CHAPTER 1: PURPOSE OF AND NEED FOR ACTION

This document is an environmental assessment (EA) for the U.S. Department of the Interior (DOI) National Park Service (NPS)—the lead agency—and the U.S. Department of Agriculture (USDA) – Forest Service (FS)—a cooperating agency. It assesses potential environmental, social, and economic impacts on the natural and human-made environments that would result from implementing the proposed action or no action alternative.

This chapter presents the background on and information about the proposed action; the purpose and need of the proposed action; relationships of this EA to other environmental and planning documents; the scope of the environmental analyses; and the decision to be made by the NPS and FS.

1.1 BACKGROUND

The proposed action and compliance with applicable laws and regulations are summarized below. The proposed action is described in more detail in Section 2.0.

1.1.1 Summary of the Proposed Action

The proposed action is to issue permits allowing (1) replacement of an existing radio tower (currently supporting a NPS radio repeater) with a telecommunications tower, and (2) installation of a pre-fabricated equipment shed adjacent to an existing equipment shed in the Theodore Roosevelt National Park (TRNP), in the Little Missouri Badlands, west-central North Dakota (NPS 2004). The existing radio tower currently supports NPS communications equipment; the proposed tower replacement would support both NPS communications equipment and Badlands Cellular of North Dakota LP doing business as (dba) Verizon Wireless (Verizon Wireless) cellular telephone equipment. The proposed action also includes reconstruction and future maintenance of approximately 1.6 miles of National Forest System Road (NFSR) #730A-2 on National Forest System (NFS) land in Sections 17 and 18, T140N, R102W, Billings County, North Dakota (see Figure 1). Verizon Wireless and its contractors would be responsible for management and cost of all proposed construction work and long-term maintenance of the road and proposed facility. This analysis will help the NPS, TRNP, and the FS, Dakota Prairie Grasslands (DPG), Medora Ranger District decide whether to prepare an environmental impact statement (EIS) and whether to issue to Verizon Wireless a right-of-way permit (responsibility of NPS) and a Private Road Special Use Permit (responsibility of FS).

1.1.2 Summary of Compliance with Applicable Laws and Regulations

Because a private company would undertake the proposed action on federal land and would require two permits from the agencies that manage the federal land, Verizon Wireless must comply with the requirements set forth under the National Environmental Policy Act (NEPA) of 1969, in accordance with the regulations of the Council on Environmental Quality (CEQ) for implementation of NEPA (Title 40 Code of Federal Regulations [CFR] parts 1500 through 1508). Verizon Wireless also must comply with applicable NPS and FS regulations and guidelines for implementing NEPA, including the DOI Departmental Manual (DM) Part 516; NPS Director's Order 12 (DO-12) and the DO-12 Handbook; USDA NEPA regulations (7 CFR 1b); 36 CFR 215 (which deals with the FS comment and appeals process); the *Forest Service Manual* (Section 1950); the *Forest Service Handbook* (FSH) (Section 1909.15, Chapters 10, 40, and 60); and the *Environmental Policy and Procedures Handbook* for forest planning, ecosystem management, and planning for multiple uses of FS lands.

