

USDA United States
Department
of Agriculture

Forest Service

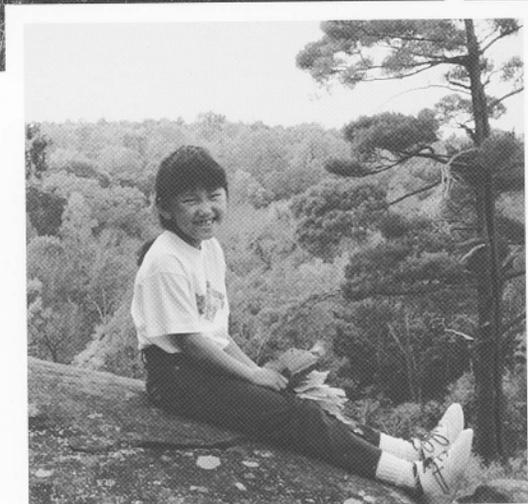
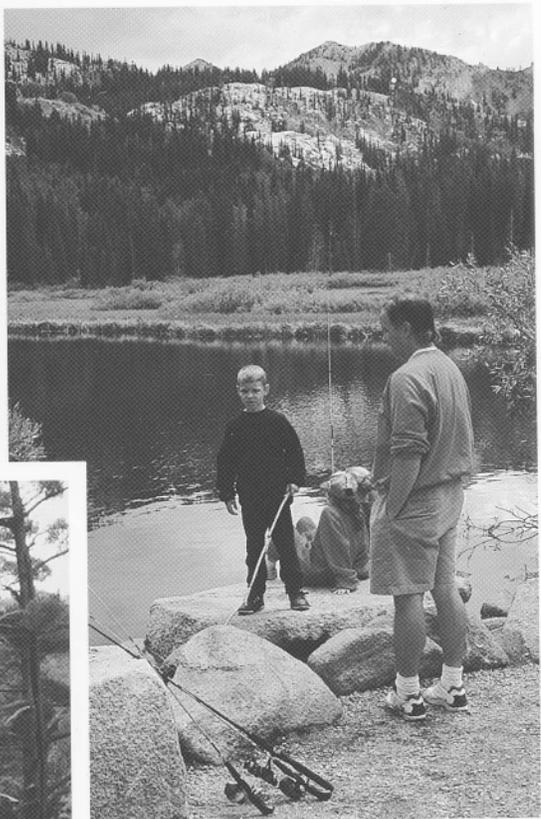
Washington Office

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Forest Service Roadless Area Conservation

Final Environmental Impact Statement Volume 3 – Agency Responses to Public Comments



Acronyms and Abbreviations

ANILCA	Alaska National Interest Lands Conservation Act
ASQ	Allowable Sale Quantity
BBF	Billion board feet
BLM	Bureau of Land Management
BMP	Best Management Practices
CAET	Content Analysis Enterprise Team
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
DEIS	Draft Environmental Impact Statement
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FEIS	Final Environmental Impact Statement
FEMAT	Forest Ecosystem Management Assessment Team
GIS	Geographic Information System
ICBEMP	Interior Columbia Basin Ecosystem Management Project
LUD	Land Use Designation (Tongass National Forest)
MMBF	Million board feet
NEPA	National Environmental Policy Act
NFMA	National Forest Management Act
NFS	National Forest System (includes national forests and grasslands)
NOI	Notice of Intent
NMFS	National Marine Fisheries Service
OHV	Off-highway Vehicle
RARE	Roadless Area Review and Evaluation
RARE II	Second Roadless Area Review and Evaluation
ROD	Record of Decision
ROS	Recreation Opportunity Spectrum
SAA	Southern Appalachian Assessment
TEP	Threatened, Endangered, and Proposed
TEPS	Threatened, Endangered, Proposed, and Sensitive
TLMP	Tongass Land Management Plan
USC	United States Code
USDA	United States Department of Agriculture
USDI	United States Department of the Interior
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey

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Introduction

The Forest Service has documented, analyzed, and responded to the public comments received on the Draft Environmental Impact Statement (DEIS). Volume 3 describes the substantive comments received on the DEIS and provides the agency's response to those comments. This response complies with section 40 CFR 1503.4, Response to Comments, of the National Environmental Policy Act (NEPA) regulations.

