

CHAPTER 2. ALTERNATIVES, INCLUDING THE PROPOSED ACTION

INTRODUCTION

This chapter provides a full description of each of the three alternatives considered in detail. Maps associated with each alternative are located in the map packet. This chapter also describes the alternatives comparatively, by sharply defining the differences between each alternative, to provide the decision maker and the public with a clear basis for choice among alternatives.

Alternative comparison tables at the end of this chapter summarize the differences in the design of each alternative as well as the environmental consequences (effects) of each alternative based on the detailed analysis of environmental consequences contained in chapter 3.

The three alternatives analyzed in this EIS are:

- **Alternative 1: No Action, the 2001 Roadless Rule⁸.** This alternative retains the inventoried roadless area (IRA) boundaries and roadless area management provisions contained in the current 2001 Roadless Rule, for management of roadless areas on National Forest System (NFS) land in Colorado.
- **Alternative 2: Proposed Action, the Colorado Roadless Rule.** This alternative establishes a state-specific roadless rule for Colorado that modifies the roadless area boundaries and roadless area management provisions from the existing 2001 Roadless Rule, primarily to provide for additional management flexibility in roadless areas.
- **Alternative 3: Forest Plans.** This alternative establishes a state-specific roadless rule for Colorado that exclusively uses management direction contained in the land management plans (forest plans) for each of the national forests in Colorado.

The range of alternatives is designed to adequately address the purpose and need and issues described in chapter 1. Each alternative offers a different degree of conservation of roadless characteristics and values, primarily by providing a different mix of limitations on land use activities, specifically road building and tree cutting that may occur in roadless areas. The alternatives also provide differences in roadless area boundaries.

The design of the proposed Colorado Roadless Rule is predicated on Colorado's petition for a state-specific rule as described in chapter 1. The proposed Roadless Rule also retains many of the prohibitions and permissions associated with road building and tree-cutting activities that are in the current 2001 Roadless Rule. Refer to chapter 1 for descriptions of the background, purpose and need, decision framework, scope and applicability of the proposal, public involvement activities, and identification of issues related to the proposed action.

⁸ "2001 Roadless Rule" refers to Federal regulations in the Code of Federal Regulations at 36 CFR 294- Special Areas, regarding Forest Service management of roadless areas.

ALTERNATIVES CONSIDERED BUT ELIMINATED FROM DETAILED STUDY

Federal agencies are required by the National Environmental Policy Act (NEPA) regulations to explore and evaluate all reasonable alternatives to a proposed action and to briefly discuss the reasons for eliminating any alternatives that were not developed in detail (40 CFR 1502.14). However, based on the evaluation of public comments received during scoping on this proposed rulemaking action and the identification of issues (chapter 1), no reasonable alternatives were identified to be considered but eliminated from detailed study. The no-action alternative (alternative 1) addresses some of the issues raised about the proposed action (alternative 2), and the forest plans alternative (alternative 3) addresses other issues raised. Alternatives 2 and 3 both address the purpose of and need for proposing a change from the current 2001 Roadless Rule for managing roadless areas in Colorado.

ALTERNATIVES CONSIDERED IN DETAIL

This section begins by describing the features that are common to all alternatives analyzed in detail in this EIS, followed by detailed descriptions of each alternative with a focus on the key differences among the alternatives.

Features Common to All Alternatives

Federal and State Requirements

Management of NFS lands in Colorado is governed by a variety of federal land management statutes (laws), regulations (also called rules), executive orders, and the Forest Service Directive System (manuals and handbooks). In addition, some state and local laws and regulations apply on NFS lands within the state. All alternatives in this analysis assume that these governing authorities are not affected. One example of a federal statute is the General Mining Law of 1872. Under the General Mining Law and other related laws and regulations, all alternatives would allow for road construction and use within roadless areas as needed for the exploration and development of valid claims of locatable (“hard rock”) minerals. Similarly, the right to construct and use roads in roadless areas where necessary to develop valid existing mineral interests that underlie Forest Service surface ownership would be unchanged under all alternatives.

Forest Plans

The National Forest Management Act (NFMA) and its implementing regulations at 36 CFR, part 219, obligate the Forest Service to develop, amend, or revise forest plans. All alternatives, unless otherwise superseded by a roadless rule, assume that direction set forth in forest plans for the national forests in Colorado would continue to govern project and activity decision-making on NFS lands, including roadless areas. The analysis in this EIS is predicated on current direction contained in approved forest plans for national forests in Colorado, and it assumes that projects and activities will be consistent with plan components. Several forest plans for national forests in Colorado are undergoing revision concurrently with the preparation of this EIS; however, existing forest plan direction is used in this analysis.

None of the alternatives would compel the Forest Service to amend or revise any forest plan. None of the alternatives would limit the authority of a responsible official to amend or revise a forest plan in a manner that establishes additional prohibitions or constraints regarding project and activity decision-making within roadless areas. Under all alternatives, 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 constrains road construction in roadless areas would continue to apply. Thus, forest plan constraints on activities in roadless areas would apply unless expressly superseded by the provisions of the rule. Future forest plan amendments may further constrain or reduce project activity, if they are more restrictive than the rule provisions.

Project-Specific Environmental Analysis

All future proposals for road construction and reconstruction, tree-cutting and removal, and other activities that are permissible under any alternative, must undergo appropriate environmental analysis and decision-making processes pursuant to NEPA and its implementing regulations. The environmental analysis process includes opportunity for public review and comment.

Reserved and Outstanding Rights

Under all alternatives, the exercise of outstanding rights for access, occupancy, and use of NFS lands within roadless areas would not be affected. These include those that exist by law, treaty rights or other authority. They include but are not limited to the right to construct roads or provide other reasonable access across NFS lands for the purpose of access to: private property, valid mining claims for locatable minerals, and land uses protected by American Indian treaty rights.

Existing Land Use Authorizations

Authorizations" refer to land uses federally authorized under a permit, contract, or similar legal instrument. There are numerous types of lands and recreation-related special use permits, along with a variety of contracts and leases, issued for occupancy and use of NFS lands. All of the alternatives allow for the continuation, transfer, or renewal of valid and existing land use authorizations for activities in roadless areas, for those authorizations that exist at the time the applicable roadless rule becomes effective. For clarification, "existing" authorizations under the 2001 Roadless Rule (alternative 1) are those authorizations issued prior to January 12, 2001. "Existing" authorizations under the proposed Colorado Roadless Rule (alternative 2) would be those that currently exist or are issued prior to adoption of the final rule.

These discretionary land use authorizations made by the Secretary of Agriculture or his designated Forest Service official are for activities not covered by reserved or outstanding rights. These authorized activities may continue to occur in roadless areas, subject to limitations imposed by forest plans, project-level decisions, and applicable laws, regulations, and Forest Service directives. The alternatives are designed primarily to govern road building and tree-cutting activities in roadless areas.

Examples of land use activities not specifically prohibited or restricted by roadless rulemaking under any alternative include but are not limited to the following:

- Use of roads and trails, including motorized travel on roads and trails

- Livestock grazing
- Recreational activities, including but not limited to hunting, fishing, hiking, camping, mountain biking, and skiing
- Prescribed burning, brush-cutting, and similar vegetation management treatments other than tree-cutting, sale, or removal

Congressional Designations

There are nine congressionally designated areas that were included within the IRA boundaries established under the 2001 Roadless Rule. Some were congressional designations that pre-date the 2001 Rule but were not reflected in IRA maps submitted for the 2001 Rule, and others were congressional designations made after promulgation of the 2001 Roadless Rule. The final maps of the IRAs for the 2001 Roadless Rule, as published in volume II of the Final EIS for Roadless Area Conservation (USDA Forest Service 2000a), include approximately 184,000 acres of congressionally designated areas that overlap IRAs on NFS lands in Colorado. Management of congressionally designated areas is governed by legislated direction that overrides rulemaking direction for management of roadless areas.

Therefore, for the purposes of this analysis, all existing congressionally designated acres are removed from the roadless areas for all alternatives. This provides a consistent framework upon which to compare the consequences of each alternative. The IRAs described in the 2001 Roadless Rule Final EIS publication and associated map database cover approximately 4.43 million acres, while the roadless areas described in this EIS cover approximately 4.25 million acres, owing to removal of the congressionally designated lands. Table 4 displays the congressional designations and their associated acreages and locations with respect to the IRAs and national forest administrative units that they overlap⁹. The laws that designated these areas and other details about these designated areas are described in chapter 3, in the Wilderness and Recommended Wilderness section and Other Congressionally Designated Areas and Trails section. These changes in IRA acres are also displayed in appendix A.

⁹ Throughout the EIS, a national forest administrative unit refers to one or more national forests that are administered as a consolidated unit under a single forest plan.