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1.1 BACKGROUND

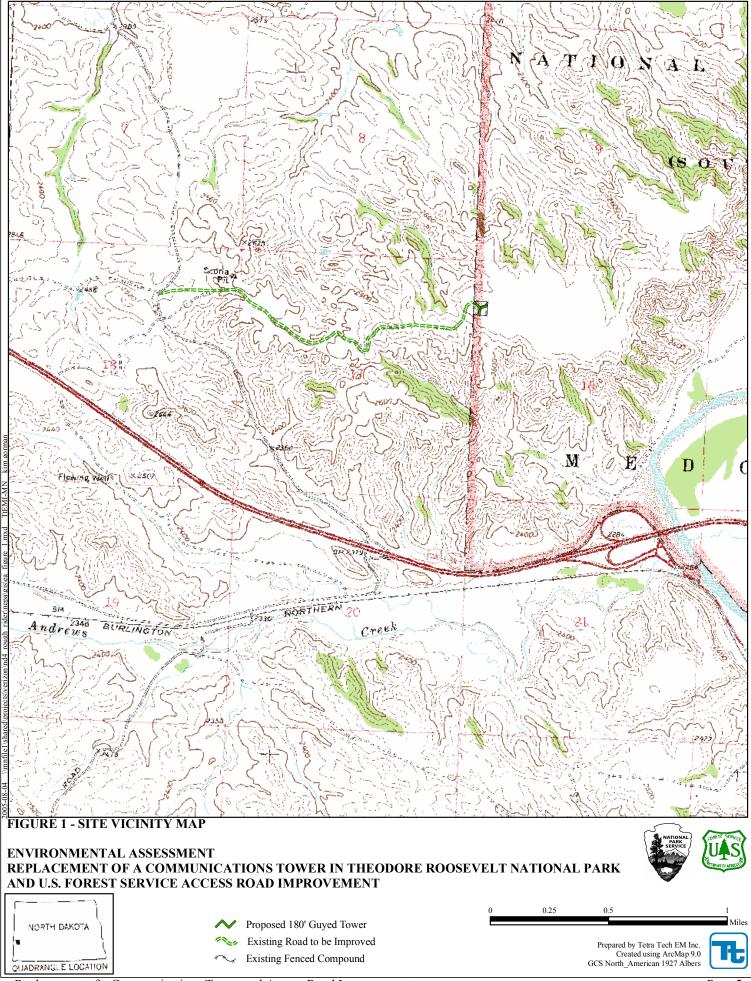
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1.2 PURPOSE AND NEED

The purpose of the proposed action—issuance of right-of-way and Private Road Special Use Permits by the NPS and FS, respectively—is to ensure installation of the proposed telecommunications system in a manner that will not conflict with the goals and purposes of the TRNP and DPG, which are discussed in the management plans of those units (see Section 1.3). The goals and purposes of the TRNP are to protect and conserve the natural, scenic, and historic resources of the region from unnecessary disturbances. The goals and objectives of the DPG provide direction regarding the type and amount of goods and services that are to be produced on the DPG and focus on achieving ecosystem health and ecological integrity The need for the proposed action is to address the application by Verizon Wireless for a right-of-way permit, as required by NPS DO-53 and other pertinent legislation and regulations, such as the Telecommunications Act (http://www.fcc.gov/telecom.html) and applicable Federal Communication Commission (FCC) regulations (http://wireless.fcc.gov/siting/environmental-assessment.html) and FS regulations.

The proposed action would satisfy the growing demand for commercial and personal communication in the region by providing high capability, digital voice and data transmission via cellular telephones. Verizon Wireless applied for the special use permits to replace the existing NPS radio tower with a new tower capable of supporting new telecommunications equipment and NPS radio equipment. This new tower would provide additional cellular coverage and commercial use of the Verizon Wireless telecommunication system in the area and continued use of the radio repeater by the NPS (see Section 2.1.2). Moreover, NFSR #730A-2 would be reconstructed to provide safer access to the existing NPS facility and proposed location of the new telecommunication equipment for construction, operation, and maintenance.

1.3 RELATIONSHIP TO OTHER ENVIRONMENTAL AND PLANNING DOCUMENTS

The NPS and FS apply several environmental and planning documents to encourage management decisions that would maintain sound environmental and natural resource practices on federal lands. The proposed action and no action alternative are both consistent with the management direction set forth in the environmental and planning documents. This EA was prepared in accordance with the following existing environmental and planning documents and hereby incorporates them by reference:

