

CHAPTER 1. PURPOSE OF AND NEED FOR ACTION

The Forest Service has prepared this environmental impact statement (EIS) in compliance with the National Environmental Policy Act (NEPA) and other relevant federal laws and regulations. This EIS discloses the potential environmental consequences that may result from the proposed action and alternatives.

DOCUMENT STRUCTURE

This EIS document is organized into four chapters followed by appendices and related documentation:

- **Chapter 1 - Purpose of and Need for Action:** Chapter 1 presents the background information about the proposed action, the purpose of and need for the proposed action, and a summary of the proposed action. This chapter also summarizes how the Forest Service informed and involved the public, and presents the issues related to the proposed action.
- **Chapter 2 - Alternatives, Including the Proposed Action:** Chapter 2 provides a detailed description of the proposed rulemaking action and alternatives to the proposal, including the no-action alternative. This chapter ends with two summary tables: one displays the features of alternatives considered in detail, and the other shows the environmental consequences associated with each alternative, based on the detailed descriptions in chapter 3.
- **Chapter 3 - Affected Environment and Environmental Consequences:** Chapter 3 describes the resources that may be affected by the proposed action or alternatives, followed by the potential environmental consequences that could result from each alternative. It is organized by biological, physical, and social-economic topics.
- **Chapter 4 - Preparers and EIS Distribution:** Chapter 4 provides a list of preparers and a list of agencies, organizations, and persons to whom copies of the statement are sent.
- **References Cited:** References Cited contains an alphabetized list of references used in the preparation of this EIS.
- **Appendices:** The appendices provide additional detailed information to support the analyses presented in this EIS.
- **Index:** The index provides page numbers for finding key topics in the EIS

Supporting documents for this EIS may be found in the EIS record, located at the Forest Service's Rocky Mountain Regional Office, 740 Simms Street, Lakewood, CO. Some supporting documents are also available on the Web at www.roadless.fs.fed.us/colorado.

BACKGROUND

The Forest Service administers approximately 14,518,000 acres of publicly owned lands in Colorado, which are distributed among eight national forests (USDA Forest Service 2007a). These national forests are characterized by a diverse array of landscapes, ecosystems, natural resources, and land use activities. Management of each national forest is governed by a land and resource management plan (forest plan), along with numerous land management laws, regulations, policies, and agency directives. Laws and regulations take precedence over management direction in the forest plans, where conflicts in management direction exist.

In January 2001, a Roadless Area Conservation Rule (2001 Roadless Rule) was adopted into regulations at 36 CFR 294, following completion of a final EIS (USDA Forest Service 2000a). That 2001 Roadless Rule identified approximately 4,433,000 acres, or about 31 percent, of the National Forest System (NFS) lands in Colorado, as “inventoried roadless areas” (IRAs), based on the existing inventories of roadless areas (figure 3; maps also are available on the Web at www.roadless.fs.fed.us/colorado). The IRAs identified for inclusion in the 2001 Roadless Rule were intended to be generally undeveloped areas, typically 5,000 acres or greater in size, but could be smaller if adjacent to congressionally designated wilderness. The 2001 Roadless Rule applied to national forests nationwide. It provided overarching protections for 58.5 million acres⁶ of IRAs (about 30 percent of NFS lands in the country), by prohibiting road construction and reconstruction and timber harvest in IRAs except under certain exceptional circumstances. The intent of the 2001 Roadless Rule was “to provide lasting protection for IRAs within the context of multiple-use management” (Fed.Reg.Vol.66, No.9, 3243-3273).

⁶ Approximately 3 million acres of roadless areas in Alaska’s Tongass National Forest were exempted from the 2001 Roadless Rule. Therefore, the 2001 Roadless Rule currently applies to 49.2 million acres of NFS land.

Inventoried Roadless Areas in Colorado (Alternative 1 & 3)