Table 4. Congressional designations and acreages by inventoried roadless area and national forest

Congressional designations	Congressionally designated acres in IRAs	2001 IRA name(s)	National forest administrative unit
Bowen Gulch Protection Area	8,600	Never Summer Adjacent Area	Arapaho and Roosevelt
Indian Peaks Wilderness Additions	3,000	Indian Peaks Adjacent Area	Arapaho and Roosevelt
James Peak Protection Area	11,300	James Peak and Indian Peaks Adjacent Area	Arapaho and Roosevelt
James Peak Wilderness	14,300	James Peak	Arapaho and Roosevelt
Fossil Ridge Recreation Management Area	39,800	Crystal Creek	Grand Mesa, Uncompahgre, and Gunnison
Roubideau Protection Area	18,600	Roubideau	Grand Mesa, Uncompahgre, and Gunnison
Tabeguache Protection Area	8,900	Tabeguache	Grand Mesa, Uncompahgre, and Gunnison
Spanish Peak Wilderness	18,700	Spanish Peaks and Spanish Peaks Proposed	Pike and San Isabel
Piedra Special Management Unit	60,400	Piedra	San Juan
TOTAL (rounded to nearest 100)	184,000		

IRA acres are rounded to nearest 100 and the total is rounded to the nearest 1,000 acres.

Totals may not add due to rounding.

(Source: Roadless Area GIS database, April 2008.)

Roadless Areas in Colorado

All alternatives identify specific NFS lands in Colorado to be managed as roadless areas. Generally, they have a minimum size of 5,000 acres, unless they are adjacent to existing wilderness and contain many of the roadless area characteristics, as described in chapter 1.

For purposes of this analysis, alternatives 1 and 3 share common roadless area boundaries, referred to in this EIS as inventoried roadless areas (IRAs). Alternative 2 proposes modifications of those roadless area boundaries and are referred to in this EIS as Colorado Roadless Areas (CRAs). Table 5 provides an overview of the IRA and CRA acres, by national forest administrative unit. Under any of the alternatives, 29 to 31 percent of the total NFS lands in Colorado are within identified roadless areas.

Table 5 shows that 2 percent fewer acres of NFS lands in Colorado would be in roadless areas under alternative 2 compared to alternatives 1 and 3. The change in acreage for CRAs is a result of correcting mapping errors, not including areas that do not meet the criteria for roadless, not including ski areas, and adding new roadless acres as explained later in the detailed description of alternative 2. Also, the acres included and not included in IRAs compared to CRAs, along with the names of IRAs and CRAs, are displayed in appendix A.

Table 5. Acreages and percentages of roadless area in Colorado under each alternative, by national forest

National forest administrative unit	NFS acres in Colorado	Alternatives 1 and 3		Alternative 2	
		IRA Acres	Percent of NFS acres in IRAs	CRA Acres	Percent of NFS acres in CRAs
Arapaho and Roosevelt	1,537,000	354,000	23	350,000	23
Grand Mesa, Uncompahgre, and Gunnison	2,974,000	1,060,000	36	853,000	29
Manti – La Sal	27,000 ¹	11,000	41	8,000	30
Pike and San Isabel	2,230,000	669,000	30	674,000	30
Rio Grande	1,823,000	530,000	29	518,000	28
Routt	1,125,000	442,000	39	434,000	39
San Juan	1,879,000	544,000	29	558,000	30
White River	2,286,000	640,000	28	636,000	28
Total²	13,881,000	4,249,000	31	4,031,000	29

¹ The Manti-La Sal is a 1.4-million-acre national forest located mostly in Utah, with only 2 percent of those acres located in Colorado.

² Totals may not add due to rounding to nearest 1,000 acre.

(Source: Roadless Area GIS database, April 2008.)

State-Specific Rule

If the Secretary of Agriculture promulgates a state-specific rule for Colorado, the state-specific rule would not be affected by any subsequent reconsideration, revision, or rescission of the 2001 Roadless Rule.

ALTERNATIVE 1: NO ACTION – THE 2001 ROADLESS RULE

The no-action alternative provides a baseline for comparing the environmental consequences of the proposal and any other alternatives, in accordance with NEPA regulations at 40 CFR 1502.14(d). In addition, this alternative is responsive to significant issues regarding the proposed Colorado Roadless Rule (chapter 1). It addresses issues about how the proposed rule would expand circumstances in which roading and tree-cutting activities may occur in roadless areas. The no-action alternative is the most constrained in terms of circumstances for road building and tree-cutting activities within roadless areas.

The alternative reflects current management under the 2001 Roadless Rule, which was promulgated to ensure “that inventoried roadless areas will be managed in a manner that sustains their values now and for future generations” (Fed.Reg. Vol. 66 No. 9, 3243-3273). The 2001 Roadless Rule established general prohibitions on road building and tree-cutting and removal (also called timber harvest) within IRAs, while permitting those activities under certain circumstances.

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 roadless areas in Colorado and allow the provisions of the 2001 Roadless Rule to continue. This option would neither adopt nor reject the 2001 Rule; however, the 2001 Rule would remain operative for these

lands, subject to the various ongoing lawsuits. The 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 Roadless Rule in place at this time. This EIS addresses both possible outcomes for alternative 1.

Roadless Areas

Under this alternative, the roadless areas consist of IRAs identified in the 2001 Roadless Rule. The IRAs analyzed as part of this alternative include approximately 4.25 million acres of NFS lands in Colorado (table 6). The IRAs are based on the roadless inventories from forest plans that either were in effect or had undergone public comment at the time the 2001 Rule was developed. For the Grand Mesa, Uncompahgre, and Gunnison, Manti-La Sal (within Colorado), Pike and San Isabel, and San Juan National Forests, the IRAs are composed of roadless area inventories completed (and manually mapped) in the 1970s, as part of the Roadless Area Review and Evaluation processes (commonly referred to as RARE II). For other national forests that completed forest plan revisions – the Rio Grande, Arapaho and Roosevelt, Routt, and White River National Forests – the IRAs adopted in the 2001 Roadless Rule consisted of the roadless area inventories completed during those forest plan revision processes (approximately 1995 to 2002).

The IRAs under this alternative also do not reflect changes that have occurred from land ownership adjustments or new mapping technologies, including additional acres with roadless characteristics identified outside IRAs.

Management of Roadless Areas

With certain exceptions, the 2001 Roadless Rule prohibits two main types of activities within IRAs: (1) road construction and reconstruction, and (2) tree-cutting, sale, or removal (called timber harvest in the Rule).

Road Construction and Reconstruction

The 2001 Roadless Rule generally prohibits road construction or reconstruction (also called roading) within IRAs, and does not distinguish between permanent or temporary roads; however, the 2001 Rule does provide exceptions to this general prohibition. Table 6 shows the circumstances under which road construction or reconstruction would be allowed in IRAs under the no-action alternative. The text includes some minor paraphrasing for readability. The complete text of the 2001 Roadless Rule can be found in the Federal Register (Vol. 66 No. 9) and in regulations at 36 CFR Part 294.

Table 6. Alternative 1, circumstances in which road construction and reconstruction may occur in inventoried roadless areas

Description
<ul style="list-style-type: none"> • Where a road is needed to protect public health and safety in cases of imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property. • Where a road is needed to conduct a response action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), or to conduct a natural resource restoration action under CERCLA, Section 311 of the Clean Water Act, or the Oil Pollution Act. • Where a road is needed pursuant to reserved or outstanding rights, or continuance of existing land use authorizations. • Where road realignment is needed to prevent irreparable resource damage that arises from the design, location, use, or deterioration of a NFS road that cannot be mitigated by road maintenance. • Where road reconstruction is needed to implement a road safety improvement project on a forest road determined to be hazardous on the basis of accident experience or accident potential on that road. • Where the Secretary of Agriculture determines that a Federal Aid Highway project, authorized pursuant to Title 23 of the United States Code, is in the public interest or is consistent with the purposes for which the land was reserved or acquired and no other reasonable and prudent alternative exists. • Where a road is needed in conjunction with the continuation, extension, or renewal of a mineral lease issued prior to adopting the 2001 Rule (January 12, 2001), and includes any new lease issued immediately upon expiration of an existing lease. Such road construction or reconstruction must be conducted in a manner that minimizes effects on surface resources, prevents unnecessary or unreasonable surface disturbance, and complies with all applicable forest plan direction, regulations, and laws. These roads must be obliterated when no longer needed for the purposes of the lease or upon termination or expiration of the lease, whichever is sooner.

Tree-cutting, Sale, or Removal

The 2001 Roadless Rule generally prohibits timber harvest (also referred to in this EIS as tree-cutting, sale and removal). The 2001 Roadless Rule specifies exceptions to this general prohibition where one of four circumstances is met. Table 7 displays the circumstances in which tree-cutting, sale, or removal would be allowed in IRAs under this alternative. The table paraphrases some of the rule language for purposes of readability in this EIS.

Table 7. Alternative 1, circumstances in which tree-cutting, sale, or removal would be allowed in inventoried roadless areas

Description
<ul style="list-style-type: none"> • The cutting, sale, or removal of generally small-diameter timber may occur in IRAs where needed to maintain or improve threatened, endangered, proposed, or sensitive species habitat, consistent with maintaining or improving roadless area characteristics defined in §294.11. • The cutting, sale, or removal of generally small-diameter timber may occur in IRAs where needed to maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects, within the range of variability that would be expected to occur under natural disturbance regimes of the current climatic period, consistent with maintaining or improving roadless area characteristics defined in §294.11. • The cutting, sale, or removal of timber may occur in IRAs where it is incidental to the implementation of a management activity not otherwise prohibited by this subpart. • The cutting, sale, or removal of timber may occur in IRAs where needed for personal or administrative uses provided for in 36 CFR Part 223. • The cutting, sale, or removal of timber may occur within portions of IRAs where roadless characteristics have been substantially altered by the construction of a NFS road and subsequent timber harvest. Both the road construction and timber harvest must have occurred after the IRAs were established and prior to adoption of the 2001 Rule (January 12, 2001).