NPS TRNP General Management Plan

TRNP is dedicated to the preservation and public enjoyment of important historic, prehistoric, cultural, scenic, and natural resources (NPS 1987). TRNP is managed to protect and interpret the badlands ecosystem surrounding the Little Missouri River and the cultural resources resulting from human habitation of the area. The park was established as a memorial to honor Theodore Roosevelt, who significantly contributed to the conservation movement and development of the western U.S. Specifically, TRNP was established to:

- Memorialize and preserve the life, times, and philosophy of Theodore Roosevelt in the North Dakota Badlands
- Conserve unimpaired the scenery and the natural and cultural resources, and facilitate scientific interests in TRNP
- Provide for the benefit, use, and enjoyment of the people

• Manage the Theodore Roosevelt wilderness as part of the National Wilderness Preservation System.

The NPS TRNP General Management Plan provides the necessary strategies to guide management, use, and development of TRNP. The plan addresses resource management in the park, with particular attention to flood protection, bison management, historic building preservation, and visitor use needs. Several strategies presented in the plan include expanding trails, upgrading sanitation facilities, developing facilities for horse users and the handicapped, and increasing visitor contact and interpretive opportunities (NPS 1987).

NPS TRNP Resource Management Plan

The TRNP Resource Management Plan describes the natural and cultural resources within TRNP, as well as management activities for safeguarding those resources. A wide variety of research initiatives, baseline surveys, and manipulative and protective techniques are integrated into a comprehensive resource management program that this plan describes. The Resource Management Plan describes the park's strategic long-range management goals for its resources. This vision provides the context for setting priorities and implementing both ongoing programs and short-term projects. The Resource Management Plan can also be used to measure and track progress toward long-term goals and adjust resource management actions to keep pace with developing technologies and techniques (NPS 1994).

FS Dakota Prairie Grasslands Land and Resource Management Plan

The Dakota Prairie Grasslands Land and Resource Management Plan (LRMP) is designed to improve the capability of the Nation's forests and grasslands to provide a desired level of uses, values, products, and services. It also presents the goals, objectives, management standards, and guidelines for the area (FS 2001a). The DPG LRMP provides guidance for all resource management activities on the DPG. It identifies management standards and guidelines; and describes resource management practices, levels of resource use and protection, and availability and suitability of lands for resource management. The DPG LRMP embodies the provisions of the National Forest Management Act (NFMA), the implementing regulations, and other guiding documents. The land-use determinations, management area prescriptions, and standards and guidelines are statements of the management direction for the DPG.

The LRMP describes different management areas (MA), and the proposed project is located within MA 3.65, *Rangelands with Diverse Natural-Appearing Landscapes*. This MA emphasizes maintaining or restoring a diversity of desired plants and animals and ecological processes and functions. It also provides a mix of other rangeland values and uses with limits on facilities to maintain a natural appearing landscape. These areas have relatively few livestock grazing developments, such as fences and water tanks, resulting in a mosaic of livestock grazing patterns and diverse vegetation composition and structure. Livestock graze most areas annually, but some areas receive little or no grazing due to topography. Riparian areas and streams will move toward properly functioning condition and have few human-caused alterations. Restored riparian areas and streams will be evident. Prescribed fire is used as a management tool, although fires (including wildfires) are aggressively controlled. Natural outbreaks of native insects and diseases are allowed to proceed without intervention unless they substantially threaten high-value resources. Natural appearing landscapes predominate; however, oil and gas development may occur and are visually subordinate to the landscape (FS 2001a).

FS Final Environmental Impact Statement for the Northern Great Plains Management Plans Revision

The FS *Final Environmental Impact Statement for the Northern Great Plains Management Plans Revision* provides environmental impact analyses for management plan revisions for three participating administrative units, including the Dakota Prairie Grasslands (FS 2001b).