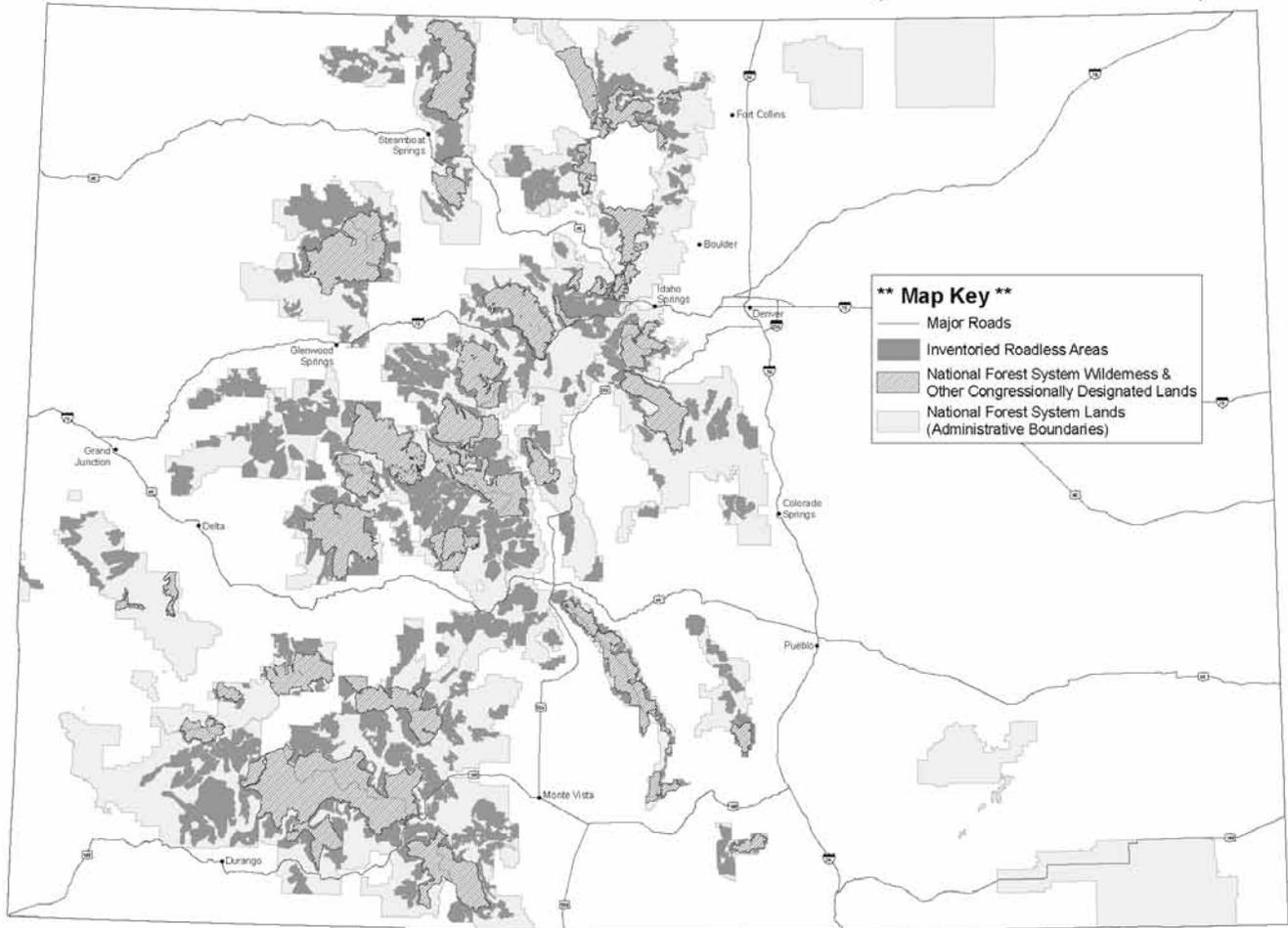


Figure 3. Inventoried roadless areas in Colorado

Roadless area characteristics and values, as defined in the 2001 Roadless Rule preamble (66 FR 3244) and referred to in the proposed Colorado Roadless Rule, are summarized as follows:

- **High quality or undisturbed soil, water, or air.** These three key resources are the foundation upon which other resource values and outputs depend. Healthy watersheds provide clean water for domestic, agricultural, and industrial uses; help maintain abundant and healthy fish and wildlife populations; and are the basis for many forms of outdoor recreation.
- **Sources of public drinking water.** National forests contain watersheds that are important sources of public drinking water. Careful management of these watersheds is crucial in maintaining the flow of clean water to a growing population.
- **Diversity of plant and animal communities.** Roadless areas are more likely than roaded areas to support greater ecosystem health, including a diversity of native and desired non-native plant and animal communities due to the absence of disturbances caused by roads and accompanying activities. Inventoried roadless areas also conserve native biodiversity by serving as a bulwark against the spread of nonnative invasive species.