Additional Provisions

The 2001 Rule does not revoke, suspend, or modify any permit, contract, or other legal instrument authorized prior to January 12, 2001. Also, the 2001 Rule does not revoke, suspend, or modify any project or activity decision made prior to January 12, 2001. The 2001 Roadless Rule contains other provisions related to managing specific land use activities within IRAs, which were described under Features Common to All Alternatives.

ALTERNATIVE 2: PROPOSED ACTION – COLORADO ROADLESS RULE

Alternative 2 is the proposed action, also called the proposed Colorado Roadless Rule. This proposal was cooperatively developed by the Forest Service and the State of Colorado, to address the specific purpose and need described in chapter 1. The proposed rule is intended to manage roadless areas with flexibility under certain circumstances to address unique State and local land management challenges, while continuing to conserve roadless values and characteristics into the future.

The Colorado Roadless Rule would supersede forest plan direction for road construction and reconstruction and tree-cutting in Colorado roadless areas, except where forest plan direction is more restrictive. The proposed rule includes provisions previously described in Features Common to All Alternatives.

If adopted, the Colorado Roadless Rule would not be subject to or affected by subsequent reconsideration, revision, or revocation of the 2001 Roadless Rule.

Roadless Areas

Under the proposed action, approximately 4,031,000 acres of NFS lands in Colorado would be identified in the Colorado Roadless Rule as Colorado roadless areas (CRAs). The CRAs in this

alternative exclude the congressionally designated areas that overlap portions of the original 2001 Roadless Rule IRAs. Further, as requested by the state in its petition, this alternative incorporates updated roadless area evaluations from the four national forests currently completing revisions, as well as roadless area evaluations and inventory updates completed on all the national forests in Colorado as part of this proposed rulemaking process. The CRAs are designed to eliminate inconsistencies between roadless characteristics and existing conditions in roadless areas. The CRAs are also designed to use the most updated land ownership boundaries, roads inventories, and mapping technologies available, in accordance with the Colorado Roadless Petition and the purpose of and need for this proposed action.

In establishing CRAs for the proposed Colorado Roadless Rule, this alternative does not include 520,800 acres of substantially altered land (including corrections for mapping errors and landownership boundaries), and does not include 8,200 acres within existing ski permits or ski area development allocations in the forest plans. The substantially altered lands are those that do not have roadless area characteristics, primarily because of roads and timber harvest activities that have occurred in the area. The 8,200 acres of ski area terrain not included in CRAs include 6,600 acres in ski areas under existing permits and 1,600 acres outside permit boundaries but within forest plan allocations for future ski area development (see Developed Ski Areas section in chapter 3). The CRAs under this alternative include approximately 309,000 acres of unroaded NFS lands outside the current IRAs that have roadless characteristics that would be conserved under the proposed Colorado Roadless Rule.

This alternative specifically identifies 29,000 acres in CRAs on the Grand Mesa, Uncompahgre, and Gunnison National Forests as the North Fork coal mining area, within which certain roadless area management circumstances would apply (see map in the map packet showing the coal reserve areas).

Alternative 2 allows for the Chief of the Forest Service to make administrative corrections to the maps after providing public notice. Administrative corrections include, but are not limited to, adjustments that remedy clerical, typographical, mapping errors, improvements in mapping technology, or congressional designations. In addition, the Chief of the Forest Service may add to, remove from, or modify CRAs based on public need or changed circumstances. If such modification would result in a significant change, public involvement (notice and comment) comparable to that required for rule promulgation would be conducted. At least 30 days public notice would be given prior to any non-significant modification of the roadless inventory.

In summary, the proposed Colorado Roadless Rule identifies approximately 4.031 million acres of NFS land in Colorado to be managed as CRAs. Details of acreage adjustments by forest are displayed in appendix A, and CRAs are displayed in the alternative 2 map in the map packet.

Management of Roadless Areas

Similar to the 2001 Roadless Rule, alternative 2 prohibits road construction and reconstruction and tree-cutting, sale, and removal, except under certain circumstances in which roading and tree-cutting may occur in the CRAs. Alternative 2 expands upon the circumstances listed for alternative 1, to provide greater management flexibility to address serious forest health concerns, wildfire hazards, and demands for coal, water, and utilities.

Where forest plan direction applicable to CRAs is more constrained than the proposed rule, the forest plan direction would apply. Forest plans would continue to be subject to change through amendments or revisions, as previously described.

Road Construction and Reconstruction

Alternative 2 generally prohibits road construction or reconstruction within CRAs, but it does provide for exceptions to this general prohibition, provided road construction or reconstruction is not otherwise restricted under the applicable forest plan. The circumstances under which road construction or reconstruction would be allowed are described in table 8. One of the differences under this alternative, when compared to alternative 1, is there are two circumstances allowing road construction where the roads constructed are limited to temporary roads (with some circumstances specific to long-term temporary roads).

Under alternative 2, a road, whether it be a forest road (National Forest System road) or a temporary road, may be constructed under the same circumstances as defined in alternative 1, although a circumstance related to utilities and water conveyances has been added. Utilities and water conveyance structures are defined as facilities associated with the transmission and distribution of electricity and water across National Forest System lands. Utilities are defined as existing and future powerlines. Water conveyance structures are defined as existing and future diversion structures, headgates, pipelines, ditches, canals, and tunnels; the term water conveyance structure does not include reservoirs.

Roads built for access to existing oil and gas leases as of the date of the Colorado Rule and roads built to accommodate coal mining exploration and coal-related surface activities in the North Fork coal mining area will be considered forest roads, thus part of the National Forest System. In the North Fork coal mining area, roads constructed pursuant to rights granted under a coal lease for the purposes of methane removal from underground mines may be used by an oil and gas lessee for the purposes of collecting and transporting coal mine methane if applicable. Roads built for access to existing oil and gas leases and coal mining and related surface activities, will be decommissioned and the affected landscape restored when the road is no longer needed or upon termination of the license or lease.

There are several circumstances that allow only temporary roading to occur, some which are specific to long-term temporary roads that may be needed in support of leaseable mineral (energy resource) operations. While temporary roads are typically defined as short-term roads, roads needed for oil, gas, or coal operations are defined as long-term temporary roads, as they would be expected to be in place throughout the lease period.

Alternative 2 further specifies that the responsible official may consider construction of a temporary road only after reviewing and rejecting other access options, resource and community protection needs, and consistency with applicable forest plans. If it is determined that a temporary road is needed, construction must be conducted in a manner that minimizes effects on surface resources, prevents unnecessary or unreasonable surface disturbances, and complies with all applicable lease requirements, forest plan direction, regulations, and laws. All roads constructed in CRAs under all circumstances will be closed to public motor vehicle use, and may only be used for authorized or administrative purposes.

When temporary roads are no longer needed for the established purpose, or upon termination or expiration of the authorized use (whichever is sooner), those roads shall be decommissioned pursuant to regulations at 36 CFR 294, and the affected landscape restored. This applies to all

temporary roads, whether defined as long-term or short-term temporary roads. Decommissioning shall be designed considering safety, costs, and impacts on land and resources (see 16 USC 1608) to achieve complete stabilization and restoration to a condition generally consistent with the preexisting roadless characteristics. Like all alternatives, any temporary roads built in roadless areas with the intent they be decommissioned upon termination or expiration of the authorized use would not cause a roadless area to lose its status as a roadless area.

Table 8 describes circumstances where road construction or reconstruction is allowed under alternative 2. The descriptions include some minor paraphrasing for readability in this EIS. Like all the other alternatives, alternative 2 would allow roads to be constructed or reconstructed in roadless areas under certain circumstances, such as those needed for:

- Emergency environmental response
- Reserved and outstanding rights
- Existing land use authorizations
- Road-related resource damage
- Certain federal highway projects
- Road traffic safety
- Reasonable access to leaseable minerals in existing lease areas (long-term temporary roads may be built)

Unlike alternative 1, alternative 2 adds circumstances allowing road building in CRAs to support future authorizations of electrical utility and water conveyance structures, subject to applicable forest plan direction, and to support future coal leases in the North Fork coal mining area. The proposed Colorado Roadless Rule also includes circumstances allowing temporary road building in CRAs to support community wildfire protection plans or wildland-urban interface fuels projects, if the applicable forest plan would allow the action.

