

# **Roadless Area Project Questions and Answers 11/12/99**

*(These Q&As are based on the best information available to the Forest Service as of 11/12/99. As the Roadless Area Team works through issues raised in public scoping, the analysis necessary for an Environmental Impact Statement, and the Rulemaking process, we expect that new information will surface as part of this process. Based on information from this learning process, additional questions may be answered and some of the existing answers may change. The Forest Service will update these Q&As and post subsequent versions on the web as new information surfaces.)*

## **Policy**

### **What has the President proposed that the USDA Forest Service do?**

On October 13, 1999, the President directed the Forest Service to begin an open and public dialogue about the future of inventoried roadless areas within the National Forest System. The Agency initiated this process by publishing a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) in the Federal Register (October 19, 1999).

### **What is this controversy about? What is its origin?**

Roadless areas have been a subject of public debate and concern for almost 30 years. Roadless areas are National Forest System lands that have remained unroaded for a variety of reasons -- inaccessibility, rugged terrain, or environmental sensitivity. In the 1970s, the Forest Service conducted two Roadless Area Reviews (RARE I and RARE II) to inventory roadless areas of 5,000 acres or larger for their wilderness character and value. Over the years since, some of the areas in the initial inventory have been designated as wilderness by the U.S. Congress. Some have been roaded for management. And, a large number of areas remain roadless. There has been extensive controversy over management of these areas -- lawsuits, appeals, letters, and Congressional hearings. There is a strong need to come to agreement on the future management and protection of these lands.

The Forest Service also has environmental and budgetary concerns about creating roads in these areas. There are more than 380,000 miles of roads on National Forests and Grasslands. However, the agency only receives about 20 percent of the annual funding needed to annually maintain these roads to Federal safety and environmental standards. Overall, the agency estimates an \$8.4 billion backlog on road maintenance and reconstruction. Entries into roadless areas for timber harvesting are expensive, in terms of engineering and environmental analysis costs, and contentious--such decisions are almost always appealed and litigated leading to further delay, cost, and controversy. In addition, roads may contribute to resource degradation. The Agency believes that resources should be invested into projects that have broader support, are less costly, and have fewer environmental impacts than building new roads in roadless areas.

To respond to these concerns, in January 1998, the agency proposed to temporarily suspend road construction and reconstruction in certain unroaded areas; and provided advance notice of revisions to the regulations governing the management of the National Forest System Transportation System. After analyzing public comments, the agency published a final rule (referred to as the “interim rule”) suspending road construction and reconstruction in roadless and other unroaded areas for 18 months beginning in March 1999. The agency received approximately 80,000 public comments on the roads proposal—most had to do with permanently protecting roadless areas.

As a result of these comments the agency is now working on two policies. First, the Forest Service will continue to develop a long-term road policy for the National Forest Transportation System. This policy is designed to improve access to our National Forests by making our existing road system safe, responsive to public needs, environmentally sound, affordable to American taxpayers, and efficient to manage.

Second is the proposed roadless area rulemaking, which addresses the need to deal with the future management and protection of roadless areas. The President’s direction sets in motion a national dialogue to ensure the values of roadless areas that Americans have expressed are addressed.

### **Do the President and the Forest Service have the legal authority to take these actions?**

Yes. This rulemaking will be carried out under existing laws and regulations governing the agency such as the Organic Act, Multiple Use-Sustained Yield Act, National Forest Management Act, National Environmental Policy Act, and ANILCA (Alaska Lands Act). .

### **Shouldn't such a comprehensive process be submitted to Congress?**

The Administration's approach is based on legal authorities already granted to the U.S. Department of Agriculture (USDA) and the Forest Service by Congress. The process will be carried out under existing legal authorities and will involve the public in an open, participatory process.

### **Isn't the White House taking this action purely for political reasons?**

The President’s directive supports the Forest Service commitment to respond to strong public concerns about roadless area management. The Forest Service has exerted strong leadership in the realm of roadless area protection since Chief Dombeck initiated the 18-month suspension of road construction and reconstruction into most roadless areas of the National Forest System. While that rule focused on roads management, the public continued to focus on the question of roadless areas. The agency received more than 80,000 public comments on the interim roads policy, many of them focused on permanently protecting roadless areas. The Forest Service roadless area process is a logical, legal next step which clearly addresses an issue of great importance to the American people, and about which they expect the Forest Service to exercise its management and conservation responsibilities.