- Habitat for threatened, endangered, proposed, candidate, and sensitive species, and for those species dependent on large, undisturbed areas of land. Roadless areas function as biological strongholds and refuges for many species, including terrestrial and aquatic plant and animal species. Many of the nation's species currently listed as threatened, endangered, or proposed for listing under the Endangered Species Act, and those listed by the Forest Service as sensitive, have habitat within IRAs.
- **Primitive, semi-primitive motorized, and semi-primitive non-motorized.** These recreation classes of dispersed recreation opportunities often provide outstanding opportunities for hiking, camping, wildlife viewing, hunting, fishing, and cross-country skiing. Although areas with these recreation opportunities may have many wilderness-like attributes, they often allow the use of mountain bikes and other mechanized means of travel, in contrast to designated wilderness areas. Primitive, semi-primitive motorized, and semi-primitive non-motorized areas can also take pressure off heavily used wilderness areas by providing additional solitude and quiet, and dispersed recreation opportunities.
- **Reference landscapes.** The body of knowledge about the effects of management activities over long periods of time and on large landscapes is very limited. Reference landscapes can provide comparison areas for evaluation and monitoring. These areas provide a natural setting that may be useful as a comparison to study the effects of more intensely managed areas.
- **Natural-appearing landscapes with high scenic quality.** High quality scenery, especially scenery with natural-appearing landscapes, is a primary reason that people choose to recreate. Quality scenery contributes directly to real estate values in neighboring communities and residential areas.
- **Traditional cultural properties and sacred sites.** Roadless areas may contain traditional cultural properties and sacred sites. Traditional cultural properties are places, sites, structures, districts, or objects that are historically significant in the beliefs, customs, and practices of a community. Sacred sites are places that are determined sacred by virtue of their established religious significance to or ceremonial use by an Indian religion. Federal agencies are to accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners, and are to avoid adversely affecting traditional cultural properties and sacred sites when practicable.
- **Other locally identified unique characteristics.** Roadless areas may offer unique characteristics and values that are not covered by the other categories. Examples include uncommon geological formations, which are valued for their scientific and scenic qualities, or unique wetland complexes. Unique social, cultural, or historical characteristics may also be dependent on the roadless character of the landscape. Examples include ceremonial sites, places for local events, areas prized for collection of non-timber forest products, or exceptional hunting and fishing opportunities.

Since its promulgation, the 2001 Roadless Rule has continued to be the subject of litigation. Ongoing uncertainty about the future of the 2001 Roadless Rule was a key factor that influenced the Governor of Colorado to initiate state-specific protections that would conserve the values and characteristics of Colorado roadless areas. To this end, in May 2005, Colorado enacted Senate Bill 05-243 (C.R.S. § 36-7-302), which directed formation of a 13-person bipartisan

taskforce to make recommendations to the governor regarding the appropriate management of roadless areas on the national forests in Colorado.

The state's roadless taskforce conducted a comprehensive public participation process, which included holding nine public meetings – one in the capitol of Denver and others in eight localities across Colorado. The taskforce received and evaluated more than 40,000 public comments for

In November 2006, Colorado Governor Bill Owens used the taskforce's recommendations as the basis for petitioning to the Secretary of Agriculture to undertake state-specific roadless rulemaking for Colorado. The state's petition was considered for rulemaking by the Secretary of Agriculture in accordance with the Administrative Procedures Act, section 553(e) of the U.S. Code of Federal Regulations (CFR) and the Department of Agriculture's rulemaking procedures at 7 CFR §1.28. After Governor Owens submitted the State's petition to the Department of Agriculture, Bill Ritter, Jr. was elected Governor of Colorado. In April 2007, Governor Ritter resubmitted the petition with minor modifications. In June 2007, the state and the U.S. Forest Service presented the modified petition to the Department's Roadless Area Conservation National Advisory Committee. In August 2007, based on the advisory committee's review and report (USDA RACNAC 2007a), the Secretary of Agriculture accepted the state's petition and directed the Forest Service to work in cooperation with the State of Colorado to initiate rulemaking (USDA RACNAC 2007b).

The state's petition requested the rulemaking process use the most updated roadless boundaries. Updating roadless area evaluation for Colorado resulted in identifying approximately 4.031 million acres or about 29 percent of NFS lands in Colorado, as appropriate for management as Colorado's roadless areas (figure 4). Based on the petition, the state and the Forest Service collaboratively developed the rulemaking (regulatory) language for a proposed Colorado Roadless Rule that would govern management of roadless areas on NFS lands in Colorado.

Inventoried Roadless Areas in Colorado (Alternative 1 & 3)