Background

During the public comment period on the DEIS running from May 9 to July 17, 2000, the public submitted approximately 1,155,000 separate pieces of input, called "responses." Responses were received in a variety of forms including letters, faxes, e-mail, web site responses, public hearing transcripts, Forest Service memos, and unconventional formats including photographs, videotapes, and t-shirts. The responses went to the agency's Content Analysis Enterprise Team (CAET) based in Salt Lake City, Utah.

Content Analysis

Content analysis is a systematic method of compiling, categorizing, and capturing the full range of public viewpoints and concerns about the DEIS. Content analysis helps the interdisciplinary team organize, clarify, analyze, and be responsive to information the public provides to the agency.

The content analysis process is not a vote-counting process. The process is designed to read each response, capture the meaning of each individual comment within that response, and provide that meaning to the interdisciplinary team and decision-maker in a clear, understandable form.

Upon receipt of each response, CAET assigned it a unique identifier, and identified the type of respondent (individual, agency, elected official, etc.) and geographic origin. This information was compiled in a database that allowed the agency to query the comments in a number of ways.

Comment coders then read each response, highlighted substantive comments within each, and labeled each by subject area. From the 1,155,000 responses, CAET identified approximately 2,450 separate public comments in those responses.

Data entry personnel copied the highlighted comments verbatim into the database. Analysts organized them by topic, and divided them into separate, distinct public concern statements. They selected a representative variety of verbatim quotations from the database and displayed these after the concern statement. CAET sent such concerns in batches to the Roadless Area Conservation project interdisciplinary team in the Washington Office of the Forest Service for review, action, and response.

Comment Response

The interdisciplinary team reviewed the public concern statements along with the sample quotations, considered the substance of the concerns, evaluated whether they triggered a change in the environmental analysis, and drafted responses. For some concerns, they reviewed the original letters or other input to ascertain the full context for the concern statement.

The interdisciplinary team provided any recommendations for improvements to the DEIS analysis or documentation to the leadership of the Forest Service for review, consideration, and action. The agency provided responses to approximately 1,200 consolidated concerns in this Volume of the FEIS.

In general, the agency responded in the following five basic ways to the substantive public comments as prescribed in 40 CFR 1503.4.

- 1. *Modifying alternatives.*** For example, the agency modified alternatives by adding, as possible mitigation, a new exception from the road construction and reconstruction prohibition to provide for future leasing of minerals such as coal and phosphate. The exception could apply to Alternatives 2 through 4.

2. ***Developing and analyzing alternatives not given serious consideration in the DEIS.*** The agency considered but did not analyze in detail a variety of added prohibition alternatives that public comments suggested. It did not add new alternatives in detail, but did fully develop a Tongass Not Exempt Alternative which was a clarified and reformatted description of one that was implicit in the DEIS.
3. ***Supplementing, improving, or modifying the analysis that the DEIS documented.*** The agency improved its analyses in a large number of areas. Some of the more substantial updates were in the Fire Effects sections, the Minerals Effects section, and the Cumulative Effects sections of all resources.
4. ***Making factual corrections.*** The agency made a large number of factual and technical corrections. For example, in the FEIS it removed subjective characterizations and graphical errors, updated the acreages of roadless areas across the country, and updated the corresponding roadless area maps.
5. ***Explaining why the comments do not need further Forest Service response.*** The public submitted a large number of suggestions about national forest and grassland management in general, rather than roadless area conservation in specific. This Volume 3 explains or summarizes in each resource section those comments and why it was not necessary for the agency to analyze or respond to them in further detail. Usually the comments referred to an option or alternative considered but not analyzed in detail, as explained at the end of Chapter 2. In addition, some comments were not substantive, meaning they clearly did not refer to the DEIS, the rule, or roadless areas. In most cases, Volume 3 explained that these were outside the scope of the analysis.

Preceding Chapter 1 of FEIS Volume 1 is a new section titled, “Summary of Changes Between Draft and Final EIS.” For convenience it summarizes the main changes in analysis and documentation that the agency made between the DEIS and the FEIS in response to public comment and other new information.

CAET summarized the entire content analysis process described in this introduction, in the document, *Summary of Public Comment, Proposed Roadless Areas Rulemaking, 1999-2000* (CAET 2000). That document is in the project record.

Further Information

Chapter 1 of FEIS Volume 1 contains a new section that summarizes the public involvement activities that occurred during the DEIS public comment period, entitled “Public Review and Comment on the Draft EIS and Issues Considered.” That summary sets the stage for this Volume 3 of the FEIS – Agency Response to Public Comment.