Table 8. Alternative 2, circumstances in which road construction and reconstruction would be allowed in roadless areas

Description
Roads
<ul style="list-style-type: none"> • Where a road is needed to conduct a response action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), or to conduct a natural resource restoration action under CERCLA, Section 311 of the Clean Water Act, or the Oil Pollution Act. • Where a road is needed pursuant to reserved or outstanding rights, or continuance of existing land use authorizations. • Where road realignment is needed to prevent irreparable resource damage that arises from the design, location, use, or deterioration of a NFS road that cannot be mitigated by road maintenance. • Where road reconstruction is needed to implement a road safety improvement project on a forest road determined to be hazardous on the basis of accident experience or accident potential on that road. • Where the Secretary of Agriculture determines that a Federal Aid Highway project (pursuant to Title 23 of the United States Code) is in the public interest or is consistent with the purposes for which the land was reserved or acquired and no other reasonable and prudent alternative exists. • Where a road is needed to allow for construction, reconstruction, or maintenance of existing or future authorized utility and water conveyance structures, if consistent with the applicable forest plan.
Temporary Roads Only
<ul style="list-style-type: none"> • Where a road is needed for treatment actions and in areas identified in a community wildfire protection plan as defined in section 101(3) of the Healthy Forest Restoration Act of 2003 (Public Law Number 1080148) or, if a community wildfire protection plan is not present, within areas of the wildland-urban interface as defined in section 101(16) of the Healthy Forest Restoration Act of 2003. • Where a road is needed for public health and safety in cases of threat of flood, fire, or other potential catastrophic event that without intervention, would cause the loss of life, or property. • Where a road is needed in conjunction with the continuation, extension, or renewal of an oil and gas lease, including construction of infrastructure necessary to transport the product on lands under an existing lease as of the effective date of this rule. Any roads constructed pursuant to rights granted under an oil and gas lease shall be decommissioned and the affected landscape restored when the road is no longer needed to facilitate oil and gas activities or upon termination of the lease. Long-term temporary roads may be built in CRAs for this purpose. • Where a road is needed in conjunction with existing or future coal leases, for coal exploration and development activities on certain CRA lands in the North Fork coal mining area (shown on a coal reserves map in the map packet). In the North Fork coal mining area, roads constructed pursuant to rights granted under a coal lease may be used by an oil and gas lessee for the purpose of collecting and transporting methane from the coal mines. These roads shall be closed to all motorized vehicles not specifically used for the purpose of access, except for administrative use by the Forest Service and other agencies with jurisdictional authority over coal mining, including emergency response. Long-term temporary roads may be built in CRAs for this purpose.

Tree-cutting, Sale, or Removal

The provisions of the proposed Colorado Roadless Rule prohibit the cutting, sale, or removal of trees within CRAs unless one of four circumstances described in table 9 is met. The responsible official must consider the need for the cutting, sale, or removal of trees along with other resource and community protection needs, consistency with applicable forest plans, and effects on roadless characteristics.

Table 9. Alternative 2, circumstances in which tree-cutting, sale, or removal would be allowed in roadless areas

Description
<ul style="list-style-type: none"> • Where needed for management and improvement of wildlife and plant species, including threatened, endangered, proposed, or sensitive species, in coordination with the Colorado Department of Natural Resources and Colorado Division of Wildlife. Such activities should be designed to maintain or improve roadless characteristics as defined by this rule. • Where needed to reduce the hazard of wildfire effects or large-scale insect and disease outbreaks, in areas covered by and as provided in a community wildfire protection plan as defined in section 101(3) of the Healthy Forests Restoration Act of 2003 (Public Law Number 108-148), or, if a community wildfire protection plan is not present, within areas of the wildland-urban interface as defined in section 101(16) of the Healthy Forests Restoration Act of 2003. To the extent practicable, consistent with the purposes of this paragraph, the responsible official shall implement projects to reduce the wildfire hazard to communities in balance with roadless area characteristics as defined by this rule. • Where it is incidental to the implementation of a management activity not otherwise prohibited by this subpart. • Where needed and appropriate for personal or administrative use, as provided for in 36 CFR 223- Sale and Disposal of National Forest System Timber.

Additional Provisions

The Colorado Rule would not revoke, suspend, or modify any permit, contract, or other legal instrument authorized prior to the date of the Rule. Also, the Colorado Rule would not revoke, suspend, or modify any project or activity decision made prior the date of the Rule. The proposed Colorado Roadless Rule contains other provisions related to managing specific land use activities within CRAs, such as those described in Features Common to All Alternatives.

Table 10 describes additional provisions unique to this proposed Colorado Roadless Rule.

Table 10. Alternative 2, additional provisions for managing land uses within Colorado roadless areas

Description
<ul style="list-style-type: none"> • The construction of pipelines to transport oil or gas including activities associated with such construction whether permanent or temporary from a source or sources located outside a CRA through a CRA is prohibited after the effective date of this rule and shall not be excepted, allowed, or otherwise authorized. • Upon request, the Forest Service will offer cooperating agency status to the State of Colorado for all projects proposed to be implemented on lands within CRAs, including those within ski area acres that are specifically excluded from CRAs, where the Forest Service has jurisdiction to approve such activities.

ALTERNATIVE 3: FOREST PLANS

Alternative 3 would promulgate a state-specific rule directing that management of IRAs within Colorado will be based on direction in the forest plans for the eight national forests. This alternative uses the IRAs identified in each forest plan or its associated records of decision, which currently coincides with the 2001 Roadless Rule IRAs. Furthermore, this alternative addresses the purpose and need by providing a level of protection for roadless area characteristics, along with increasing management flexibility, and by being responsive to public interests at state and local levels. Effectively, this alternative would exempt IRAs within Colorado from the 2001 Rule.

Forest plan direction that applies to the management of roadless areas includes forest plan goals (desired conditions), objectives, forest-wide standards and guidelines, management area

standards and guidelines, and descriptions of suitable uses. In each forest plan, roadless areas overlap a number of different land management allocations.

As previously described in Features Common to All Alternatives, forest plans may be updated through an amendment or revision process to reflect changed conditions or specific public or management needs. The NFMA requires forest plans to be revised every 15 years. The revision process includes a review and update of the roadless area inventory of potential wilderness areas for evaluation as recommended wilderness. In addition, project-level amendments to forest plans may be made to make a specific project consistent with the forest plan. Subsequent forest plan amendments and revisions may result in changes to roadless area boundaries or roadless area management direction.

Roadless Areas

Alternative 3 uses the IRAs identified in the forest plans or their records of decision, and are the same as IRAs described under alternative 1. Like the other alternatives, alternative 3 excludes congressionally designated areas from the IRAs analyzed in this EIS. As with alternative 1, the roadless areas under alternative 3 cover 4.25 million acres (table 11).

Under alternative 3, roadless boundaries may be adjusted through a forest plan amendment or revision process, in accordance with the National Forest Management Act and implementing regulations at 36 CFR 219. This process includes meeting requirements under NEPA and requirements for public participation. Any roadless area boundary adjustments made through forest plan amendments or revisions would be approved by the responsible official.

Management of Roadless Areas

The Arapaho and Roosevelt, Rio Grande, Routt, and White River National Forests have completed forest plan revisions. The Grand Mesa, Uncompahgre, and Gunnison, Manti-La Sal, Pike and San Isabel, and San Juan National Forests are undergoing forest plan revision processes. In the past few years, the trend has been to allocate more roadless areas to management prescriptions that conserve roadless area characteristics.

In general, alternative 3 allows for more roading and tree-cutting in roadless areas compared to the other two alternatives. Appendix B contains a summary of current forest plan management direction for roadless areas associated with road construction and reconstruction and tree-cutting activities, and these are also shown on the alternative 3 map in the map packet.

Road Construction and Reconstruction

Alternative 3 follows forest plan direction regarding road construction and reconstruction and applicable Forest Service directives and regulations. The directives discourage construction of new permanent roads and require responsible officials to minimize the miles of permanent roads to those determined to be necessary. Furthermore, the directives encourage use of temporary roads when needed for single-use projects and authorizations. The responsible official may consider temporary road construction only after reviewing other access options, and such roads must be constructed in a manner that minimizes effects on surface resources, prevents unnecessary or unreasonable surface disturbances, and complies with all applicable land and resource management plan direction, regulations and laws. When temporary roads

are no longer needed, or upon termination or expiration of the lease, contract, or permit, whichever is sooner, those roads must be decommissioned and the affected landscape restored to a more natural state. These road construction and decommissioning policies are the same as those previously described for the other alternatives.

In addition to those road system management requirements just described, forest plan direction for road construction and reconstruction generally falls into one of four categories:

- a. **Roading is generally prohibited** except where needed for reserved and outstanding rights or other exemptions mandated by law, regulation, or policy.
- b. **Roading is generally restricted** based on a desired condition or guideline; not a mandatory restriction.
- c. **Roading is generally not restricted** except under some specific circumstances based on the purpose of and need for the road, or road density limitations, or protection of natural resource values.
- d. **Roading is generally allowed** for any multiple-use management need, where consistent with law, regulation, or policy.

Alternative 3 differs from the other two alternatives in that it does not include a general prohibition on road construction or reconstruction in the roadless areas. Roding in these roadless areas is prohibited or limited only where there is specific forest plan direction. The EIS record contains a report that excerpts the management direction from each forest plan relevant to prohibitions or limitations on road construction and reconstruction or tree-cutting, sale, or removal activities on NFS land. Appendix B summarizes that forest management plan direction. The map packet contains a map of alternative 3 with management direction for road construction, reconstruction, and tree-cutting activities.