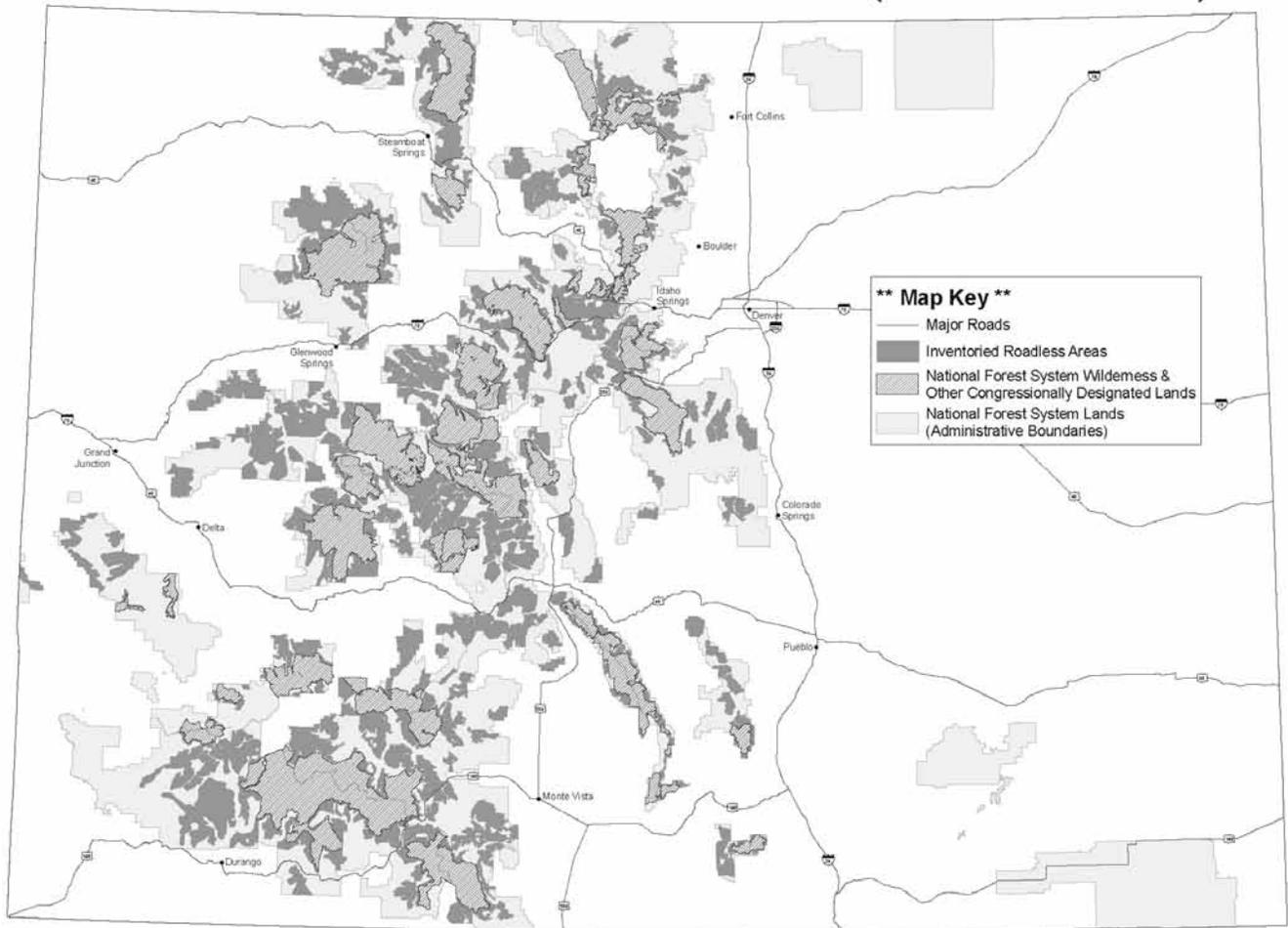


Figure 4. Proposed Colorado roadless areas developing a state-specific roadless rule

PURPOSE OF AND NEED FOR ACTION

The Department of Agriculture, the Forest Service, and the State of Colorado are committed to conserving and managing roadless areas on NFS lands in Colorado. The Department, Forest Service and state are seeking to establish lasting direction for the management of roadless areas in Colorado in light of the uncertain future of the 2001 Roadless Rule that has been the subject of ongoing litigation.

The proposed state-specific rule is intended to provide greater management flexibility under certain circumstances to address unique and local land management challenges, while continuing to conserve roadless values and characteristics. Increased management flexibility is primarily needed to reduce hazardous fuels and large-scale insect and disease outbreaks, allow access to coal reserves in the North Fork coal mining areas, and to allow access to future utility and water conveyances, while continuing to conserve roadless area values and characteristics.

The state-specific rule presents an opportunity to effectively integrate local and national perspectives on roadless area management. It offers a greater opportunity for collaboration among government officials and the citizens of Colorado in creating a solution for conserving

the integrity and beauty of Colorado's roadless areas along with increasing flexibility to address other important land and resource management concerns.

Further, the state requested and the Forest Service agreed that the roadless area boundaries be reviewed and where necessary adjusted to more accurately reflect roadless characteristics and to correct outdated boundaries and mapping errors.

In summary, the Department of Agriculture, the Forest Service, and the State of Colorado agree there is a need to balance local and national interests in providing management direction for roadless areas on NFS lands in Colorado. There is a need to refine and adjust some of the provisions of the 2001 Roadless Rule in order to improve the balance between conserving roadless characteristics while addressing forest health and community wildfire protection needs and access to valuable energy resources.

