TABLE 7: Anticipated Maximum Economic Impacts of Planned Program of Timber Volume (by region)

	Annual Planned Program of Timber Volume[a] (million board feet)	Projected Receipts per thousand board feet[b] ($)	Direct Jobs Supported per million board feet	Total Projected Receipts ($million)	Total Direct Jobs
Region 1	317	$152	10	$48	3,173
Region 2	166	$143	6	$24	996
Region 3	101	$79	9	$8	912
Region 4	211	$131	9	$28	1,896
Region 5	453	$121	7	$55	3,173
Region 6	976	$198	8	$193	7,808
Region 8	675	$154	10	$104	6,747
Region 9	537	$100	7	$54	3,761
Region 10	189	$23	5	$4	947
TOTAL	**3,625**			**$518**	**29,413**

[a] Planned program of timber volume offered for sale for an 18-month period (annualized) based on 75 percent of the sum of fiscal year 1998 planned program and fiscal year 1999 budget request.

[b] Timber receipt projections based on fiscal year 1997 timber sold values.

Region 1 (Northern) includes National Forests in Idaho, Montana, North Dakota, and South Dakota.
Region 2 (Rocky Mountain) includes National Forests in Colorado, Wyoming, South Dakota, Kansas, and Nebraska.
Region 3 (Southwestern) includes National Forests in Arizona, New Mexico, Texas, and Oklahoma.
Region 4 (Intermountain) includes National Forests in Idaho, Nevada, Utah, and Wyoming.
Region 5 (Pacific Southwest) includes National Forests in California.
Region 6 (Pacific Northwest) includes National Forests in Washington and Oregon.
Region 8 (Southern) includes National Forests in Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, Puerto Rico, South Carolina, Texas, and Virginia.
Region 9 (Eastern) includes National Forests in Minnesota, Wisconsin, Missouri, Illinois, Michigan, Indiana, Ohio, West Virginia, Pennsylvania, New York, Vermont, and New Hampshire.
Region 10 (Alaska) includes National Forests in Alaska.

Region 7 no longer exists, having been incorporated into Regions 8 and 9 in 1965.

Source: *Environmental Assessment for the Interim Rule Suspending Road Construction in Unroaded Areas of National Forest System Land*, March 1999, Appendix D.

Proposed Action

Similar to the no action alternative, impacts of road decommissioning under the proposed action would not be expected to have economic or social impacts. To the extent that road decommissioning provided benefits to scenic views and wildlife, fish, and TES species habitat, decommissioning more miles of roads under the proposed action would increase social values as compared to the no action alternative. In addition, reducing additional miles of unneeded roads could make available additional funds for other forest initiatives, including road reconstruction and new roads where needed. However, to the extent that the reduction in the number of roads on NFS lands reduced off-road vehicle use on those lands, social values of those who enjoy off-road vehicle use could be adversely affected.

More roads would be reconstructed under the proposed action than under the no action alternative. Reconstruction would improve existing roads, increasing public access to and appreciation of forest values. Road reconstruction would also help reduce environmental degradation of existing roads, increasing social value associated with environmental protection and enhancement.

Under the proposed action, new road construction would be reduced as compared to the no action alternative. During the transition, new road construction in inventoried roadless and other unroaded areas would be permitted only upon a showing of compelling circumstances such as critical resource restoration and protection, public safety, and access provided by statute, treaty, or pursuant to reserved or outstanding rights. Approximately 1,581 miles of roads could be expected to be constructed on all NFS lands for all purposes, 246 fewer miles than under the current program (an anticipated maximum decrease of 13 percent) (*see* Table 5).

The limited ability to construct new roads in these areas during the transition would be likely to reduce timber sales and timber harvesting, reduce mineral exploration and development, reduce the number of commercial enterprises allowed to use the National Forests, and reduce the number of Forest Service and commercial recreational facilities on NFS lands. These reductions in forest uses could have adverse economic and social effects and could decrease a community's ability to sustain itself, particularly for small, rural communities near National Forests that are dependent on forest resources for their economic viability. These communities may be disproportionately affected economically, although human health or environmental risks would not increase in these communities.

