings. Additional copies were available at individual national forest and grassland office locations.

The agency filled thousands of requests for documents. We are aware of only a handful of instances where someone indicated he or she did not receive requested documents. In every instance where we were informed of a specific non-delivery, we took steps to ensure prompt delivery.

14. The Forest Service should provide a separate mailing of maps of all Counties in the State of Idaho to a scale of 1:150,000.

Response: Maps have been produced for the roadless area initiative at the national, State, and forest-level, as appropriate for a project of national scope. It would be beyond the need and scope of the project to produce maps at the County level for all Counties in one State.

Individual national forest and grassland offices usually have roadless area boundaries on maps at

scales such as 1:24,000 or 1:200,000 and can provide additional data to produce maps at the County-level.

15. The Forest Service should divulge its total cost of producing, publishing, and distributing the DEIS.

Response: The entire roadless initiative has cost an estimated \$9.4 million through fiscal year 2000. (This includes indirect costs to the Regional, Forest, and District levels.)

16. The Forest Service should check the graphics in the DEIS. Specifically, some graphics in the DEIS are blackened (top graphic, header and portions of tables of alternatives, etc.).

Response: The comment refers to alternatives tables S-1 through S-4 in the DEIS Summary and 2-2 through 2-5 in the DEIS. In these tables, the Forest Service used shading with the intent to make it easier to view the columns showing the proposed action and preferred alternative. To remedy the uneven shading, we changed the shading on these tables in the FEIS.

17. The Forest Service should clarify the table of contents for Volume II. Does it include only maps?

Response: Yes, Volume 2 of the DEIS and FEIS consist entirely of maps. They are maps of inventoried roadless areas by State, and by individual National Forest. Volume 2 of the FEIS also contains a table of contents and an introduction page.

Other Concerns

18. The Forest Service should explain how and why the estimated roadless acreage has grown from 8% to 25% over the course of planning for the proposed rule.

Response: The DEIS did not imply that only 8% of the National Forest System lands would be affected by the rule. As indicated in the FEIS, inventoried roadless areas account for 31% of all NFS lands.

19. The Final EIS must reflect inventories and evaluations no more than five years old.

Response: The regulations directing planning in the Forest Service, Code of Federal Regulations Title 36 (revised as of July 1, 1999), part 219.17, Evaluation

of roadless areas, state no requirement that an EIS must reflect inventories and evaluations no more than five years old.

20. The Forest Service should evaluate the adequacy of the Wilderness area maps.

Response: We have updated our data for Wilderness since the DEIS was published. All Wildernesses and other designated areas in Forest Service lands are now included in the maps in the FEIS.

21. The Forest Service should address the data presented for the Medicine Bow National Forest in Appendix B.

Response: The inventoried roadless acres listed for the Medicine Bow National Forest in the DEIS were based on RARE II inventory data. The Medicine Bow National Forest was in the process of revising its Forest Plan when the DEIS was prepared. Following the release of the DEIS, the forest updated its roadless area inventory, which received public review, consistent with forest plan revision policy. These new acreages are the most current and now appear in the FEIS.

22. The final EIS should include maps of uninventoried unroaded areas.

Response: The Forest Service cannot generate maps of uninventoried areas because these areas have not been identified. Uninventoried unroaded areas, or the unroaded areas referred to in the DEIS, will be identified in the future at the time of forest or grassland plan revision, using the roads planning framework established in the new Planning Regulations (36 CFR 219).

23. The Forest Service should include Wilderness Study Areas in roadless area inventories.

Response: Wilderness Study Areas (WSAs) within inventoried roadless areas that were not included in the DEIS have been added to the inventory of roadless areas mapped in the FEIS Volume 2.

24. The Forest Service should include land acquired since previous inventories were completed.

Response: The prohibition alternatives would apply to lands acquired since the previous inventories if they are within inventoried roadless areas as defined

in FEIS Volume 2. Newer land acquisitions that remain unroaded would be considered for roadless area conservation during forest and grassland plan revisions, consistent with the new Planning Regulations (36 CFR 219).

25. The Forest Service should use a hierarchical numbering system for the pages of Chapter 3.

Response: Although it was 246 pages long, DEIS Chapter 3 had only five hierarchical levels and did not require the more formal numerical outline system appropriate for more technical EISs. The FEIS retains an informal format similar to the DEIS.

26. The Forest Service should improve the shading of Figure 3-17 on page 3-50 of the Draft EIS.

Response: In the FEIS we have corrected the inconsistent shading in the legend on the DEIS's ecoregions map.

End of Data Section