At the same time, there was a desire for the Colorado Roadless Rule to retain many of the key provisions from the existing 2001 Roadless Rule, in order to:

- Protect roadless characteristics and values
- Maintain existing rights and permitted uses, including those provided by statute, treaty, and other legal instruments, for occupancy and use of NFS lands
- Provide reasonable access to publicly and privately owned property and facilities
- Maintain the ability to respond to emergency situations and major threats to human life and property
- Protect human health and safety
- Prevent irreparable resource damage
- Protect wildlife habitat, especially for threatened, endangered, or sensitive species

PROPOSED ACTION

The Department of Agriculture in cooperation with the State of Colorado propose to promulgate a state-specific rule to manage roadless values and characteristics on NFS lands in Colorado. This rule would be known as the Colorado Roadless Rule.

The proposed rule would establish a system of Colorado roadless areas (CRAs) with protections for management of these areas, which would supersede the 2001 Roadless Rule for NFS lands in Colorado.

The proposed Colorado Roadless Rule would adjust roadless area boundaries by: (a) adjusting some roadless area boundaries to correct mapping errors that primarily resulted from improvements in inventory data and mapping technology; (b) not including acres substantially altered by roads and timber harvest activities; (c) not including ski areas under permit or allocated to ski area development in the governing forest plans; (d) not including congressionally designated lands such as wilderness and other designations that take legal precedence over roadless area regulations; and (e) including unroaded areas outside IRAs that meet roadless area characteristics.

The proposed CRAs would encompass approximately 4.031 million acres of NFS land in Colorado, distributed among 345 separate roadless areas (appendix A). The proposed rule provides for corrections and revisions to be made to CRA boundaries. The Chief of the Forest Service would maintain the official map of CRAs, which would be made readily available to the public.

In addition to revising roadless area boundaries, the Colorado Roadless Rule proposes a management strategy for activities and land uses within CRAs. The rule would maintain many of the 2001 Roadless Rule prohibitions on road construction and reconstruction and tree-cutting activities in roadless areas; however, there would be some important differences. The proposed rule differs from the 2001 Rule primarily by defining additional circumstances in which those activities are allowed to occur in CRAs. Chapter 2 describes the proposed rule in greater detail, along with other alternatives considered in this analysis.

SCOPE AND APPLICABILITY

Scope of the EIS

The scope of this EIS consists of the range of actions, alternatives, and impacts that are considered relevant to the proposed action. The proposed action is geographically limited to roadless areas on NFS lands within the State of Colorado. The scope of the proposed action is primarily limited to road construction/reconstruction and tree-cutting activities within roadless areas. The proposed rule will not affect land use permits, contracts, or other legal instruments issued prior to the effective date of a rule.

The scope of the proposed rule is programmatic in nature and intended to guide future development of proposed actions within roadless areas. This proposal does not authorize the implementation of any ground-disturbing activities, but rather it describes circumstances under which certain activities may be allowed or restricted within roadless areas. Before authorizing land use activities in roadless areas, the Forest Service must complete a more detailed and site-specific environmental analysis pursuant to the NEPA and its implementing regulations at 40 CFR 1500-1508. When a specific project or activity is proposed on NFS land, site-specific effects are analyzed and decisions are made regarding how, where, and when the specific activities may occur.

Where conflicting management direction exists between forest plans and a Colorado Roadless Rule provision, the more restrictive direction would prevail. For example, forest plan direction that prohibits road construction in roadless areas would continue to apply under all alternatives. Forest plan direction that does not constrain roading in roadless areas may be preempted by the roading prohibitions in the Colorado Roadless Rule. Future forest plan amendments may further constrain project activities in a roadless area.

Applicability

The lands subject to this rulemaking are NFS lands in Colorado that contain roadless areas under any of the alternatives. There are eight national forest administrative units in Colorado that are subject to this roadless rulemaking EIS. These eight national forest units are referred to in this EIS as national forests, even though some consist of a combination of national forests that

are managed under a single forest plan. None of the national grasslands in Colorado contain roadless areas; therefore, those lands are not included in this analysis. Seven of the eight national forest units are within the Forest Service’s Rocky Mountain Region (Region 2). The Manti-La Sal National Forest is within the Forest Service’s Intermountain Region (Region 4). Only 2 percent (27,000 acres) of the 1.4 million-acre Manti-La Sal National Forest occurs in Colorado; most of the Manti-La Sal National Forest is in Utah.

Table 3 lists the eight national forests in Colorado that are applicable to this EIS. It provides information about each national forest administrative unit and the date of its last approved forest plan.