As discussed above, the Forest Service estimates that approximately 3.6 billion board feet of timber would be offered for sale annually on all NFS lands under the no action alternative. Under the proposed action, the Forest Service estimates that 351 million board feet of timber (approximately 10 percent of the total annual yield) would be not be available for sale as a result

of limitations on new road construction in inventoried roadless or other unroaded areas.[6] Based on data from Table 7 and as shown in Table 8, a volume of 351 million board feet could result in sales of almost $42 million annually and could affect 2,680 direct jobs. In addition, payments to states are estimated to be 25 percent of total receipts. Under the proposed action, such payments could equal $119 million, a decrease of $10 million as compared to the no action alternative. Two initiatives (the proposed Roadless Area Protection Rule and Payment to States Legislation) could effect the economic impacts of the proposals. Payments to States Legislation could offset any decreases in payments, while the Roadless Rule would address the long-term effects of any elimination of road construction or reconstruction in those areas. This road management strategy analysis only discloses the maximum effects anticipated for the transition period. Overall, access to approximately 8 million acres of inventoried roadless areas that have been identified as suitable for timber harvesting could be reduced substantially.

TABLE 8: Comparison of Maximum Timber Volume, Receipts, and Direct Jobs under the No Action Alternative and the Proposed Action

	Timber Volume (annual) (in million board feet)	Timber Sales (annual) (in millions)	Total Direct Jobs
No Action Alternative	3,626[a]	$518	29,413
Proposed Action	3,275[b]	$476	26,733
Difference	(351)	($42)	(2,680)

[a] This number represents timber volume offered for sale. Timber volume sold and later harvested is typically less than timber volume offered for sale.

[b] This number represents timber volume sold.

Source: *Environmental Assessment for the Interim Rule Suspending Road Construction in Unroaded Areas of National Forest System Land*, March 1999, Appendix D.

[6] *See* the Cost-Benefit Analysis contained in Appendix E.

While reduced timber harvesting and minerals exploration and development could have adverse economic and social impacts to some interests, a reduction in forest development could increase social values that promote environmental protection, including water quality and wildlife protection and enhancement.

Limiting road development would also limit the potential for new motorized recreation access, which would have an adverse effect on potential recreational benefits. Other types of recreation such as primitive non-motorized recreation would be positively affected.

Options for implementation of the proposed action include requiring a showing of compelling circumstances only in inventoried roadless areas or in both inventoried roadless and other unroaded areas. Impacts to economic and social values would vary depending on the size of the acreage affected by the road construction limitation.

Civil Rights Impacts Analysis

In accordance with Departmental Regulations on Civil Rights and Equal Opportunity and, in particular, Departmental Regulation 4300-4 (Civil Rights Impact Analysis), the Forest Service examined the potential impact of the proposed policy on civil rights. Further, Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, requires that all Federal agencies identify and address disproportionately high and adverse human health and environmental effects on minority and low-income populations.

The proposed policy provides national guidance for roads analysis and planning. It sets in motion the use of a science-based roads analysis process that will be implemented at the local level. The "Roads Analysis Process" is an integrated ecological, social, and economic approach to transportation planning. It is intended to complement and integrate existing law, policy, and practice into the analysis and management of roads on the National Forests and Grasslands.

The proposed policy would involve the development of an inventory and description of classified and unclassified roads that are important to the management and use of NFS lands; the decommissioning of unneeded roads; reconstruction of critical classified roads; and the use of a science-based roads analysis process in future road construction decisions. Further, in the transition period between the time the policy is initiated and forest plans are revised or the Roadless Area Protection Rule is issued, new road construction or road reconstruction in inventoried roadless and other unroaded areas would require a showing of compelling need and the preparation of an environmental impact statement to disclose the environmental effects. In contrast to the proposed policy itself, which is programmatic, these subsequent road construction decisions will continue to be made at the local level and will reflect incorporation and analysis of civil rights and other and economic social impacts.