Tree-cutting, Sale, or Removal

Under alternative 3, there is no general prohibition on tree-cutting, sale, or removal within the IRAs. Therefore, tree-cutting, sale, or removal would be allowed in IRAs anywhere those activities are not specifically prohibited or limited by forest-wide or management area direction in the applicable forest plan.

Like road construction and reconstruction, forest plan direction for tree-cutting, sale or removal generally falls into one of four categories:

- a. **Tree-cutting, sale, or removal is generally prohibited** except where needed for reserved and outstanding rights, or for other exemptions mandated by law, regulation, or policy. Examples of exemptions mandated by law, regulation, or policy include: tree-cutting to maintain roads or trails for safety purposes; removal of hazard trees; fire line construction for wildland fire suppression or control of prescribed fire; tree-cutting allowed under existing authorizations such as for developing ski runs or utility corridors; and others.
- b. **Tree-cutting, sale, or removal is generally restricted** based on desired conditions or guidelines; not based on mandatory direction.
- c. **Tree-cutting, sale, or removal is generally not restricted** except under some specific circumstances based on the purpose and need of the project or for specific resource protection purposes. Examples are where tree-cutting is limited to certain locations or

conditions, such as only for non-timber purposes such as to reduce wildfire hazard or improve wildlife habitat.

- d. Tree-cutting, sale, or removal is generally allowed** as needed to meet multiple-use management purposes.

Although management direction in the forest plans regarding tree-cutting differs by national forest, some direction is common among plans. Common to all forest plans, tree-cutting for such non-timber purposes of hazardous fuel reduction or wildlife habitat improvement may occur on NFS lands that are considered unsuitable for timber production. Also common to all forest plans, tree-cutting for primarily timber production purposes is limited to NFS land identified as suitable for timber production. Further, Forest Service planning regulations allow project-specific amendments to forest plans that would allow tree-cutting in site-specific project areas where forest plans otherwise prohibit tree-cutting. This would occur if there were a compelling need for such project-specific amendment, and such an amendment would not apply to other projects.

The same circumstances in which tree-cutting is allowed under the other two alternatives would apply under alternative 3, in areas where the forest plans do not prohibit or otherwise limit such use, as described in tables 7 and 9.

Additional Provisions

This Forest Plan Alternative involves other provisions related to managing land use activities within IRAs. Most of these are previously described under Features Common to All Alternatives. There are no additional provisions unique to this alternative not already described in this chapter.

COMPARISON OF ALTERNATIVES

This section provides a comparative summary of each alternative (table 11) described in detail in this chapter. It also presents and compares the estimated consequences of each alternative (table 12), summarized from the environmental consequences described in detail in chapter 3. The comparison tables focus on the key differences between the alternatives and their most likely consequences. Because the proposed rulemaking and its alternatives are broad, programmatic, and do not involve any proposed site-specific actions, the consequences are appropriately broad and qualitative rather than quantitative.

Table 11. Comparison of alternatives

Descriptor	Alternative 1 – No Action 2001 Roadless Rule	Alternative 2 – Proposed Action Colorado Roadless Rule	Alternative 3 – Forest Plans
Overview			
Promulgation of a state-specific rule for managing roadless areas	<ul style="list-style-type: none"> A state-specific rule might or might not be promulgated for Colorado. Either way, the management of roadless areas on NFS lands in Colorado would be governed by provisions of the current 2001 Roadless Rule and by any additional limitations imposed by forest plans. 	<ul style="list-style-type: none"> A state-specific rule would be promulgated for Colorado. Management of roadless areas on NFS lands in Colorado would be governed by provisions of the Colorado Roadless Rule and by any additional limitations imposed by forest plans. 	<ul style="list-style-type: none"> A state-specific rule would be promulgated for Colorado. Management of roadless areas on NFS lands in Colorado would be governed exclusively by the applicable management direction in forest plans.
Roadless areas	<ul style="list-style-type: none"> 4.25 million acres of inventoried roadless areas (IRAs) established by the 2001 Roadless Rule, excluding 184,000 acres of wilderness and other congressionally designated acres. IRAs are displayed in the FEIS Volume 2 – Maps of Inventoried Roadless Areas for the 2001 Roadless Conservation Rule. 	<ul style="list-style-type: none"> 4.03 million acres of Colorado roadless areas (CRAs) that stem from the IRAs established by the 2001 Roadless Rule, excluding 184,000 acres of wilderness and other congressionally designated acres, and modified by correcting map errors and updating NFS land boundaries: <ul style="list-style-type: none"> Removing 8,200 acres of allocated ski areas and 520,800 substantially altered areas and mapping errors; Adding 309,000 acres of unroaded lands meeting roadless area criteria; 	<ul style="list-style-type: none"> Same 4.25 million acres of IRAs as in alternative 1, excluding 184,000 acres of wilderness and other congressionally designated acres. The IRAs adopted into 2001 Roadless Rule are the same as those used in each of the forest plans.

Descriptor	Alternative 1 – No Action 2001 Roadless Rule	Alternative 2 – Proposed Action Colorado Roadless Rule	Alternative 3 – Forest Plans
Changes to roadless area boundaries	<ul style="list-style-type: none"> This Rule does not provide a process for changing IRA boundaries. Changes could be allowed in the future if authorized by the Secretary of Agriculture through rule making. 	<ul style="list-style-type: none"> Provides a process for the Chief of the Forest Service to make changes to CRA boundaries. <p>Administrative corrections require public notice, and significant changes require public involvement comparable with rulemaking actions.</p>	<ul style="list-style-type: none"> Changes to IRA boundaries may be made through a forest plan amendment or revision process, subject to public involvement and analysis under NFMA and NEPA regulations (36 CFR 219 and 40 CFR 1500).
Features Common to All Alternatives			
Affected national forests in Colorado	<ul style="list-style-type: none"> Arapaho and Roosevelt Grand Mesa, Uncompahgre, and Gunnison Pike and San Isabel Rio Grande Routt San Juan White River <p>Plus, 2% of the 1.4-million-acre Manti-La Sal National Forest where it occurs in Colorado.</p>		
Congressional designations	<p>Nine congressionally designated areas overlap portions of IRAs, totaling about 184,000 acres. These areas are excluded from the roadless areas analyzed in this EIS. Those areas would not be subject to state-specific rulemaking. Congressional designations have significantly different provisions than the current or proposed rules, and statutory provisions supersede rule (regulatory) provisions.</p>		
Federal and state authorities	<p>Numerous federal and state laws, regulations, executive orders, and Forest Service directives (in manuals and handbooks) would continue to govern management of roadless areas on NFS lands in Colorado.</p>		
Forest plans	<ul style="list-style-type: none"> The analysis of alternatives in this EIS is predicated on forest plan direction at the time of the analysis, recognizing that forest plans are subject to change over time, and that several plans are currently undergoing revision. Rulemaking does not alter forest plans or the ability to update those plans through amendment or revision processes. Activities in roadless areas must adhere to forest plan direction where it is more restrictive than the roadless rule. There are numerous forest plan requirements that would impose additional limitations on activities in roadless areas beyond the roadless rule prohibitions. 		
Programmatic compared to project-specific analysis	<p>Although the alternatives establish specific prohibitions for certain activities within roadless areas, alternatives do not authorize implementation of any ground-disturbing actions in the roadless areas. When such actions are proposed in the future, they must undergo environmental analysis, public involvement, and decision making processes pursuant to the NEPA and its associated regulations at 40 CFR 1500-1508.</p>		

Descriptor	Alternative 1 – No Action 2001 Roadless Rule	Alternative 2 – Proposed Action Colorado Roadless Rule	Alternative 3 – Forest Plans
Reserved and outstanding rights	<p>Alternatives allow roading, tree-cutting and other activities in roadless areas that are associated with rights allowed by existing laws or treaties. This includes allowing road access, surface occupancy, and use of NFS land in roadless areas for purposes of:</p> <ul style="list-style-type: none"> • Accessing private lands within or adjacent to NFS land, as authorized under Alaska National Interest Land Conservation Act (ANILCA). • Accessing NFS lands for exploration and development of valid claims of locatable minerals (e.g., gold, silver, copper, lead, zinc, uranium, and tungsten), as authorized under the 1872 Mining Act. • Accessing NFS lands for American Indian land uses, as authorized under various American Indian treaties. • Accessing NFS lands to conduct a response action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), including a natural resource restoration action under CERCLA, Section 311 of the Clean Water Act, or the Oil Pollution Act. • Accessing NFS lands for a Federal Aid Highway project, as authorized under 23 USC- Highways. 		
Existing authorizations	<p>Alternatives allow roading, tree-cutting, and other activities in roadless areas that are associated with valid written authorizations issued by the Secretary of Agriculture or designated Forest Service official. These include authorizations granted by permits, contracts, or leases.</p> <ul style="list-style-type: none"> • Rulemaking may not affect or bias decisions related to renewal, continuation, or transfer of existing authorizations. • Road building, tree-cutting, motor vehicle uses, and other activities are not prohibited in roadless areas where they have been authorized under an existing land use authorization and where not restricted by forest plan direction. This includes but is not limited to activities authorized for: <ul style="list-style-type: none"> ○ Livestock grazing operations ○ Utility operations ○ Ski area operations ○ Mineral resource extraction operations, pursuant to 36 CFR 228 regulations ○ Other activities under lands or recreation special use permits, contracts, or leases. <p>This feature differs by alternative for specific activities (explained later). For example:</p> <ul style="list-style-type: none"> ○ Alternative 1: roading is allowed in IRAs for existing authorized uses, limited to those issued prior to January 2001 ○ Alternative 2: roading is allowed in CRAs for existing authorized uses and future authorizations for utility and water conveyances except as limited by Forest Plan direction, and coal leases in the North Fork coal mining area ○ Alternative 3: roading is allowed in IRAs for existing authorized uses and any future authorizations where not specifically limited by forest plan direction 		