Table 3. National forest administrative units in Colorado and associated forest plan approval date

National forests in Colorado	Date of approved forest plan
Arapaho and Roosevelt National Forests	1997
Grand Mesa, Uncompahgre, and Gunnison National Forests	1983 (Revision in progress)
Manti-La Sal National Forest	1986 (Revision in progress)
Routt National Forest	1998
Pike and San Isabel National Forests	1984 (Revision in progress)
Rio Grande National Forest	1996
San Juan National Forest	1983 (Draft revised plan 2007; Revised plan expected 2009)
White River National Forest	2002

DECISION FRAMEWORK

The Secretary of Agriculture, or a delegated designee, will decide whether to promulgate the Colorado Roadless Rule as proposed, or one of the other alternatives analyzed in this EIS. Promulgation of a rule involves establishing regulations, which would be issued under Title 36 of the Code of Federal Regulations (CFR) Part 294. The decision involves a choice among three alternatives analyzed in detail in this EIS, which means determining whether to:

- Continue to manage inventoried roadless areas (IRAs) in Colorado pursuant to the 2001 Roadless Rule (Alternative 1 - No Action)
- Promulgate a state-specific rule to manage Colorado’s roadless areas (CRAs) based on the proposed Colorado Roadless Rule (Alternative 2 - Proposed Action)
- Promulgate a state-specific rule to manage inventoried roadless areas (IRAs) in Colorado based on direction in the forest plans for the eight national forests in the State of Colorado (Alternative 3 - Forest Plans)

Alternative 1 addresses both forms of the no-action alternative. In one form, the Secretary could decline to promulgate a rule establishing new management direction for these lands and allow the current management status to continue. This option would neither adopt, nor reject, the 2001 Roadless Rule; however, the 2001 Rule would remain operative for these lands, subject to the various ongoing lawsuits. A second type of no-action alternative under consideration is that

the Secretary could decide to promulgate a state-specific rule for Colorado that continues and affirmatively adopts the provisions of the 2001 Rule currently in place. The analysis in this EIS addresses both possible outcomes for alternative 1.

PUBLIC INVOLVEMENT

Management of roadless areas has been an ongoing discussion with the public for several decades. The Forest Service and State of Colorado collected and considered public comments regarding management of roadless areas on NFS lands through several formal public participation processes conducted over the past decade, including public participation for development of: (a) the 2001 Roadless Rule and associated EIS; (b) the Colorado petition for roadless area conservation; (c) revised forest plans for several national forests in Colorado; and (d) this EIS for the proposed Colorado Roadless Rule.

The evaluation of public comments during these public involvement processes generally found two dominant and divergent points of view regarding roadless area management and decision making. One view places greater emphasis on environmental preservation and land use prohibitions, with more support for a national-level decisionmaking process for all roadless areas in the nation. The other view emphasizes allowing responsible land and resource management activities and uses, with support for more locally influenced decisionmaking processes.

2001 Roadless Area Rule

This analysis for the proposed Colorado Roadless Rule considered comments generated during public participation for the 2001 Roadless Rule. During the formal scoping period used when that Rule was proposed (October 19 to December 20, 1999), the Forest Service received more than 360,000 individual responses, representing more than 500,000 comments. During the comment period for the draft EIS for that proposed Rule (May 9 to July 17, 2000), the agency subsequently received more than 1.2 million comments. The Forest Service responded to these public comments in the final EIS, Volume 3 - Agency Responses to Public Comments (USDA Forest Service 2000a), and in the preamble to the 2001 Roadless Rule as published in the Federal Register on January 12, 2001 (Vol.66, No.9, 3243-3273).

Colorado Roadless Petition

This analysis for the proposed Colorado Roadless Rule considered public comments generated during public participation for the State of Colorado Roadless Petition. The state's petition was used to develop the proposed Colorado Roadless Rule. The state formed a bipartisan taskforce to develop its petition for management of roadless areas in Colorado. The state's taskforce conducted a structured public involvement processes to develop the petition, in accordance with requirements in Colorado Senate Bill 05-243 (2005). The taskforce held nine public meetings from November 2005 to June 2006 and received more than 40,000 written comments (on the Web at www.roadless.fs.fed.us/colorado).

Forest Plan Revisions

All national forests in Colorado have either completed or are in the process of completing revisions of their forest plans. Public participation is an integral element of the revision process, including evaluation of IRAs and their associated management strategies. Development of this EIS considered those public comments.

Roadless Area National Advisory Committee

This advisory committee was chartered by the Secretary of Agriculture to provide a national perspective on state petitions regarding roadless area management. In June 2007, the advisory committee heard comments on the proposed Colorado Roadless Petition from state and Forest Service officials as well as members of the public representing several different organizations (USDA RACNAC 2007c). This analysis considered these comments in development of this EIS.

