

on either side of the PA would likely not be deterred by developments within the Category III area. Because of the larger area affected, animal movement could be more restricted under the Master Development Plan Alternative.

### 3.5 ROADLESS RESOURCE

During public scoping, some members of the public expressed concern about how development of the Category III area would affect the former Two Elk Roadless Area. The term "roadless area" is one which has frequently been the cause of confusion in public land management and would appear to be so in this case as well. The term has its origins in a 1970s Forest Service inventory and review of undeveloped, unroaded areas across the United States. In a Final Environmental Statement (FES) in 1979, all 2,919 of the individual areas identified were allocated to one of three classes for future study or management: wilderness, multiple uses other than wilderness, or needing further study. The Two Elk Roadless Area, which included the present-day Category III area and the existing Back Bowls, was one of the areas allocated to management for uses other than wilderness in the FES.

The 1979 FES did not actually designate areas as wilderness. In Colorado, the areas identified for wilderness in the FES actually became designated wilderness via the Colorado Wilderness Bill of 1980 (P.L. 96-560). It was through this act that the Holy Cross Wilderness was designated. In the Colorado Wilderness Bill, Congress noted that the Forest Service would not be required to review the wilderness potential of the lands allocated to multiple use in the 1979 FES until revision of individual Forest Plans was undertaken. In 1984, the initial Forest Plan for the White River National Forest was completed. In it, the former Two Elk Roadless Area was allocated to a variety of land-use emphases, including timber management, non-motorized recreation, motorized recreation, and downhill skiing.

Since passage of the Colorado Wilderness Act, a series of legal challenges have focused on the issue of how roadless and undeveloped areas must be addressed in NEPA analyses and documents. In some of these cases the courts have held that when agencies consider approving or building projects in undeveloped and roadless areas, the action may be viewed as a major federal action and require preparation of an EIS, versus simply an Environmental Assessment. In response to this, Forest Service policy has been refined to require that the impacts on the roadless resource be evaluated in project-level NEPA documents such as the Category III EIS. Other than this policy for conducting environmental analysis, roadless and undeveloped areas have no formal status or protection. Instead, the Forest Plan provides the direction for management of these areas. In the case of the Category III area, the Forest Plan management emphasis is for providing downhill skiing opportunities. Consistent with the policy which has evolved, the Category III EIS includes an analysis of the impact of the Proposed Action and alternatives on the roadless resource. This analysis is summarized below.

One of the values often associated with undeveloped areas is its ability to offer opportunities for non-motorized, backcountry recreation opportunities. No public motorized use of the Category III area is anticipated under any of the alternatives. It would remain open to all of the same recreational activities as are currently pursued there, such as hiking, mountain biking, and horseback riding. However, the setting in which these activities occur would be a more developed one, containing ski lifts, roads, skiways, bridges, and food service facilities. To many, this would no longer represent a backcountry recreation opportunity. Those portions of the Category III area which could continue to offer a backcountry recreation experience under the alternatives is provided in Table 8 below.

No Action	Center Ridge	Proposed Action	Master Development Plan
3,460	2,460	1,260	<500

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