FINAL DRAFT

NATIONAL FOREST SYSTEM
ROAD MANAGEMENT STRATEGY

ENVIRONMENTAL ASSESSMENT
and Civil Rights Impact Analysis

U.S. Department of Agriculture

Forest Service
Washington Office

February 16, 2000

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U. S. FOREST SERVICE

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Background

On January 28, 1993, the U.S. Forest Service announced its intent to revise its regulations concerning the management of the National Forest Transportation System involving all acres of the National Forest System, whether roaded or unroaded. The public interest and issues surrounding the need for that proposal involved a number of road management concerns, *i.e.*, construction and reconstruction of roads in both roaded and roadless areas, decommissioning of roads, maintenance, costs, access, analysis processes, and relationships to forest planning.

Since the release of this rulemaking procedure, the Forest Service has released other proposed rulemaking and policy revisions. These include: 1) Final Interim Rule for the 18-month Suspension of Road Construction in Roadless Areas; 2) 36 CFR 219 Planning Regulations; and 3) the Roadless Area Protective Rule Initiative. Although these were released separately, all of them are in some way directly or indirectly related to each other and to this proposed road management strategy.

Because of the release of these other proposed and final policy changes, the need and scope of the road management strategy is now more narrowly focused than the Forest Service's original proposal. It provides long-term direction for the management of the road system on the National Forests. However, for roadless and unroaded areas, the strategy is in effect only until the Roadless Area Protection Rule is issued and forest plans are revised.

Purpose and Need

The Forest Service is proposing to revise its policy concerning the management of the National Forest Transportation System to address changes in how the system is developed, used,

maintained, and funded. This action is necessary to ensure that the roads system meets current and future management objectives and public uses of National Forest System (NFS) lands, provides for safe public use, allows for economical and efficient management, and causes minimum adverse environmental impacts.

The existing road system on NFS lands was largely constructed over the last 50 years to develop areas for timber harvesting and to develop other resources such as mineral extraction. In the last two decades, however, interest in alternative uses of the National Forests has increased. Specifically, resource uses on the National Forests have shifted substantially toward recreational activities and watershed, fisheries, and wildlife improvement and away from timber harvesting and similar resource development.

The Forest Service needs to modify its existing road development policy to one that allows the agency to balance scientific information, public needs, safety and environmental protection, and funding levels when determining the size, purpose, and extent of the future Forest Roads System and any specific road reconstruction or construction activities. Further, in response to strong public sentiment, the Forest Service needs to manage its lands to take into account roadless area values such as scenic quality, solitude, and primitive recreation opportunities as well as values associated with resource use such as timber harvesting. On October 19, 1999, the agency announced its intent to prepare an environmental impact statement (EIS) to examine the potential environmental impacts associated with providing protection to the remaining roadless and unroaded areas within the National Forest System (64 Fed. Reg. 56306 (1999)). This action has narrowed the need and scope of this road management proposal and analysis. The agency also needs to develop a complete inventory of its existing road system to identify unneeded roads that could be decommissioned.

After an extensive public involvement process, the Forest Service has developed a proposal to revise its policy concerning the management of the National Forest Road System. Although not required by Forest Service regulations, the Forest Service has decided to prepare this environmental assessment (EA) to examine the potential environmental impacts associated with the revised policy and to further the purposes of the National Environmental Policy Act (NEPA) (42 U.S.C. 4321 *et seq.*). This EA is being issued to inform Forest Service decisionmakers and the public of the impacts.

No Action Alternative and Proposed Action

The Forest Service examined the environmental impacts associated with both the current road policy (no action alternative) and the proposed policy. Actions under the no action alternative are subject to all existing NEPA requirements. Under the no action alternative, the focus is on road development. Road development funds are allocated based on relative needs of the National Forests, existing transportation facilities, the value of timber or other resources served, relative fire danger, and comparative difficulties of construction (see 36 CFR 212.2(c)).