## **Process**

### **What does the Notice of Intent say?**

The Forest Service proposes to immediately restrict certain activities, such as road construction and reconstruction, into the unroaded portions of inventoried roadless areas. And, the Forest Service would establish a process to guide local land managers in determining what activities are consistent with maintaining and enhancing ecological and social values of inventoried roadless and unroaded areas.

### **What are the components of the action proposed in the Notice of Intent (NOI)?**

The proposed action in the NOI is divided into two parts. The first part proposes to restrict certain activities such as road construction and reconstruction in the unroaded portions of inventoried roadless areas.

Part two would establish procedures and criteria to be used by each forest to determine what activities are consistent with the important values associated with roadless areas of all sizes – inventoried or not - that maintain or enhance social or ecological attributes. Local forest plan amendment and NEPA processes, both of which require active public collaboration and participation, could be used to implement the procedures and criteria developed in part two. The final rule would delineate the framework for this forest-by-forest implementation process. Public scoping and other public involvement will help to shape the ultimate structure and format of the agency's final rule.

### **What's the timeline of the NOI and EIS to protect roadless areas?**

The NOI provides a 60-day scoping period (ending December 20, 1999). After the end of the comment period the Forest Service will write a draft environmental impact statement (DEIS). The DEIS is expected to be released in the spring of 2000. The Forest Service will provide for extensive public involvement at that time. A final environmental impact statement and final rule in fall of 2000.

### **How is rulemaking different from the Forest Service's usual decisionmaking process under the National Environmental Policy Act (NEPA)?**

Rulemaking is a process where agency procedures become formalized in regulations. Rulemaking is subject to public comment and response by the agency similar to that done for NEPA. A proposed rule is published in the Federal Register and made available for public comment; that is followed by a final rule that responds to comment and explains how public comments were used in developing the final rule. This process is similar to the NEPA process, but normally does not involve in-depth analysis of environmental effects. Where environmental effects are of concern with the proposed rule, NEPA can be integrated with the rulemaking. A draft EIS can accompany the proposed rule and provide environmental, social, and economic information to help the public better understand and respond to the proposed rule. A final EIS can accompany the final rule and serve the same purpose as a draft EIS. In this way, environmental analysis can be integrated with the rulemaking process.

### **What are some reasons to protect Roadless Areas?**

This action is needed to respond to public desires about the conservation and use of National Forest and Grassland resources. There is strong public sentiment for protecting public benefits such as the high quality clean water, biological diversity, wildlife protection, and dispersed recreation found in roadless areas.

Roadless areas serve as reference areas for research, bulwarks against invasive species, and as aquatic strongholds for fishes of great recreational, subsistence, and commercial value. Roadless areas also often provide vital habitat and migration routes for numerous wildlife species and are particularly important for those requiring large home ranges, such as the grizzly bear and the wolf.

The Forest Service does not have the resources to take care of its existing 380,000-mile road system. For example, the agency receives only about 20 percent of the funding it needs to fully maintain roads. The backlog on road reconstruction and maintenance work is approximately \$8.4 billion. Many have questioned whether the Forest Service should build new roads into pristine roadless areas, if it cannot take care of the 380,000-mile road system that already exists.

### **What are inventoried roadless areas? Unroaded areas?**

Inventoried roadless areas are defined as areas of National Forest System land currently inventoried for planning purposes as roadless areas. This inventory is based on individual forest plans, forest plan revisions in progress where the Agency has established an inventory, or other assessments that are completed and adopted by the Agency. RARE II inventories will be used if a forest does not have a more recent roadless inventory which was established based on RARE II information.

Unroaded areas are other areas without classified or authorized roads. Their size must be sufficient enough and in a manageable enough configuration to reflect the inherent values associated with roadless areas.

### **What are some of the positive benefits of roadless areas?**

The values may include, but are not limited to:

- \* Sources of drinking water;
- \* Reference areas for research;
- \* Areas of high or unique biological diversity;
- \* Areas of high biodiversity that provide a bulwark against invasive, noxious, or exotic pest or weed species;
- \* Areas where other roadless lands are scarce;

- \* Areas that provide important historic or potential sources of dispersed recreation;
- \* Areas of cultural or historic importance;
- \* Areas that provide unique or important seasonal habitat for wildlife, fish, and plant species.