Descriptor	Alternative 1 – No Action 2001 Roadless Rule	Alternative 2 – Proposed Action Colorado Roadless Rule	Alternative 3 – Forest Plans
Discretionary land uses	<p>Other activities are allowed in roadless areas at the discretion of responsible officials, if such activities are not constrained by one of the roadless rules, forest plan direction, laws, regulations or policies. For example, designation and management of NFS roads and trails, and motor vehicle travel on NFS land, are governed by the decisions made for site-specific projects and forest plans, along with associated motor vehicle use maps developed under the 2005 Travel Management Rule (36 CFR 212).</p> <p>For activities not addressed in the roadless rulemaking, forest plan direction would typically govern such activities in roadless areas, including but not limited to:</p> <ul style="list-style-type: none"> • Management and use of roads and trails (e.g., opening, closing, decommissioning, and maintaining) <ul style="list-style-type: none"> ○ Management and use of motorized vehicles (designations made in Motor Vehicle Use Maps) ○ Recreational activities such as hunting, fishing, camping, hiking, mountain biking ○ Management and use of developed recreation facilities ○ Management of vegetation, habitat, or ecosystems, such as by prescribed burning 		
Public safety or irreparable resource damage	<p>Allows road construction or reconstruction in roadless areas where needed to:</p> <ul style="list-style-type: none"> • Protect public health and safety in cases of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property • Prevent irreparable resource damage caused by a NFS road, which cannot be mitigated by road maintenance • Implement a road safety improvement project on a NFS road determined to be hazardous to public safety 		

Descriptor	Alternative 1 – No Action 2001 Roadless Rule	Alternative 2 – Proposed Action Colorado Roadless Rule	Alternative 3 – Forest Plans
Features that Differ Between Alternatives—Road Construction and Reconstruction			
General road provisions	<ul style="list-style-type: none"> • Generally prohibits road construction or reconstruction in IRAs. Does not distinguish between temporary and permanent roads. • Does not require that an EIS be prepared to analyze proposals for permanent roads in IRAs. That decision would be made by the responsible official in accordance with NEPA requirements. • Does not include specific provisions about decommissioning and closing roads, which are addressed by other regulations and directives. 	<ul style="list-style-type: none"> • Generally prohibits road construction or reconstruction in CRAs, distinguishing between permanent and temporary roads • Requires preparation of an EIS to analyze proposals for permanent roads in CRAs, and evaluation of a temporary road alternative. • Includes specific provisions about decommissioning and closing roads; such provisions are consistent with other regulations and directives. 	<ul style="list-style-type: none"> • Forest plans include some IRAs where roads are generally prohibited. Some forest plan direction distinguishes between temporary and permanent roads, and provides other road-building direction to protect resource values. • Does not require that an EIS be prepared to analyze proposals for permanent roads in IRAs. That decision would be made by the responsible official in accordance with NEPA requirements. • Includes some direction about road decommissioning and closures, to protect resource values in specific areas.
Roads in ski areas	<ul style="list-style-type: none"> • Road construction or reconstruction is limited to within ski area permit boundaries established prior to January 2001 (~3,200 acres). • Ski areas remain inside IRAs. 	<ul style="list-style-type: none"> • No rule-related limitations on road construction or reconstruction in forest plan allocated ski areas (~8,200 acres). Ski areas remain subject to forest plan direction. • Ski areas are excluded from CRAs. 	<p>Same as alternative 2, except:</p> <ul style="list-style-type: none"> • Ski areas remain inside IRAs
Roads in substantially altered lands (~520,800 acres)	<ul style="list-style-type: none"> • Road construction or reconstruction on substantially altered lands in IRAs is prohibited. • These areas are within the IRAs. 	<ul style="list-style-type: none"> • No rule-related limitations on road construction or reconstruction on the substantially altered lands; remain subject to forest plan direction. • These areas are excluded from CRAs. 	<p>Same as alternative 2, except:</p> <ul style="list-style-type: none"> • These areas are within the IRAs.

Descriptor	Alternative 1 – No Action 2001 Roadless Rule	Alternative 2 – Proposed Action Colorado Roadless Rule	Alternative 3 – Forest Plans
Roads for public safety and resource protections	<p>Road construction or reconstruction is allowed in IRAs where needed to:</p> <ul style="list-style-type: none"> • Support actions covered by laws or treaties, including those for purposes of CERCLA, Federal Highway Projects (23 USC), and locatable mineral operations (1872 Mining Act). • Prevent irreparable resource damage. • Address road safety hazards • Protect public safety from imminent threat of flood, fire, and other catastrophic events that may threaten loss of life or property. 	<p>Same as alternative 1, except:</p> <ul style="list-style-type: none"> • These roads are temporary and constructed as needed for public health and safety in cases of threat of flood, fire, and catastrophic events that may threaten loss of life or property. 	<p>Same as alternative 1, per agency regulations and policy directives.</p>
Roads for leaseable minerals operations (e.g., oil and gas)	<ul style="list-style-type: none"> • Road construction or reconstruction in IRAs related to leaseable mineral exploration and development is limited to areas under an existing lease (issued prior to January 2001) where stipulations allow. 	<ul style="list-style-type: none"> • Road construction or reconstruction related to leaseable mineral exploration and development in CRAs is limited to areas under an existing lease (issued prior to effective date of Colorado Rule) where stipulations allow. • Roads are short-term or long-term temporary roads. • Roads are closed to the public 	<ul style="list-style-type: none"> • No rule-related limitation related to leaseable oil or gas mineral exploration and development, for existing or future lease areas. • Leasing stipulations from forest plans as well as oil and gas leasing decisions may constrain surface occupancy and use in IRAs to protect resources, and include reclamation requirements and other resource protection measures. Some forest plans identify IRAs not available for leasing.

Descriptor	Alternative 1 – No Action 2001 Roadless Rule	Alternative 2 – Proposed Action Colorado Roadless Rule	Alternative 3 – Forest Plans
Roads for leaseable coal operations	<ul style="list-style-type: none"> Road construction or reconstruction in IRAs for coal exploration and development are limited to areas under lease prior to January 12, 2001. 	<ul style="list-style-type: none"> Road construction or reconstruction in CRAs is allowed for coal exploration and development, but only within the North Fork coal mining area Road construction or reconstruction in CRAs is allowed for coal-related methane gas removal in the North Fork coal mining area where authorized under a gas lease Roads are short-term or long-term temporary roads. Roads are closed to the public 	<ul style="list-style-type: none"> Same as Alternative 2: no rule-related limitations. Current forest plan direction does not limit road-building in areas where coal resources occur. Forest plans include management direction for areas where coal resources exist to protect sensitive surface resources.
Roads for utility and water facilities	<ul style="list-style-type: none"> Road construction or reconstruction related to utility and water conveyances is limited in IRAs to areas under an existing permit (issued prior to January 2001). 	<ul style="list-style-type: none"> Road construction or reconstruction related to utility and water conveyances is allowed in support of existing as well as future permits other than where forest plan direction prohibits roading. Utilities are defined as existing and future powerlines. Water conveyances are defined as existing and future diversion structures, headgates, pipelines, ditches, canals, and tunnels. 	<ul style="list-style-type: none"> No rule-related prohibitions on road construction or reconstruction in IRAs. Road-building activities in IRAs would be entirely governed by forest plan direction. Forest plan direction includes areas where roading is: prohibited, limited, discouraged, or unrestricted.
Roads for reducing wildfire hazards or large insect-disease outbreaks	<ul style="list-style-type: none"> Road construction or reconstruction for reducing wildfire hazard or insect-disease outbreaks is prohibited. 	<ul style="list-style-type: none"> Road construction or reconstruction is allowed where needed to reduce wildfire hazard or insect-disease outbreaks in areas covered by a community wildfire protection plan or in a wildland urban interface. Temporary (short-term) roads only. 	<ul style="list-style-type: none"> No rule-related prohibitions on road construction or reconstruction in IRAs. Road-building activities in IRAs would be entirely governed by forest plan direction. Forest plan direction includes areas where roading is: prohibited, limited, discouraged, or unrestricted.