The proposed policy would provide the Forest Road System to best serve the current and anticipated management objectives and public uses of National Forest System lands. In addition, the Forest Service would:

- Develop a comprehensive inventory of classified and unclassified roads that are important to the management and use of the National Forest System;
- Give priority to decommissioning unneeded roads and reconstructing and maintaining the most heavily used roads;
- Add new roads to the transportation system only where supported by a rigorous analysis; and
- Make future decisions regarding proposed road construction, reconstruction, and decommissioning at the local level using a science-based roads analysis that considers environmental and transportation needs and effects at multiple scales.
- Provide analysis guidance for construction of new roads and reconstruction of existing roads within roadless areas until the revisions of forest plans are made or the final roadless protection rule is issued.

Until a comprehensive road inventory had been conducted and roads analyses had been integrated into revisions of forest plans, decisions on reconstruction and construction of new roads in inventoried roadless areas and other unroaded areas would require a demonstration of a compelling need (such as critical resource restoration and protection, public safety, and access provided by statute, treaty, or pursuant to reserved or outstanding rights) and would be made after completion of an environmental impact statement approved at the Regional Forester level.

Environmental Consequences

Under the proposed action, and subject to congressional funding levels, the Forest Service anticipates that (1) more roads would be decommissioned and reconstructed than under the no action alternative, and (2) fewer new roads would be constructed than under the no action alternative. Although this could result in short-term, limited duration impacts, in the long-term, the proposed action would result in greater potential for protection of watersheds and air resources; wildlife; fish; and threatened, endangered, and sensitive (TES) species under the proposed action than under the no action alternative. Over the long-term, implementation of the proposed action could also reduce access to forest resources and the economic and social values associated with those resources.

For purposes of analysis for this EA, the Forest Service assumed that road construction and reconstruction planned for inventoried roadless and other unroaded areas would not occur under

the proposed action, except for roads that would be needed for public safety; to ensure access provided by statute or treaty; to address an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause loss of life or property; or pursuant to reserved or outstanding rights. However, for roaded areas, the Forest Service cannot estimate the miles of roads that would (or would not) be constructed or reconstructed under the proposed action because road construction and reconstruction in roaded areas would be dependent entirely on local conditions and decisionmaking. Although these miles cannot be quantified, it is probable that fewer roads would be constructed in roaded areas than currently planned. The conclusion that fewer roads would be constructed in roaded areas stems from the Forest Service proposed action, which shifts road management emphasis from transportation development to managing environmentally sound access. Part of this proposal utilizes a science-based road analysis that will inform decision-makers on the merits and risks of building new roads. It will extend the traditional transportation planning engineering focus on technical and economic analysis to also include integration of environmental considerations to better provide access within the capability of the land. The proposed action would also direct agency officials to identify the minimum transportation system needed to administer and protect National Forest System lands using the science-based analysis. This approach reflects changes in public opinion, demand, and use of National Forest resources and a science-based analysis with consideration of the environmental impacts of road construction are expected to result in fewer decisions to construct new roads.

Decommissioning. Because only unneeded roads would be decommissioned, roads needed for access to pre-existing rights, public safety, or forest health projects would not be decommissioned under either the no action alternative or the proposed action. Road decommissioning would reduce access for off-road and some high clearance vehicles. Additional road decommissioning under the proposed action would result in further reductions in this type of motorized access in some areas.

Reconstruction. Road reconstruction of needed roads would improve access to all forest resources and reduce environmental damage associated with substandard roads. However, improved access could increase forest use, making management of NFS lands more difficult. As with road decommissioning, additional road reconstruction under the proposed action would result in both additional benefits and adverse consequences as compared to the no action alternative.

Construction. Fewer miles of roads constructed under the proposed action (as compared to the no action alternative) would result in fewer environmental impacts associated with road construction and operation, including hydrology; water quality; site productivity; air quality; habitat loss and fragmentation; migration disruption; sedimentation; and direct mortality of fish, wildlife, and TES species. Fewer roads could also result in reduced access to timber and minerals on NFS lands and reduced opportunities for special land uses and new recreational

facilities. This could result in adverse economic impacts to communities near NFS lands that are dependent on forest resources for their economic viability.