**How many acres could potentially be affected?**

Part 1 of the rule could affect approximately 50 million acres of inventoried roadless areas. Roughly 45% of these areas are already in management designations that do not allow for road construction. The agency's data is based on inventories conducted in the 1970s and 1980s and will be refined during the NEPA analysis. The amount of acres affected by part 2 of the rule will be determined in the future through local forest planning.

**How will the public be involved in the decision-making process?**

The Notice of Intent initiated a 60-day scoping period where comments will be received. This will provide the Forest Service an opportunity to better understand the nature and scope of issues that should be addressed in the draft EIS, and to identify the significant social and environmental issues related to the proposed rulemaking. As a demonstration of the seriousness with which we take public opinion on this issue, we will hold public meetings on every National Forest and Grassland. In addition, ten regional and national level meetings are being held. People will have the chance to shape the debate, the alternatives, and the analysis that we conduct.

Public comments will be collected three ways: (1) through these scoping sessions (2) through written comments sent to USDA Forest Service, Attn: Roadless, PO Box 221090, Salt Lake City, UT 84122, and (3) e-mail comments sent to [roadless/wo\\_caet-slc@fs.fed.us](mailto:roadless/wo_caet-slc@fs.fed.us), (4) faxes sent to 801-517-1021.

**Will the agency consider other alternatives before finalizing this rule?**

Yes. The Forest Service proposed in the Notice of Intent to promulgate a rule with two parts. The scope of this rulemaking will be refined after scoping. As know proposed, part1 would restrict certain activities, such as road construction, in unroaded portions of inventoried roadless areas.

Possible alternatives for part 1 may include:

- \* Prohibiting new road construction and reconstruction projects in the remaining unroaded portions of inventoried roadless areas;
- \* Prohibiting new road construction and reconstruction projects and commercial timber harvest in the remaining unroaded portions of inventoried roadless areas;

- \* Prohibiting the implementation of all activities, subject to valid existing rights, that do not contribute to maintaining or enhancing the ecological values of roadless areas in remaining unroaded portions of inventoried roadless areas; and
- \* Making no change in current policy (No Action alternative).

Part 2 could establish national planning criteria and procedures for determining the management of inventoried roadless areas, and for determining whether and to what extent similar protections should be considered for uninventoried roadless areas. After approval of a final rule, the direction for part two is intended to be implemented at the forest plan level through the plan amendment and NEPA process.

Possible alternatives for part 2 may include:

- \* National procedures and criteria that address how land managers at the forest plan level should manage activities, other than those addressed in part one, in inventoried roadless areas;
- \* National procedures and criteria that address how land managers at the forest plan level should manage uninventoried roadless areas so as to protect their unroaded characteristics and benefits.

Possible alternatives include:

- a. Protecting unroaded areas based on their ecological characteristics;
- b. Protecting existing unroaded National Forest System lands that are at least 1,000 acres in size and contiguous to unroaded areas of 5,000 acres or more on all other Federal lands;
- c. Protecting existing unroaded areas of at least 1,000 acres;
- d. No change in current policy (no action alternative).

### **Will this rulemaking lead to a RARE III?**

No. The RARE II process of the 1970s inventoried roadless areas for their wilderness character and value. Part 1 of this proposal is to restrict certain activities such as road construction and reconstruction in inventoried roadless areas.

Part 2 would initiate planning to consider and protect the important social and ecological characteristics of roadless areas regardless of their size. This process could be implemented through forest planning at the local level.

### **How does the roads policy relate to this roadless process?**

Simply put, the proposed long-term roads policy that will soon be released focuses on managing the existing road system. The roadless policy will examine the issue of future management of roadless areas. They are related but separate efforts.

The roads policy does address roadless areas in that it would require managers to go through a specific systematic analysis process prior to building any new roads in roadless areas.

## **What is the science that was used to develop this proposal?**

Most studies related to roads, roadless areas, and aquatic habitat are from the Pacific Northwest and the Columbia River Basin. Nonetheless, scientific evidence from all across the country speaks to the benefits of roadless areas and the impact of roads.

The Federal Ecosystem Management Assessment Team found:

Roads may have unavoidable effects on streams, no matter how well they are located, designed, or maintained.

The Columbia River Basin Scientific Assessment found:

High road densities are correlated with areas that have relatively high risk of fire occurrence (from human caused fires), high hazard ground fuels, and high tree mortality.

Bighorn sheep, mountain goats, lynx, wolverine, bears and marten are particularly sensitive to human activity and need areas of refuge from roads and activities.

About 60% of the best aquatic habitats were found in roadless or very low road density areas.