As local Forest Service officials implement the roads policy using the "Roads Analysis Process" and subsequent NEPA processes, they will consider the specific social and economic factors, including civil rights impacts, related to revising the management of the local transportation system. These considerations include such matters as the impact of decommissioning roads on protected populations or on access to traditional cultural sites, such as Native American religious sites.

The "Roads Analysis Process" expressly directs that a number of social issues be considered at the local level, including the needs and values people have for road access, access to paleontological, archeological, and historical sites, the effects of the road system on cultural and traditional uses and American Indian Treaty Rights, civil rights, and environmental justice. It specifically asks how "the road system, or its management, affects certain groups of people (minority, ethnic, cultural, racial, disabled, and low-income groups)." See Appendix F.

Similarly, while the agency is currently working on a substantial overhaul and expansion of its civil rights program direction, the existing direction in Forest Service Manual Title 1701 directs Forest Service officials to consider civil rights implications in their decisions on road management. Additionally, the agency's NEPA procedures in Forest Service Handbook (FSH) 1909.15, Chapter 10 expressly require consideration of "consumers, civil rights, minority groups, and women and cross references Forest Service Manual 1730." Also, the agency provides planners with a list of social factors that may need to be considered during any NEPA analysis, including "population characteristics and dynamics, composition, geographic mobility, displacement, civil rights, and historical and cultural resources (Forest Service Handbook 1909.15, Chapter 60.)"

After public and agency comment on the proposed policy, a final action will be adopted by the agency. No civil rights or environmental impacts are anticipated to take place during consideration of the proposed policy. However, it is useful and appropriate to identify any possible adverse impacts on civil rights or possible disproportionately high or adverse effects on human health and the environment of minority and low-income populations and to consider steps that can be taken to avoid or mitigate those effects.

Current Forest Service NEPA procedures would permit the use of a categorical exclusion from environmental documentation for the agency decision to revise its road management policy. Nevertheless, 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. An EA is useful in addressing potential environmental impacts, including impacts on the social environment and, in particular, possible civil rights impacts and environmental justice issues. Because the Council on Environmental Quality regulations implementing NEPA encourage agencies to combine NEPA documents with any other agency document to reduce duplication and paperwork (see 40 CFR 1506.4), the civil rights impact analysis is being combined with the EA.

In considering whether the proposed action would have a civil rights impact, the Forest Service reviewed various Departmental Regulations governing the preparation of Civil Rights Impact Analyses, draft guidance of the U.S. Department of Agriculture Office of Civil Rights (which lists key factors that prompt a Civil Rights Impact Analysis), and Departmental Regulation 5600-2 (Environmental Justice). An analysis of the civil rights implications of the proposed road management policy follows.

Factor 1: Whether the policy, action, program, or activity is newly devised or subject to substantial modifications or revisions.

The proposed policy is a substantial modification of the existing road management policy codified at 36 CFR Part 212 and FSM Chapters 7700 and 7710. As noted previously, the existing road system on NFS lands was largely constructed to provide access for timber harvesting, to allow development of other resources for commodity purposes, such as mineral extraction, and to provide access for and development of forest recreation opportunities. Reflecting this history, the current transportation system policy focuses on road development of new roads.

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 away from timber harvesting and similar resource development. In addition, current funding levels are not adequate to maintain existing roads to the standards originally planned, assure minimum ecological impacts, and ensure efficient and safe use. Thus, the agency needs to find ways to better manage the road system with limited resources, while ensuring continued access to the National Forests and Grasslands for all Americans.

Further, the Forest Service has developed scientific information relating to the environmental impacts associated with Forest Service roads. This information has increased the understanding of the environmental, economic, and social impacts of constructing new roads and reconstructing and maintaining existing roads. The agency needs to take into account this information regarding environmental and other impacts in order to adequately protect the forest environment for future generations.