Between the time the proposed policy became effective and the science-based roads analysis is integrated into revised forest plans or the Roadless Area Protection Rule is issued, intrinsic roadless and unroaded area values would be protected by limiting road reconstruction and construction in those areas to cases where a compelling need could be demonstrated. This approach could benefit environmental values such as fish, wildlife and TES species protection and primitive recreation opportunities, and could, depending on local conditions, reduce human-caused fires associated with timber harvesting (*e.g.*, resulting from equipment use) and other forest uses such as camping, hunting, and off-highway vehicle use. This approach could also reduce access to forest resources such as timber, minerals, and motorized recreation, and, in some areas, could reduce access for fire suppression. The effects of the road management strategy on roadless or other unroaded areas would be short term; long-term effects of additional projections in roadless and often unroaded areas will be addressed with EIS for the proposed Roadless Area Protection Rule.

Cumulative Impacts

The most tangible cumulative effect is the potential for an incremental decline in timber harvesting resulting from the proposed road management policy added to declines in timber harvesting from NFS lands over the last 10 years. The proposed action could result in a decline in timber sales of up to approximately $42 million annually, if no timber harvesting dependent on road construction were permitted in inventoried roadless or other unroaded areas. This could affect approximately 2,680 direct jobs. These effects are considered to be the maximum potential effects and any longer-term effects would be disclosed with the Roadless Area Protection Rule EIS.

The potential decline in timber harvesting as a result of the proposed action, together with timber harvesting declines associated with other Forest Service activities, could have a cumulative effect on social and economic resources. However, opportunity does exist to substitute timber, primarily softwoods, from other ownerships to replace some of the reduction in National Forest timber sales in the eastern United States. In the west, substitution opportunity is limited. Substitution factors range from zero (Regions 3, 5, 6, and 10) to 90 percent (Regions 8 and 9). Any volume that could not be substituted from other U.S. ownerships could probably be met by Canadian imports. However, there would be a loss of the payments to states from the substituted volumes.

Relationship between Short-Term Uses and Long-Term Productivity

Long-term productivity of the environment would improve under the proposed action, as compared to the no action alternative, because the proposed action would involve more road decommissioning and reconstruction and less road construction than the no action alternative.

Irreversible and Irretrievable Commitments of Resources

If implemented, the proposed action would tend to reduce irreversible and irretrievable commitments of resources by reducing the miles of roads constructed, particularly, in the short-term, in roadless or other unroaded areas.

Finding of No Significant Impact

[to be developed if appropriate]

Purpose of and Need for Action

Purpose of Action

On January 28, 1998, the Forest Service announced its intent to revise regulations concerning the management of the National Forest Transportation System (*see* Advance Notice of Proposed Rulemaking, 63 Fed. Reg. 4350 (1998)). The purpose of the revision is to better manage existing forest road resources with limited resources and in accordance with improved scientific and technological information and public demands, and provide analysis guidance for road construction and reconstruction in roadless areas until forest plans are revised or the final rule on Roadless Area Protection is issued.

Need for Action

The Forest Service is proposing to revise its policy concerning the management of the National Forest Transportation System to address changes in how the system is developed, used, maintained, and funded. The changes in policy would be reflected in Forest Service regulations (36 CFR Parts 212 and 261) and in the Forest Service Manual, Titles 1900 (Planning) and 7700 (Transportation System) for implementation nationally, effective with the publication of the final rule.

The existing road system on NFS lands was largely constructed over the last 50 years to develop areas for timber harvesting and for other purposes such fire protection. Reflecting this, the current transportation system policy focuses on development of roads into and across NFS lands.

In the last two decades, however, interest in alternative uses of the National Forests has increased. Specifically, resource uses on the National Forests have shifted substantially toward recreational activities and watershed, fisheries, and wildlife improvement and away from timber harvesting and similar resource development. There has been a decrease in timber harvesting and other commodity uses and a steadily increasing growth in the amount and type of recreation uses such as hiking, camping, hunting, fishing, wildlife viewing, and pleasure driving.