Forestland and rangeland ecosystems with the highest integrity ratings were those that were less developed and largely unroaded.

Over 80% of the subbasins with the highest forest integrity are comprised of more than 50% roadless areas and wilderness. Conversely, of those subbasins with the lowest forest integrity about 90% were comprised of less than 25% roadless areas and wilderness.

The Sierra Nevada Ecosystem Project found:

Roadless areas allow management activities to occur elsewhere because their presence keeps cumulative effects within acceptable thresholds and aquatic biodiversity areas and late successional forests are anchored in roadless areas.

The Southern Appalachian Assessment found:

Wilderness and roadless areas include more than 10% of the streams that potentially support wild trout. A percentage far higher than the small proportion of the land base in that region that is roadless or wilderness.

**What is the relationship between the draft planning regulations and this roadless proposal?**

The proposed planning rule would rewrite the existing Forest Service planning regulations. The proposed planning rule would make ecological sustainability the primary goal of National Forest System land management. It proposes to accomplish this through greater collaboration and problem solving with the public and other stakeholders, integrating science more effectively into planning, and making the planning process more responsive and adaptive to current problems and opportunities.

In terms of roadless areas, the proposed planning rule provides for identification of and management for unroaded values other than through wilderness designation. It also defines *roadless* and *unroaded*. The proposed roadless rule focuses on limiting certain development activities such as road construction into roadless areas, assessing unroaded values and developing criteria for protecting and enhancing those values. It applies to inventoried roadless and other unroaded areas of the National Forest System lands only.

**How much will this rulemaking process cost and how will it be funded?**

The current estimate is \$6 million to fund this rulemaking. Appropriate funding sources are being determined.

**Are there any exemptions being considered for this proposed rule?**

The intent of the rulemaking is to include all National Forests and Grasslands. However, exemptions may be considered in the development of the alternatives, such as the Tongass National Forest. Exemptions or transitions for newer plans may also be considered in the development of this rule.

**How does this rulemaking deal with the Tongass National Forest ?**

The Forest Service is seeking specific comment on whether the rulemaking should apply to the Tongass National Forest.

**How does this rulemaking overlay with the Dwyer ruling on survey and manage in the Pacific Northwest?**

It does not. The Dwyer ruling dealt with gathering data on species before certain activities could occur in the Pacific Northwest. This process concerns limits on road construction throughout the National Forest System.

**Why was the President's Northwest Forest Plan exempted from the interim 18-month suspension of new road construction in roadless areas but not from this roadless rulemaking proposal?**

The interim rule exempts plans covered by an interagency ecosystem assessment and plan as well as those that were most recently revised. The interim suspension of road construction in roadless areas was intended to provide temporary protection primarily to those roadless areas in forests whose management was guided by older forest plans.

**What is the difference between acres covered by the interim suspension of road construction in roadless areas and in this rulemaking?**

As now proposed in the NOI, the area proposed to be covered by part 1 of this proposed rulemaking is smaller than that covered by the interim rule, because the proposal would only cover inventoried roadless areas, whereas the interim rule covered numerous smaller roadless areas adjacent to inventoried areas. Part 1 could cover approximately 50 million acres. Part 2 could apply to more acreage.

**What changes in management will occur on the ground immediately as a result of this proposal?**

None. The agency has only advanced a proposal that will be finalized through an open and public dialog and NEPA process. It is important to remember that the interim roads rule remains in effect, so for the time being road construction is not allowed in most inventoried roadless areas.

**Access**

**What does this rule do to access? Aren't you shutting out the American people from their own forests?**

Questions regarding access to roadless areas is also important and will be discussed and addressed throughout this process. As described in the NOI, part one of the proposal could lead to restricting certain activities, such as road construction and reconstruction, in the unroaded portions of inventoried roadless areas. Part two could develop procedures and criteria for protecting the values associated with roadless areas. These procedures and criteria would be implemented through subsequent local forest planning efforts. We anticipate that questions about access will most likely be addressed through part two of the proposal. After the sixty day comment period, the Forest Service will develop alternatives to analyze the effects of part one and part two of the Forest Service s proposal. The Forest Service welcomes comments on how the access issue should be addressed in these alternatives.