The proposed policy provides for a science-based roads analysis process in determining future road construction needs on particular forests. This policy is consistent 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 other public group meetings convened by the agency. In accordance with these expressed preferences, the Forest Service would continue to rely on local forest planning processes that involve the public and State, local, and tribal governments, as well as diverse communities, in planning decisions.

Factor 2: The scope (i.e., goals and objectives) of the decision or the intended program outcomes and outputs.

The proposed policy recognizes that the existing road system in the National Forests is essentially complete and proposes that construction of new roads should be limited to those necessary for NFS resource management and use. The Forest Service proposes to use a science-based roads analysis that is driven by the involvement and dialogue of diverse public interests and concerns about NFS natural resources management. The intended program outcomes are first and foremost, a decided shift in policy assumptions on which the road system is managed. Additionally, the proposed policy should result in aggressive decommissioning of roads and in an improved capacity to manage the existing road network. As noted earlier, these potential outcomes and their scope will have to be analyzed at the local level.

Factor 3: Data and information indicating that, historically, one or more identifiable groups have not been included among the beneficiary or participant population.

The proposed policy would enhance the ability of people to work together, build their capacity for stewardship, and achieve ecological, economic, and social sustainability. Based on U.S. Department of Agriculture Civil Rights Action and Implementation Team Reports, there are portions of the U.S. population that are underserved and that require additional outreach activities to improve their potential to participate in forest planning activities. Appendix C contains demographic data.

Protected populations in the United States include women, minorities, and the disabled. Fifty-one percent of the U.S. population are women, 12 percent are black; 1 percent are American Indian, Eskimo, or Aleut; 3 percent are Asian or Pacific Islander; 9 percent are Hispanic (any origin); and 4 percent are of another race other than white. Seven percent of the U.S. population also has some form of disability. Two percent have a mobility limitation only; 3 percent have self-care limitations only; two percent have both a mobility and a self-care limitation. Many people in the United States also do not speak English. Under the "Roads Analysis Process," efforts would be made to broaden the scope and scale of participation of all groups in NFS transportation analysis and planning (see Appendix F).

In particular, the "Roads Analysis Process" would recognize the government-to-government relationship that the Forest Service, as an arm of the U.S. government, has with American Indian tribes and Alaska Natives. It would require the recognition of treaty rights, treaty-protected resources, and other tribal concerns during the planning process. Responsible local officials would reach out to coordinate with American Indian tribes and Alaska Natives to ensure participation in the process and consider tribal data and resource knowledge provided by tribal and village representatives in the roads analysis.

Further, the "Roads Analysis Process" would be conducted within the overall framework of NFS land and resource management planning (36 CFR Part 219; FSM 1920; FSH 1909.12). One goal of NFS planning and management, as reflected in the agency's recently proposed planning rule (64 Fed. Reg. 54075, Part II (1999)), is to enhance the capacity of diverse communities and people to work together with the agency and, in so doing, facilitate their ability to constructively contribute to National Forest management. The "Roads Analysis Process" and the proposed policy would facilitate community building by providing the opportunity and incentives for people to come together to resolve community issues related to Forest Service road management.

The proposed policy would highlight the Forest Service's responsibility to be a good neighbor and to consider the overall context in which the National Forests exist. Nothing in the proposed policy should be interpreted as the desire to infringe upon or limit private property rights. Rather, the responsible official would consider the pattern and distribution of land ownership in the area and the conditions and activities on adjacent lands and in potentially affected communities in evaluating the effects of road decommissioning, reconstruction, and construction decisions. The roads analysis would require the responsible official to actively seek the involvement of individuals who control or have authority over lands near or adjacent to National Forests.

Demographic shifts are recognized by Forest Service employees and partners as they actively work with underserved communities and understand their values and goals. Residents and visitors are treated equitably and are valued. Agency programs, goods, services, and technical and financial assistance are equally available and accessible to all.