For example, roads carry an estimated 15,000 vehicles daily that are associated with timber harvesting and other resource development. Although timber use peaked in 1990, the current level of use is similar to the 1950 level, and it now accounts for only one percent of all forest road use. On the other hand, the agency estimates that, each summer, approximately 1.7 million vehicles are involved in recreational use of roads on NFS lands daily, an increase of over 13 times (1,300 percent) since 1950. The outlook is for recreational road use to grow by an additional 64 percent by 2045. The agency's management policies need to recognize and manage this changed usage.

In addition, current funding levels are not adequate to maintain existing roads to the standards originally planned, minimize ecological impacts, and allow efficient and safe use. Given the

inadequate funding levels, the agency needs to find ways to better manage the road system with limited resources.

Additional scientific information relating to the environmental impacts associated with Forest Service roads has become available. This information has increased the understanding of the environmental, economic, and social impacts of constructing new roads and reconstructing and maintaining existing roads. In particular, the Forest Service has found that today's road construction technology results in fewer and less intensive adverse environmental impacts than did earlier construction methods; however, adverse environmental impacts from roads built before 1980 are more extensive than expected. The agency needs to update information regarding environmental and other impacts to adequately protect the forest environment for future generations.

Many roads on National Forest lands do not meet current standards for safety or environmental protection. Some were pioneered by early settlers; others were planned for temporary access but access was never eliminated. Still others evolved from tracks made by off-road vehicles. Due to their haphazard nature, such roads usually have more adverse impacts on the environment than do permanent, properly planned forest roads which are well engineered and maintained. While the agency estimates that more than 60,000 miles of unauthorized, unplanned, and temporary roads exist on NFS lands, a complete inventory of these roads is needed to identify roads that should be decommissioned.

Building a road in a roadless area has an irreversible impact. Therefore, on October 19, 1999, the Forest Service announced the preparation of an EIS to address to the long-term protection and management of these areas. Although there is strong public concern that no new roads should be built in the remaining roadless areas, approximately 8 million acres of NFS lands in roadless areas are suitable for timber harvesting. The Forest Service needs to manage its lands to take into account roadless area values such as scenic quality, refugia, habitat connectivity, and primitive recreation opportunities as well as values associated with resource use such as timber harvesting.

As described above, the revised road management policy would be one that allows the agency to balance scientific information, public needs, safety and environmental protection, and funding levels when determining the size, purpose, and extent of the future Forest Transportation System and any specific road reconstruction or construction activities. A complete inventory of the Forest Service's existing road system would be conducted and each forest would consider the intrinsic value of roadless and unroaded areas in road construction and reconstruction decisions. Further, the proposed Roadless Area Protection Rule will address long-term management for roadless and unroaded areas. In addition, in accordance with the strong public sentiment expressed in comments to the Forest Service in response to its Advance Notice of Proposed Rulemaking, in open houses at the National Forests, and at focus group meetings convened by

the agency, the Forest Service would continue to rely on local forest planning processes that involve the public and state, local, and tribal governments in planning decisions.

Scoping

The Forest Service announced its intent to revise regulations concerning the management of the National Forest Transportation System in January 1998 (*see* Advance Notice of Proposed Rulemaking, 63 Fed. Reg. 4350 (1998)). Simultaneously, the agency published a proposed interim rule to temporarily suspend temporary and permanent road construction and reconstruction in certain unroaded areas of NFS lands.[1] The purpose of the proposed rule was to take a "timeout" for 18 months while the Forest Service developed a new long-term road management strategy and new analytical tools to provide a more ecological approach to analyzing existing and future road needs. The Forest Service encouraged comments on both the proposed rulemaking and on the proposed interim suspension rule. In addition, on October 19, 1999, the Forest Service announced its intent to prepare an EIS to address the protection of remaining roadless areas.