The Forest Service is a multiple use agency, and it takes providing access the National Forest System very seriously. Indeed, the Forest Service already manages a road system of approximately 380,000 miles, 7,700 miles of scenic byways, about 133,000 miles of trails and more than 23,000 recreation facilities. In fact, over 1.7 million recreation related vehicles per day use National Forest roads. In 1997, an estimated 860 million recreation visits were made to National Forests more than any other jurisdiction or agency. Public use of the public s forests continues to grow. The Forest Service will continue to work hard to ensure that its existing roads and motorized trails are adequately maintained, signed, mapped, and marked for public use and enjoyment.

**Are you banning off road vehicles from roadless areas? Where are they supposed to go if they cannot use these areas?**

The use of off road vehicles in roadless areas is an important issue that will be discussed and considered throughout this process. As described in the NOI, part one of the proposal could lead to restricting certain activities, such as road construction and reconstruction, in the unroaded portions of inventoried roadless areas. Part two could develop procedures and criteria for protecting the values associated with roadless areas. These procedures and criteria would be implemented through subsequent local forest planning efforts. We anticipate that questions about ORV use in roadless areas will most likely be addressed through part two of the proposal. After the sixty day comment period, the Forest Service will develop alternatives to analyze the effects of part one and part two of the Forest Service s proposal. The Forest Service welcomes comments on how ORV use should be addressed in these alternatives.

**There are a number of ski resorts or expansions of ski resorts planned for National Forests, is this an effort to shut them down?**

Skiing remains a legitimate use of National Forests, and issues surrounding ski resorts in roadless areas will be discussed and considered throughout this process. As described in the NOI, part one of the proposal could lead to restricting certain activities, such as road construction and reconstruction, in the unroaded portions of inventoried roadless areas. Part two could develop procedures and criteria for protecting the values associated with roadless areas. These procedures and criteria would be implemented through subsequent local forest planning efforts. After the sixty day comment period, the Forest Service will develop alternatives to analyze the effects of its proposal. The Forest Service welcomes comments on how ski resorts and the expansion of ski resorts should be addressed in these alternatives.

**Is this rulemaking going to affect legal rights of access?**

No. Forest Service regulations and policy ensure access provided by statute, treaty or pursuant to reserved or outstanding rights, and this rule would not affect pre-existing rights. The rule also would not affect pre-existing access rights for permit holders or for projects already under contract.

**Will this rulemaking change types of access allowed in certain areas?**

Legal access rights will be preserved. Part 2 of the rulemaking may influence certain activities that are consistent or inconsistent with conserving or enhancing roadless area values. We anticipate that such decisions, and their effects, will be examined and made through local decision-making processes.

**How many roads will be closed as a result of this rulemaking?**

None through the proposed roadless rulemaking. The Forest Service proposes to restrict certain activities such as road construction and reconstruction in inventoried roadless areas. However, the agency's soon-to-be-released roads policy may lead to more efficient use of the existing road system and decommissioning of unneeded roads through local planning and decisionmaking.

**Recreation**

**What are the effects of this rule on access to National Forests for hunting, fishing, hiking, camping, and other recreational uses?**

This rule will not affect current recreational uses of the National Forests such as camping, hunting, hiking, and similar activities. Part 2 could identify a process and criteria where local people can participate in local forest planning to help maintain or enhance the values that make roadless areas special and important. One benefit of the rule would be to protect the availability and quality of the type of recreation that roadless areas generally provide, which is to offer an **alternative** to roaded recreation

**Are you banning off road vehicles from roadless areas? Where are they supposed to go if they cannot use these areas?**

The rule proposed in the NOI would not ban off road vehicles from roadless areas. Part 1 merely proposes to restrict certain activities such as road construction and reconstruction into the unroaded portions of inventoried roadless areas. Alternatives considered in part 2 could affect off-road uses of roadless areas, but that likely would be determined and implemented at the local level through forest planning with full public participation.

**There are a number of ski resorts or expansions of ski resorts planned for National Forests, is this an effort to shut them down?**

No. Skiing remains a legitimate use of National Forests. Part one proposes to restrict certain activities such as road construction and reconstruction into the unroaded portions of inventoried roadless areas. Part two may affect development projects or ski expansions into roadless areas, but that likely would be determined and implemented at the local level through local forest planning with full public participation.

### **Does this process add to wilderness areas?**

No. The rule will not designate or attempt to identify any additional areas as suitable for wilderness. Only Congress can designate new wilderness areas.