Factor 4: Pre-decisional research indicating that one or more identifiable groups will be disproportionately under- or over-represented in the beneficiary or participant population with an interest or stake in the program, policy, or decision.

Pre-decisional research indicates that no identifiable groups will be under- or over-represented as a result of this proposed policy. 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)). Over 53,000 letters, postcards, oral comments, and electronic mail messages were received in response to this notice. 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 also convened groups of external stakeholders and Forest Service employees to examine issues associated with a long-term road management policy. The purpose of the groups was to better understand the views of diverse interest groups regarding roads and transportation on public lands. Every effort was made to

ensure appropriate representation of a broad spectrum of individuals and entities to gain information.

Factor 5: The geographic location in which the decision, action, program, or activity will have the greatest or least impact.

The proposed policy would affect road management for the 190-million-acre National Forest System, including 155 National Forests, 20 Grasslands, and other lands located in 42 states, the Virgin Islands, and Puerto Rico. The greatest proportion of these lands is west of the Mississippi River. Appendix C displays the demographic composition of the United States and groups potentially affected by implementing the proposed road policy.

Factor 6: The composition of the population within the target geographic location.

Planning within the National Forest System, including road management planning, takes place on the National Forests and grasslands in 42 states, the Virgin Islands, and Puerto Rico (see map in Appendix D). The potentially affected populations in any area would be those who live within or near NFS lands, both rural and urban communities; those who depend on NFS lands for their livelihood regardless of location; and those who have other interests in or are otherwise potentially affected by the management and use of NFS lands in both rural and urban communities throughout the nation (see Appendix C).

Factor 7: The economic impact for the population/geographic location and other related economic factors associated with the beneficiary or participant population.

The proposed road management policy is not targeted at a specific, identifiable geographic location and, therefore, should not have an economic impact on a specific population. However, when implemented, the proposed policy will promote an improved understanding of the long-term social and economic sustainability of people who may be associated with NFS lands. Prosperous communities and economies may remain healthy and vibrant if their foundation is ecologically sustainable. Although the Forest Service cannot solely sustain existing communities, NFS lands do contribute many values, services, outputs, and uses that help enable economies and communities to persist, prosper, and evolve. The management of NFS lands, including the road system within those lands, promotes economic and social sustainability through involvement of interested and/or potentially affected people, development and consideration of relevant social and economic information, and providing a range of products, services, and values (36 CFR Part 219 and 64 Fed. Reg. 54075, Part II (1999)).

The Forest Service has prepared a Cost-Benefit Analysis (Appendix E) that addresses social and economic costs and benefits. Social and economic analyses are important in gaining an understanding of the relationships among ecological, social, and economic sustainability. These are conducted during planning to inform decision policy analysis during monitoring and

evaluation of implemented projects. Social analyses address the existence and interactions of human lifestyles; attitudes; beliefs; values, including civil rights impacts and concerns; demographic characteristics; and land use patterns of human communities and their capacity to adapt to changing conditions. Economic analyses identify and evaluate an area's economy, including the rate and contribution of minority populations, low-income populations, and other identifiable segments of the general population. In conducting broad-scale assessments or local analyses, the responsible official should refer to the best available information when considering a variety of social and economic factors and options, including the distribution of benefits among various segments of the interested and affected populations and the extent to which segments of the affected population are under- or over-represented in the economy. An appropriate social analysis may rely on quantitative, qualitative, and participatory methods for gathering and analyzing data. Social analyses are often undertaken at varying spatial scales to improve understanding and the description of the potential consequences to communities and regions from changes in land management. Social analyses may include a regional analysis, a risk and vulnerability analysis, or other appropriate analyses. Local analyses should provide refinement of larger-scale analyses and of regional data and information related to the area under consideration. A local analysis may also provide a context for other analyses and prove useful in evaluating a proposed action or monitoring results.