Proposed Colorado Roadless Rule

In December 2007, the Forest Service published a notice of intent in the Federal Register to prepare an EIS on roadless area conservation on NFS lands in Colorado (Fed. Reg. Vol. 72 No. 246, 72982). Interested parties on a mailing list were also notified of this opportunity to comment on the proposal, and the Federal Register notice was posted on the Web. The comment period ended on February 25, 2008. More than 88,000 comments were received, about 95 percent of which were duplicate comments. These comments were evaluated and summarized in a scoping report that is available in the EIS record. The draft EIS will be subject to public review and comment, and responses to comments will be addressed in an appendix to the final EIS.

In general, many of the comments received during the state's public participation processes for developing the state's petition, and the subsequent scoping of the proposed Colorado Roadless Rule, were similar to those received through earlier public involvement processes including those for the 2001 Roadless Rule and forest plan revisions.

Opponents of the proposed Colorado Roadless Rule generally express a preference for the provisions of the 2001 Roadless Rule, indicating they believe it provides greater protection for roadless areas and sets a national standard for the management of roadless areas within national forests. Many of these comments indicate a preference for maintaining existing prohibitions on roads and tree-cutting activities in order to better safeguard opportunities to experience solitude and quiet in a natural environment; or to better ensure protection of native wildlife and plant diversity, special-status species, water, soil, and air quality. These comments include the perspective that roadless areas as currently protected provide a "refuge" that buffers fragile ecosystems and habitats from developed areas, slows the spread of invasive species, and offers an opportunity for preserving more of America's wild and cultural heritage for future generations. These viewpoints are addressed by alternative 1, which maintains the provision of the 2001 Rule.

Another group of opponents of the proposed Colorado Roadless Rule express a preference for managing roadless areas strictly in accordance with the forest plans that are developed for each national forest in collaboration with the public. This group does not see a compelling need for regulations that prohibit or restrict activities within roadless areas beyond those outlined in

existing forest plans. These comments were used to develop alternative 3, which offers an option to manage roadless areas in Colorado based strictly on forest plan direction.

Comments in support of the proposed Colorado Roadless Rule often emphasize desires to ensure forest and ecosystem health in a manner that can also provide recreational, aesthetic, social, and economic benefits for the residents of Colorado and citizens nationwide. Some comments support allowing flexibility to responsibly conduct multiple-use management activities while conserving roadless area values and characteristics.

Similar to comments raised in previous roadless rulemaking and petitioning processes, some people express a preference for the proposed state-specific rule because they believe it better accounts for the unique land and resource situations in Colorado and the values held by Colorado residents. Other people express a preference for all citizens across the nation to have an equal voice in how national forest lands are managed, and for all roadless areas to receive the same protections nationwide.

TRIBAL CONSULTATION

The federal government has a unique government-to-government relationship and trust responsibility with federally recognized tribes based on a variety of laws, executive orders and court decisions designed to protect a tribe's interests. There are two resident tribes in Colorado – Ute Mountain and Southern Ute, who retain some of their traditional land base as reservations through a series of treaties, agreements and laws. These two tribes retain specific hunting rights and other aboriginal rights throughout their traditional territory, which includes portions of the roadless areas in Colorado. Over a dozen other tribes located outside Colorado maintain tribal interests, including aboriginal and ceded territories, and inherent aboriginal rights within Colorado.

The Forest Service consulted with all of those potentially affected tribes about the proposed Colorado Roadless Rule, through letters as well as follow-up phone calls, e-mails or meetings, from October 2007 through January 2008 (details in EIS record). No reply letters were received from any tribes during the scoping period for this EIS. However, tribal concerns surfaced during phone or e-mail consultations. Those concerns related to: maintaining existing tribal hunting and access rights within roadless areas, limiting public use of temporary roads, and decommissioning temporary roads after they are no longer needed. Those land uses and management activities would not be affected by the proposed Colorado Roadless Rule; therefore, those concerns are briefly discussed but not analyzed in detail in this EIS. Consultation with interested or affected tribes will continue throughout the analysis and decisionmaking process.

ISSUES

The National Environmental Policy Act (NEPA) implementing regulations at 40 CFR 1501.2 require agencies to develop and evaluate alternatives to recommended courses of action in any proposal that involves unresolved conflict concerning alternative uses of available resources. Scoping was used to identify points of disagreement or dispute about the proposed Colorado

Roadless Rule (proposed action) and to identify issues to use as a basis for developing and evaluating alternatives.

Comments that support the purpose of and need for the proposed action are not listed here as “issues” but are evaluated in this EIS as to how well each alternative addresses the purpose and need (refer to Purpose and Need section for details). For example, the alternatives are evaluated for the degree to which they meet the stated purpose and the need to improve management flexibility, to address:

- Large-scale insect or disease outbreaks or similar forest health situations
- Fuel accumulations and wildfire hazards
- Access to coal reserves in the North Fork coal mining areas
- Future needs for utility and water conveyance structures that may require locations within roadless areas.