### **Economics and Timber Harvest**

#### **How many jobs will this rulemaking cost?**

Job changes in natural resource industries result from a multitude of factors, including increased mechanization, reliance on imports, market fluctuations, and supply factors. National Forest management can contribute to the supply factor. In this rulemaking, both positive and negative effects on employment will be analyzed in the EIS. We recognize that there may well be specific locations where the impact of job losses is acutely felt. Through our economic development programs, the Administration has lent strong support to these communities' efforts to revitalize their economies and retrain their workers.

#### **How much has timber harvest declined under this Administration and what has been the economic impact?**

The timber harvest from National Forests has declined by about 70 percent over the past decade--from approximately 12 billion board feet in 1989 to 3.4 today. Job loss in the timber industry is the result of a multitude of factors, including increased mechanization, growing reliance on imports, and market fluctuations. Much of the lost volume from National Forests was made up from State lands and private timber company lands, thereby helping to minimize job loss associated with the slow-down of timber production from National Forests. The economic impact of the decline in timber harvest levels in some rural timber-dependent communities has been severe. Through our economic development programs, the Administration has lent strong support to these communities' efforts to revitalize their economies and retrain their workers.

#### **What is your projection for timber harvest of National Forests in the future?**

We anticipate that timber harvests in the future will remain fairly stable. The composition of the timber sale program will continue to change, however. Increasingly, the Forest Service is using timber harvest as a tool to help restore watersheds affected by past management practices and fire suppression. As such the agency is harvesting a smaller number of old-growth aged sawlogs and more small diameter trees.

### **How will including the area covered by the President's forest plan affect timber harvest?**

The effects of including the Pacific Northwest in the rule will be analyzed in the EIS. The environmental assessment conducted for the Interim Roads Rule provides some relative comparisons of the timber harvest effects. Areas exempted in the interim rule included the President's Forest Plan for Oregon and Washington. This exemption for the Pacific Northwest Plan permitted an additional 18 to 26 million board feet to be harvested than would have been possible had the plan not been implemented. This information is only useful for illustrative purposes; the actual effects will not be known until the EIS is complete. It is important to note that most of the roadless areas in the Pacific Northwest plan area are also within Late Successional Old Growth Reserves, and would not be subject to road construction and timber harvest even without a roadless rule.

### **How will this rule affect payments to states?**

Forest Service leadership recognizes the serious impacts on small communities in natural resource-dependent counties and states with substantial reliance on the 25% funds and Payment in Lieu-of-Taxes programs. Accordingly, the agency has initiated other efforts to stabilize these payments and make them permanent through a legislative process submitted with the agency's budget. The House and Senate are considering options to stabilize payments to states, as well.

The agency's environmental impact analysis will estimate the actual effects on commodity production. The effects are not expected to be significant nationally; however, certain timber-dependent communities adjacent to roadless areas could be more directly affected in production of goods and services.

## **Planning Process**

### **How does this rulemaking affect forests already in the forest plan revision process?**

Thirty-five forests are currently revising their forest plans. Two are scheduled to complete their revision this fiscal year. This rulemaking does not have any immediate effect on ongoing forest plan revisions. However, once a final rule is issued, forest plan revisions in progress at that time could be affected. This rulemaking will consider alternative transition options for implementing the rule.

### **Will this rulemaking amend existing Forest Plans?**

The intent is to develop a rule that would not itself amend forest plans. As currently contemplated any forest plan amendments would be done at the local level with full public participation.

## **Forest Health**

### **How do roadless areas relate to landscape fragmentation concerns?**

One of the primary reasons it is timely for us to analyze how best to protect roadless values is because of the rapid growth in many rural areas causing increased fragmentation of open spaces and undeveloped habitat.

### **How will protection of roadless areas affect forest health?**

Previous large-scale landscape studies, such as the Interior Columbia Basin Ecosystem Management Project and others, indicate that a large percentage of the areas for critical forest health concerns are in already-roaded areas. The Forest Service believes that the most accountable course is to first focus on treating forest health issues in already roaded areas, before considering building new roads in roadless areas to address the same concern. The environmental impact statement for this proposal will be addressing the effects of various strategies on forest health, hazardous fuel reduction and other issues.

### **Will it be acceptable to conduct forest health related activities such as thinning, insect and disease management, or stewardship projects in roadless areas?**

A variety of activities will be analyzed as part of this rulemaking, and ultimately procedures and criteria could be developed that would be applied through forest planning at the local level. The acceptability of forest health related activities will be evaluated in alternatives considered in the EIS. Until those analyses occur, existing forest plan direction will apply. The direction of the interim suspension on road building will apply until August 2000.