The proposed policy would establish interaction with, and involvement of, the public, State, local, and tribal governments as a management objective of transportation analysis (see proposed policy, FSM 7710.2, paragraph 4). The proposed policy also specifically assigns to the Forest Supervisor the responsibility to ensure this involvement (proposed FSM 7710.43, paragraph 7). Decisions regarding social and economic sustainability will be made at the appropriate planning level, and decisions made at subsequent levels must be consistent with higher-level decisions. Monitoring and evaluation of social and economic sustainability, as required by the agency's planning regulations at 36 CFR Part 219, would include periodic review of national, regional, and local supply and demand for products, services, and values. In addition, in the course of agency business, program compliance reviews (Title VI and related programs) are conducted. Special consideration must be given to those products, services, and values that the Forest Service is uniquely poised to provide. Monitoring should improve the understanding of the NFS contributions to human wants and values and to social and economic sustainability. The recently proposed forest planning rule also would strengthen monitoring and evaluation.

Factor 8: The extent to which identifiable group members will directly participate in or influence the decisions, policies, programs, and activities or be limited in their opportunity to participate, coupled with information to indicate the quality or characteristics of participation.

It is not possible to quantify the extent to which the adoption of this proposed policy would result in identifiable group members' participation in NFS planning. However, the proposed policy and "Roads Analysis Process" will result in improved knowledge of affected populations and communities. Moreover, given the proposed policy's focus on collaboration with all who are interested in NFS management, the infrastructure of Departmental policies, and the commitment of the Chief of the Forest Service to ensure environmental justice and to reach out to protected populations, including women, minority, disabled, low-income, and other potentially under-represented populations, it is realistic to assume that their participation in future planning efforts should increase. Moreover, the Departmental Environmental Justice Coordinator is now in place and will help provide both a focus and helpful guidance on how to effectively engage protected populations in those planning matters that affect their lives and livelihoods. The agency also has completed a Strategic Outreach Plan to address collaboration with underserved minority and low-income populations.

Factor 9: Efforts to notify and provide outreach to potential beneficiary and participant populations.

As noted, the Forest Service has conducted extensive outreach with respect to the proposed policy on long-term road management. In addition, the Forest Service will continue to conduct such efforts as it seeks to inform and involve a wide variety of people and groups to obtain their comments on the proposed rule.

The Forest Service plans two levels of outreach activities surrounding the roads policy, both of which will reach out to protected populations. On the first level, the Forest Service will provide multiple opportunities to comment on the proposed roads policy. Through extensive use of media, public forums, the Internet, and newsletters, any individual who cares to be involved will have ample opportunities to have his or her viewpoint known. The Forest Service communication plan includes a list of types of groups that will be contacted and involved in the rulemaking process, and specifically identifies tribal governments and traditionally under-represented groups, such as the physically handicapped and urban populations. The Forest Service will be holding a series of public meetings across the country. As a matter of routine agency business, protected populations will be invited to these meetings. Where indicated, the agency, in conformance with Departmental Regulation 4300-4, will make special efforts to reach out to these groups and populations.

On the second level, the Forest Service will reach out to the public, including protected populations, as the policy is actually implemented through local level roads analysis (RAP) and NEPA processes. As a matter of business, individual national forests and grasslands will invite

protected populations to participate in the process and make a good faith effort to ensure that the views and concerns of protected populations are considered in the roads analysis, planning, and decisionmaking processes.

The Forest Service is responding to the changes in the demographic characteristics of the American people when planning and managing its transportation system. The variety of uses, values, products, and services derived from properly managed sustainable ecosystems are equitably and fairly distributed. Inclusion of historically and currently underserved people and communities is an integral part of maintaining the transportation system. Demographic information about the population at large and the population we actually serve is readily available. We have an effective process to adjust our road programs to the changing needs of the public. Through collaborative relationships with community-based organizations and other agencies, we are addressing the priorities of the underserved and utilizing customized delivery systems. Underserved communities benefit when environmental justice is served and investment in all our communities promotes economic and ecosystem health and a well managed transportation system.