Descriptor	Alternative 1 – No Action 2001 Roadless Rule	Alternative 2 – Proposed Action Colorado Roadless Rule	Alternative 3 – Forest Plans
Features that Differ Between Alternatives—Tree-cutting, Sale, or Removal			
General tree-cutting, sale, and removal provisions	<p>Tree-cutting, sale, or removal (also called timber harvest in this Rule), is generally prohibited in roadless areas, with some exceptions.</p> <ul style="list-style-type: none"> In many IRAs, forest plans add more restrictions related to conducting this activity, to protect other resource values. 	<p>Same as alternative 1, although there are more exceptions under this alternative (see below).</p>	<p>No rule-related prohibition on tree-cutting, sale or removal in roadless areas.</p> <ul style="list-style-type: none"> Forest plans include some IRAs where tree-cutting is prohibited, and provides other direction for tree cutting and removal to protect resource values. Forest plans in Colorado generally allow tree-cutting for non-timber purposes on any NFS lands, subject to specific resource management direction. Forest plans also identify lands suitable for timber harvest for timber production purposes.
Tree-cutting, sale, or removal for incidental, personal, administrative uses	<p>This activity is allowed in IRAs:</p> <ul style="list-style-type: none"> Where incidental to other management activities (e.g., road or trail construction or maintenance, minerals operations, and other authorized uses). For personal or administrative uses, as provided for in 36 CFR part 223 (e.g., firewood, Christmas trees). 	<p>Same as alternative 1.</p>	<p>Same as alternatives 1 and 2, per agency regulation and policies.</p>
Tree-cutting, sale, or removal in substantially altered areas	<p>This activity is not rule-limited in substantially altered areas in IRAs.</p>	<p>Same as alternative 1, although these areas are outside CRAs and are governed by the applicable management direction in forest plans.</p>	<p>This activity is not rule-limited in substantially altered areas in IRAs. The areas are governed by the applicable management direction in forest plans.</p>
Tree-cutting, sale, or removal for habitat improvement	<p>This activity is allowed in IRAs to improve habitat for threatened, endangered, proposed, or sensitive species, and to maintain or improve roadless characteristics.</p> <ul style="list-style-type: none"> Limited to generally small-diameter trees. 	<p>Similar to alternative 1, except expands this exception to allow tree-cutting in CRAs to improve habitat for all wildlife and plant species.</p> <ul style="list-style-type: none"> Changes “maintain or improve” to “be in balance with” roadless characteristics. Not limited to generally small diameter trees. 	<p>Similar to alternative 2, forest plans generally allow tree-cutting in IRAs to improve wildlife and plant habitat.</p>

Descriptor	Alternative 1 – No Action 2001 Roadless Rule	Alternative 2 – Proposed Action Colorado Roadless Rule	Alternative 3 – Forest Plans
Tree-cutting, sale, or removal to reduce wildfire hazard and insect-disease outbreaks	<ul style="list-style-type: none"> This activity is allowed in IRAs, to maintain or restore ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects, within the range of variability expected to occur under natural disturbance regimes, in order to maintain or improve roadless characteristics. Limited to generally small-diameter trees, and precludes associated road building. 	<ul style="list-style-type: none"> Similar to alternative 1, except the activity is specific to the need to reduce wildfire hazard and large insect and disease outbreaks, within areas covered by a community wildfire protection plan or in a wildland-urban interface. Not limited to generally small-diameter trees, and does not preclude associated road building. 	<ul style="list-style-type: none"> Forest plans allow tree-cutting in most IRAs for purposes described in alternatives 1 or 2, with exceptions in some specific management areas. Not limited to generally small-diameter trees, and does not preclude associated road building.
Other Requirements for Management of Roadless Areas in Colorado			
Oil and gas pipelines	No prohibition on oil or gas pipelines through IRAs from sources outside IRAs.	Prohibits construction of oil and gas pipelines through CRAs from sources outside the CRAs.	No prohibition on oil or gas pipelines through IRAs from sources outside IRAs
Cooperating agency status	No specific provisions for granting cooperating agency status. The responsible official would continue to make this decision on a case-by-case basis, pursuant to NEPA regulations.	Upon request, the Forest Service will grant cooperating agency status to the State of Colorado for the planning of all activities proposed within CRAs, as well as activities proposed in the ski areas excluded from the CRAs, where the Forest Service has jurisdiction to grant such status.	Same as alternative 1.

Table 12. Comparison of alternatives by environmental consequences (refer to chapter 3 for details)

Purpose and Need, and Issues (see chapter 1)	Alternative 1- No Action 2001 Roadless Rule	Alternative 2- Proposed Action Colorado Roadless Rule	Alternative 3- Forest Plans Alternative
Roadless Area Management			
Flexibility to reduce wildfire hazard	1 percent of the annual fuel treatments on NFS lands in Colorado would occur in roadless areas.	12 percent of the annual fuel treatments on NFS lands in Colorado would occur in roadless areas (in CWPP areas or WUIs).	27 percent of the annual fuel treatments on NFS lands in Colorado would occur in roadless areas.
Flexibility to reduce large insect-disease outbreaks	2 percent of the high risk acres in roadless areas would likely be treated.	19 percent of the high risk acres in roadless areas would likely be treated.	41 percent of the high risk acres in roadless areas would likely be treated.
Flexibility to improve wildlife and plant habitat, including special status species	Not allowing new roads in conjunction with treatments to reduce wildfire hazard would result in a higher risk of severe wildfires causing adverse impacts to habitat for some species.	Allowing new roads in conjunction with treatments to reduce wildfire hazard would result in reducing the risk of severe wildfires causing adverse impacts to habitat for some species. Increased ability to cut trees on more acres for forest health and fuels management could improve habitat for early seral species in some areas in the short-term.	Same flexibility to improve habitat conditions as alternative 2, but to a greater extent.
Flexibility to provide for utility and water facilities and conveyances	Does not allow new roads to provide for future utility or water conveyances in roadless areas (limited to those under an existing permit issued prior to January 2001).	Allows new roads to provide for future electrical transmission utilities and water conveyances in roadless areas (other than where prohibited by forest plan direction).	Same flexibility as alternative 2, with additional flexibility for new roads to provide for other types of utilities such as telephone and fiber optic lines, water reservoirs, and others (other than where prohibited by forest plan direction).
Flexibility for updating and improving accuracy of roadless area boundaries	Does not provide a process for updating roadless area boundaries. Changes could be allowed in the future if authorized by the Secretary of Agriculture through rule making.	Provides a process for updating roadless area boundaries. Administrative corrections require public notice, and significant changes require public involvement comparable with rulemaking actions.	Like alternative 2, provides a process for updating roadless area boundaries. Boundary changes may be made through a forest plan amendment or revision process, subject to public involvement and analysis under NFMA and NEPA regulations (36 CFR 219 and 40 CFR 1500).

Purpose and Need, and Issues (see chapter 1)	Alternative 1- No Action 2001 Roadless Rule	Alternative 2- Proposed Action Colorado Roadless Rule	Alternative 3- Forest Plans Alternative
Flexibility to respond to emergency situations and major threats to public safety	<p>All of the alternatives provide adequate flexibility to respond to emergency situations or major threats to public health and safety in roadless areas (refer to features common to all alternatives). The Forest Service will continue to respond to wildfires, chemical or oil spills, abandoned mine hazards, road-design hazards, hazard trees, and other similar situations. Roads for this purpose must be temporary under alternative 2, and would be expected to be temporary under alternatives 1 and 3.</p> <p>Under alternative 1, the lower number of road miles expected in roadless areas would limit the responsiveness and timeliness to emergency health and safety situations. Under alternative 2, and even more so under alternative 3, the greater number of road miles projected to occur in roadless areas would facilitate more rapid responses to emergency health and safety situations.</p>		
Flexibility to support outstanding rights and existing authorized uses of NFS lands	<p>All of the alternatives allow the exercise of outstanding rights for access, occupancy, and use of NFS lands within roadless areas, including those that exist by law, treaty rights, or other authority (e.g. access to private property, valid mining claims for locatable minerals, land uses protected by American Indian treaty rights).</p> <p>All of the alternatives allow for the continuation, transfer, or renewal of existing land use authorizations in roadless areas that exist at the time the applicable roadless rule becomes effective, including discretionary authorizations such as for livestock grazing and other permitted activities. For clarification, “existing” authorizations under the 2001 Roadless Rule are those issued prior to January 12, 2001, while “existing” authorizations under the proposed Colorado Roadless Rule would be those issued prior to adoption of the final rule.</p> <p>Thus, outstanding rights and existing authorized uses may continue in roadless areas except where limited by applicable laws, regulations, Forest Service directives, or forest plan direction.</p>		
Flexibility to access energy resources	<p>Provides the least opportunity for access to develop oil, natural gas, or coal resources in roadless areas.</p> <p>No prohibition on oil or gas pipelines through IRAs from sources outside IRAs.</p>	<p>Provides slightly more opportunity than alternative 1 for access to develop oil and natural gas (such as on leases issued since 2001), as well as future coal resources in the North Fork coal mining area.</p> <p>Prohibits construction of oil and gas pipelines through CRAs from sources outside the CRAs.</p>	<p>Provides the most opportunity for access to develop future oil, natural gas, and coal resources compared to the other alternatives.</p> <p>No prohibition on oil or gas pipelines through IRAs from sources outside IRAs.</p>
Roadless Area Characteristics and Values			
Protect soil and water quality, including public drinking water sources	<p>No major difference among alternatives related to the risk of adverse water quality and soil impacts. Alternative 1 would have the least risk of adverse effects, and alternative 2 would have a slightly higher risk, followed by alternative 3 with the greatest risk of adverse impacts. However, these differences are insignificant because the actual impacts would be small in magnitude and scattered over a wide geographic area. Most of the potential effects would be of short duration, and effectively mitigated by site-specific watershed conservation practices, best management practices, post-project rehabilitation of disturbed soil, and regulatory permit requirements.</p>		