Over 53,000 letters, postcards, oral comments, and electronic mail messages containing over 164,000 comments were received. In addition, public meetings were held in 31 communities nationwide in February and March 1998. Total attendance was approximately 2,300 people. Sessions were conducted in an open house format to provide maximum opportunity for informal discussion between Forest Service representatives and the public.

The Forest Service analyzed the comments received regarding the proposed rulemaking and the proposed interim suspension rule in separate reports issued in August 1998 (*see* Proposed Rulemaking on Administration of the Forest Service Development Transportation System, Analysis of Public Comments: Final Report (August 20, 1998) and Proposed Interim Rule Suspending Road Construction in Roadless Areas, Analysis of Public Comments: Final Report (August 20, 1998)). In general, the scoping comments received focused on the management and use of roadless areas rather than on the proposed implementation of the road management strategy and roads analysis process. After considering all public comments, the Forest Service issued a final interim rule temporarily suspending road construction and reconstruction in unroaded areas for 18 months or until a new rule is promulgated, whichever comes first (64 Fed. Reg. 7290 (1999)).

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[1] For purposes of the proposed interim rule, "unroaded areas" included (1) remaining unroaded portions of RARE II and land and resource management planning inventoried roadless areas, (2) NFS unroaded areas of more than 1,000 acres contiguous to RARE II areas and forest plan inventoried roadless areas, and (3) unroaded areas of 1,000 acres or more contiguous to wild components of the Wild and Scenic River System or to unroaded areas of other Federal lands larger than 5,000 acres (*see* 64 Fed. Reg. 7290, 7303 (1999)).

Following the issuance of the final interim rule, the Forest Service convened focus groups with external stakeholders and Forest Service employees to examine issues associated with a long-term road management policy. The purpose of the focus groups was to better understand the views of the public, including specific interest groups, regarding roads and transportation on public lands. A summary report of the focus groups was prepared for the Forest Service by an outside consulting firm that had organized and facilitated the focus group meetings (*see* Long Term Roads Policy Focus Groups, USDA Forest Service, Report, dated May 14, 1999).

The comments received in response to the Advance Notice of Proposed Rulemaking and the results of the focus group discussions raised the following issues and concerns, among others:

- Good forest management decisions will result only from a process that includes local agency decisionmakers and the public. Development of a national policy would supercede land management efforts and the National Forest and Regional level, undoing local plans built on extensive and lengthy public involvement and collaborative interagency planning.

- The Forest Service does not have an accurate inventory of existing roads.

- Science and technology should be used to help make or guide specific road policy decisions.

- Decisions to build new roads should be based on need.

- The Forest Service is not adequately maintaining much of its existing road system.

- There was disagreement between groups who oppose aggressive road development and maintenance and those who want the Forest Service to build and maintain roads as needed.

Using the information from the comments received and the focus group discussions, the Forest Service has developed a proposed road management policy and is seeking public comment on this proposal through notices in the Federal Register and by other means. The Forest Service has decided to prepare this EA to examine the potential environmental impacts associated with the revised policy and to further the purposes of NEPA. This EA is being issued along with the proposed rulemaking to inform Forest Service decisionmakers and the public.

This EA quantitatively characterizes the range of miles of roads and areas that could be affected by the proposed policy and the current transportation program (the no action alternative), and qualitatively identifies the kinds of impacts that could occur. Specifically, this EA estimates the miles of roads that would be decommissioned, reconstructed, and constructed on an annual basis on all NFS lands and on inventoried roadless or other unroaded areas under the current program

and compares that to the miles of roads that would be decommissioned, reconstructed, and constructed on those lands under the proposed road management strategy. This estimate is based on past trends and on current forest plans and is intended for comparison purposes only. For purposes of analysis in this EA, impacts of these roads are generally a factor of the miles of roads that would be decommissioned, reconstructed, or constructed and whether the roads would be within inventoried roadless, other unroaded, or roaded areas. The effects to inventoried roadless areas are anticipated to be short-term, and the EIS for the proposed Roadless Area Protection Rule is addressing the long-term effects.