Participation and outcomes related to the transportation system reflect a mix of social, cultural, and scientific perspectives. The interdependency of communities and the environment is recognized in transportation management. There is a strong connection between roads and issues and needs of the diverse communities the Forest Service serves. Outreach efforts with underserved communities are proactive and fully supported by Forest Service leadership. Participation by underserved communities is facilitated with appropriate approaches, information, and resources. Roads issues and needs of diverse communities are valued, addressed, and incorporated within the decisionmaking process.

The Forest Service integrates scientific and technical assistance including roads and transportation planning to communities in a manner that is responsive to community needs and priorities, especially those of the underserved. Through coordinated approaches, the priorities of communities will be included in agency efforts to manage the transportation system. Information, including that from Forest Service research and other sources, is essential to serving the public. Social science research is conducted to further understanding of underserved communities, their priorities and their relationships to the Forest Service transportation system.

Having considered the foregoing factors and having analyzed the potential effects of the proposed policy, the agency concludes that there are no adverse impacts on civil rights, or disproportionately high and adverse effects on minority or low income populations.

Costs

Implementation of the no action alternative could be expected to result in the reconstruction of approximately 3,853 miles of roads annually.[7] Based on past experience, the Forest Service estimates that the cost of road reconstruction is between approximately $8,000 (for high-clearance roads) and $50,000 (for arterial or collector roads) per mile. Thus, annual road reconstruction under the no action alternative could result in annual expenditures of approximately $31 to $193 million. Because the proposed action is likely to result in the reconstruction of more miles of roads, costs associated with road reconstruction under the proposed action would be expected to be higher. See Appendix E for a cost-benefit analysis.

Similarly, the no action alternative could result in the construction of an estimated 469 miles of classified roads.[8] Based on past experience, the Forest Service estimates that the cost of road construction is approximately $50,000 (for high-clearance roads) to $210,000 (for arterial or collector roads) per mile. Thus, annual road construction under the no action alternative could result in expenditures of approximately $23 million to $98 million. Because the proposed action is likely to result in the construction of fewer miles of roads, costs associated with road reconstruction under the proposed action would be expected to be lower.

For example, under the proposed action, if all of the classified roads currently planned for inventoried roadless or other unroaded areas were not constructed, a total of only 326 miles of new classified roads would be constructed.[9] Road construction costs under this scenario would be expected to be approximately $16 million to $69 million.

Table 9 summarizes and compares costs associated with the no action alternative and the proposed action.

---

[7] The Forest Service estimates that approximately 4,140 miles of roads would be reconstructed annually under the no action alternative (see Table 3). However, the Forest Service itself would reconstruct approximately 3,853 miles, with the remaining road miles being reconstructed by owners of private land holdings, mineral rights, and ski areas. Only the road reconstruction cost to the Forest Service is calculated here.

[8] As with road reconstruction, the Forest Service would not incur the cost of classified roads constructed for private land holdings, mineral rights, or ski areas. The Forest Service estimates that, of the 626 miles of classified roads that are planned for construction under the no action alternative (*see* Table 3), the agency would construct approximately 469 miles. Of the 168 miles that are planned for construction in inventoried roadless or unroaded areas, 126 would be constructed by the Forest Service.

[9] Of the 484 miles of classified roads that could be constructed under the proposed action (*see* Table 5), the Forest Service estimates that the agency would construct approximately 327 miles.

TABLE 9: Estimated Road Reconstruction and Construction Costs [a]

	No Action Alternative	Proposed Action
Reconstruction	$31 to $193 million	> $31 to $193 million
Construction	$23 to $98 million	$16 to $69million

[a] Costs are for classified roads only.

Summary Table of Potential Impacts

Table 10 provides a summary of the potential impacts associated with the components of the no action alternative and the proposed action.