Purpose and Need, and Issues (see chapter 1)	Alternative 1- No Action 2001 Roadless Rule	Alternative 2- Proposed Action Colorado Roadless Rule	Alternative 3- Forest Plans Alternative
Protect air quality	No major difference among alternatives related to the risk of adverse impacts on air quality. One minor difference is related to potential smoke-related impacts from wildfires, which would be more likely to occur in roadless areas under alternative 1, and least likely to occur under alternative 3. None of the alternatives is likely to result in emissions that would exceed air quality standards; most would be of short duration with site-specific mitigation measures applied as needed.		
Protect diversity of native plants, including special status plants	No major difference among alternatives related to the risk of adverse effects on native threatened, endangered or sensitive plant species, in part due to mitigation measures. There would be very little to no increases in roads, tree-cutting, or energy development activities in the roadless areas that support threatened, endangered, or sensitive plants. The main difference is the higher risk under alternatives 2 and 3 due to more activities allowed and projected to occur in roadless areas with sensitive plants, and due to expected increases in invasive plants that would pose a threat to native plant communities.		
Invasive plants	An increase of about 4 acres per year of invasive plants in IRAs.	An increase of about 38 acres per year of invasive plants in CRAs.	An increase of about 82 acres per year of invasive plants in IRAs.
Protect wildlife diversity and habitat for threatened, endangered, proposed, and sensitive species	Provides terrestrial species and habitat the most protection compared to other alternatives, based on the roadless areas with important wildlife habitat and projected activities that differ among alternatives.	Provides terrestrial species and habitat moderate protection (less than alternative 1 and more than alternative 3), based on the roadless areas with important wildlife habitat and projected activities that differ among alternatives.	Provides terrestrial species and habitat the least amount of protection compared to the other two alternatives, based on roadless areas with important wildlife habitat and projected activities that differ among the alternatives.
Protect aquatic diversity and habitat for threatened, endangered, proposed, and sensitive species	Provides aquatic species and habitat the most protection compared to other alternatives, based on the roadless areas with important aquatic habitat and projected activities that differ among alternatives.	Provides aquatic species and habitat moderate protection (less than alternative 1 and more than alternative 3), based on the roadless areas with important aquatic habitat and projected activities that differ among alternatives.	Provides aquatic species and habitat the least amount of protection compared to the other two alternatives, based on roadless areas with important aquatic habitat and projected activities that differ among the alternatives.

Purpose and Need, and Issues (see chapter 1)	Alternative 1- No Action 2001 Roadless Rule	Alternative 2- Proposed Action Colorado Roadless Rule	Alternative 3- Forest Plans Alternative
Protect primitive and semi-primitive recreation settings and opportunities	Likely to retain the greatest proportion of roadless area acreage in a primitive or semi-primitive setting. The substantially altered areas and developed ski areas in IRAs may continue to appear inconsistent with semi-primitive characteristics expected in roadless areas.	Likely to retain a high proportion of roadless area acreage in a semi-primitive setting; although some CRA acres would shift toward roaded natural in areas where the most roads and energy operations are projected to occur in CRAs. By not including substantially altered areas and developed ski areas in CRAs and adding unroaded areas to CRAs, the CRAs would appear more consistent with semi-primitive characteristics expected in roadless areas.	Likely to retain lower proportions of roadless area acreage in a semi-primitive setting; more acres would shift toward roaded natural in areas where the most roads and energy operations are projected to occur in IRAs. The substantially altered areas and developed ski areas in IRAs may continue to appear inconsistent with semi-primitive characteristics expected in roadless areas.
Protect scenic quality	Maintains the most IRA acreage at high to very high scenic integrity levels where it exists.	Maintains slightly fewer CRA acres at high to very high scenic integrity levels where it exists, as the scenic integrity of some areas would be reduced by the roads and road-related activities projected as likely to occur in CRAs.	Maintains the least IRA acreage at high to very high scenic integrity levels, as more IRA acres would be reduced by shifting to a moderate to low scenic integrity from the roads and road-related activities projected as likely to occur in IRAs
Protect traditional cultural properties and sacred sites	No major difference among alternatives related to the risk of adverse effects on traditional cultural properties, sacred sites or other cultural (heritage) resources. Alternative 1 offers the most protection from development in roadless areas, which translates to fewer potential effects to historic properties; this is offset somewhat by a slightly increased potential for uncharacteristic wildfire. Alternative 2 offers fewer acres of roadless protection, so there is an increase in potential development activities that may have an effect on cultural resources; wildfire risk is slightly reduced in this alternative. Alternative 3 has the most potential for direct effects on cultural resources; this alternative may also have the lowest risk of uncharacteristic wildfire.		
Protect congressionally designated areas including wilderness and recommended wilderness	No major difference among the alternatives related to the risk of adverse effects on congressionally designated areas. There would be no potential direct effect on these areas as they are located outside the roadless areas that are the subject of each alternative. There could be indirect effects on wilderness characteristics due to some noise and visibility of human activities in adjacent roadless areas, with the highest potential for indirect impacts under alternative 3, and the lowest potential under alternative 1. Effects on areas allocated in forest plans as recommended wilderness would not differ by alternative as forest plans generally prohibit roading and tree-cutting and removal activities in those areas. However, the restrictions on activities in IRAs under alternative 1 provide a greater opportunity to maintain future options for recommending roadless acres as wilderness in the future, compared to alternatives 2 or 3.		

Purpose and Need, and Issues (see chapter 1)	Alternative 1- No Action 2001 Roadless Rule	Alternative 2- Proposed Action Colorado Roadless Rule	Alternative 3- Forest Plans Alternative
Economic Impacts and Distribution Effects			
Leaseable minerals: oil and gas	Projections are for approximately 252 oil and gas wells in roadless areas over a 15-year period; providing the least opportunity for oil and natural gas development and production among the alternatives.	Projections are for approximately 674 oil and gas wells in roadless areas over a 15-year period; providing much more opportunity for oil and natural gas development and production than alternative 1 and slightly less than alternative 3.	Projections are for approximately 731 oil and gas wells in roadless areas over a 15-year period; providing the most opportunity for oil and gas development and production than other alternatives.
Leaseable minerals: coal	Projections are for 6.5 miles of new roads for coal-related activity in roadless areas. Restricts access to potential coal resources in roadless areas more than other alternatives.	Projections are for 45 miles of new roads for coal-related activity in roadless areas. Reduces restrictions on access to potential coal resources in roadless areas compared to alternative 1, but is more restrictive than alternative 3 (limits new roads to the North Fork coal mining area).	Projections are for 66 miles of new roads for coal-related activity in roadless areas. Least restrictive on access to potential coal resources in roadless areas compared to the other two alternatives.
Geothermal	Opportunities for geothermal development in roadless areas would not occur due to new road prohibitions.	Opportunities for geothermal development in roadless areas would not occur due to new road prohibitions.	Opportunities for geothermal development in roadless areas would occur, because most forest plans allow new roads in roadless areas for this purpose.
Locatable and saleable minerals	Opportunities to develop locatable minerals resources held by valid mining claims in roadless areas would continue to occur and would not differ by alternative. Opportunities for saleable minerals production would not likely differ by alternative because little to no saleable mineral operations would likely occur in the roadless areas.		
Values at risk and community protection	Opportunities to protect at-risk communities from wildfire hazards would be lowest under this alternative compared to the others.	Opportunities to protect at-risk communities from wildfire hazards would be available but somewhat limited under this alternative compared to the others.	Opportunities to protect at-risk communities from wildfire hazards would be greatest under this alternative compared to the others.
Environmental Justice	It is unlikely that any of the alternatives would have a disproportionately negative impact on minority or low-income groups in the roadless area counties identified. Local communities of concern would be notified of changes in roadless area management. Changes in demographic trends and responses of minority or low-income groups to roadless area management would depend on location, substitute sites, timing, and various factors and events outside Forest Service control.		
Other General Resource Effects			
Geological and Paleontological	None of the projected activities in roadless areas that vary by alternative would be likely to adversely affect geological or paleontological resources, which would either be avoided or otherwise protected from potential adverse impacts.		

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Purpose and Need, and Issues (see chapter 1)	Alternative 1- No Action 2001 Roadless Rule	Alternative 2- Proposed Action Colorado Roadless Rule	Alternative 3- Forest Plans Alternative
Livestock Management	None of the projected activities in roadless areas that vary by alternative would be likely to have any substantial beneficial or adverse impacts on livestock management operations in roadless area grazing allotments.		