The alternatives also evaluate how well the proposed action and other alternatives meet the purpose and need to:

- Improve and update roadless area boundaries
- Continue to conserve roadless area characteristics and values.

NEPA regulations require the agency to identify and eliminate from detailed study those issues that are not significant or that have been covered by prior environmental review, to narrow the scope of the analysis. Reasons for eliminating issues from detailed study include:

- General opinions or position statements not specific to the proposed action
- Addressed by other laws, regulations, or policies
- Not relevant to the potential effects of the proposed action, or otherwise outside the scope of this analysis.

The following issues were eliminated from detailed study in this EIS because they are outside the scope of the effects of the proposed Colorado Roadless Rule:

- National Park Service management issues
- General conditions of public lands
- Conditions of roads and facilities on national forests
- Political motivations or integrity of government officials
- Public participation processes or procedures
- Funding priorities and government expenditures
- Alternative energy on national forests
- Wilderness protection or recommendations for wilderness designation

- Motorized vehicle use and routes or other travel management topics⁷
- Livestock grazing permits and allotment management
- How the proposed Colorado Rule may set a precedence for management of roadless areas in other states or have undesired effects on neighboring states

All public comment letters, along with a summary evaluation of the public comments received during scoping of this proposed action are available on the Web at www.roadless.fs.fed.us/colorado.

Issues Addressed in this EIS

The following issues were carried through the analysis process to evaluate differences in the consequences among the alternatives.

Issue – Potential loss of roadless area characteristics and values. The reduction in roadless area acreage under the proposed Colorado Roadless Rule may result in a potential loss of roadless area characteristics and values on those acres excluded from the roadless areas.

Issue – Potential reduction in ecological integrity and biological resource values. The proposed expansion of circumstances in which roading, tree-cutting, and some other activities may occur in roadless areas under the proposed Colorado Roadless Rule may result in a potential reduction in ecological integrity and biological resource values, including the ability to maintain diverse populations of wildlife, fish, and plants, including the potential for:

- An increase in the prevalence of invasive plants, animals, and other organisms that can out-compete and dominate diverse native plant and animal communities
- A loss or reduction of wildlife or fish habitat or population viability, including reductions in unfragmented interior habitat, migration corridor connections, and security and quality of habitat for some “at risk” species or important game species
- A loss or reduction of threatened, endangered, or sensitive plant species populations or habitat.

Issue – Potential reduction in soil and water quality. The proposed expansion of circumstances in which roading, tree-cutting, and some other activities may occur in roadless areas under the proposed Colorado Roadless Rule may result in a potential reduction of watershed health, including declines in soil and water quality, including the potential for:

- Accelerated soil erosion or other soil impacts that can affect long-term productivity
- Increases in stream sedimentation that can affect water quality and water uses off-site and downstream from the roadless areas.

Issue – Potential reduction in semi-primitive recreation and related values. The proposed expansion of circumstances in which roading, tree-cutting, and some other activities may occur in roadless areas under the proposed Colorado Roadless Rule may result in a potential reduction in semi-primitive recreation opportunities away from the sights and sounds of human activities and built environments, including the potential for:

⁷ The Forest Service is currently conducting environmental analysis to make decision regarding management of motorized travel on NFS lands, including lands within the roadless areas in Colorado.

- A reduction in opportunities for spiritual renewal and solitude
- A reduction in scenic quality
- Reductions in scientific, heritage, and legacy benefits that might be derived from preserving the undeveloped nature of roadless areas for future generations.

Issue - Potential loss of opportunities to explore for and develop oil and gas resources.

Prohibiting road construction to access oil and gas basins in roadless areas that have not been leased prior to promulgation of the proposed Rule, may result in a potential loss of opportunities to explore for and develop oil and gas resources in those areas.

Issue - Potential loss of opportunities to explore for and develop coal resources outside the North Fork coal area. Prohibiting construction of roads to access coal reserves in areas that have not been leased (prior to promulgation of the proposed Rule) and are located outside the North Fork coal mining area may result in a potential loss of opportunities to explore for and develop coal resources in those areas.

Issue - Potential loss of opportunity to feasibly transport oil and gas resources using pipelines. Prohibiting oil-gas pipelines from going through roadless areas from lands outside roadless areas may result in a potential loss of opportunity to feasibly extract and transport oil and gas resources.

Issue - Potential impacts on roadless characteristics from future utilities and water conveyances. Allowing construction of new roads and associated utility and water conveyance facilities in roadless areas under the proposed Colorado Roadless Rule may result in potential impacts on natural resources and the undeveloped character of the roadless areas.