1.4 SCOPE OF THIS ENVIRONMENTAL ANALYSIS

The project area analyzed in this EA is the tract of land currently supporting the existing TRNP radio tower facility and NFSR #730A-2. The scope of the analysis set forth in this EA is limited to the proposed additions to the existing TRNP radio tower facility and the proposed reconstruction and future maintenance of NFSR #730A-2. Where applicable and possible, and to facilitate as complete an impact analysis as possible, information about areas outside the boundaries of federally managed land has been included. This EA will remain valid until the NPS and FS determine that a new action, new unforeseen significant issues, or new alternatives with different environmental consequences must be analyzed. At that time, this analysis and document would be revised pursuant to NEPA.

1.4.1 Scoping Process

Scoping is an early and open process to determine the breadth of environmental issues and alternatives to be addressed in an EA. The NPS conducted internal scoping and completed an Environmental Screening Form on December 3, 2004. The NPS did not require public (external to the agency) scoping for the proposed project under that agency's regulations. However, the FS did require public scoping for this project, which was conducted by the FS only on the proposed upgrade of existing NFSR #730A-2 by Verizon Wireless. The FS conducted internal scoping in September 2004 and began public scoping on September 30, 2004. On this date, the FS sent a public scoping letter to 56 interested individuals and organizations. The letter included a description of the proposed action and contact information to submit comments. The public scoping period for this project ended on October 30, 2004. Three comment letters were received. Comments received were analyzed by coding each statement by subject, comment type, and disposition. This analysis was conducted using Microsoft Access database software. Additional information regarding the scoping process is presented in Appendix A.

1.4.2 Key Issues and Impact Topics

Issues are questions or statements about the relationship between the proposed action and the natural or cultural environment. Examining issues requires describing the relationship between a proposed action and the environment (NPS 2004). Issues do not specify the context, potential impacts, or intensity of potential impacts; issues simply state that a relationship exists between the proposed action and specific environmental, cultural, and social resources, and are used to determine impact topics examined in the EA. Table 1 presents the issues identified during the scoping process and the impact topics related to each issue and examined in the EA.

Key issues are used to formulate alternatives, prescribe mitigation measures, or analyze environmental consequences. These issues are key because of the extent of their geographic distribution, the potential duration of their effects, or the potential intensity of interest or resource conflict (FS 2004). Based on review and analysis of the public and internal scoping comments received, no key issues are associated with the proposed action. Therefore, the issues identified above and their relationships to specific resource topics serve as the basis for the analyses presented in the EA.

Issue	Impact Topics Related to Each Issue	
	Ecological Setting	
	Watershed Setting	
	Soil Resources	
Potential impacts on the long-term integrity of natural systems and processes	Water Resources	
	Air Quality and Noise	
	Vegetation	
	Wildlife and Fisheries	
	Threatened, Endangered, and Sensitive	
	Species	
Potential impacts on traditional land uses	Ecological Setting	
	Watershed Setting	
	Soil Resources	
Potential impacts resulting from erosion and soil compaction	Water Resources	
	Transportation and Roads	
Potential impacts on water bodies, floodplains, and riparian	Water Resources	
habitat	Wildlife and Fisheries	
Potential impacts on air quality and natural soundscapes	Air Quality and Noise	
Preservation and protection of threatened, endangered, and	Threatened, Endangered, and Sensitive	
sensitive species	Species	
Potential impacts on the long-term integrity of cultural, historic,	Haritage and cultural resources	
and archeological resources	Heritage and cultural resources	
Potential impacts on wilderness	Wilderness	
Potential impacts on viewsheds	Scenery Resources	
Detential immedia on traditional respectional activities	Recreation	
Potential impacts on traditional recreational activities	Transportation and Roads	

TABLE 1-1ISSUES AND IMPACT TOPICS RELATED TO EACH ISSUE

1.4.3 Other Issues Not Considered in Detail with Rationale

Other issues not considered in detail have been identified by the agencies or the public but not used in the environmental analysis for various reasons (FS 2004). Appendix A presents the issues not considered in detail and the rationale for not including them as impact topics.

1.4.4 Issues Involving Resources Not Applicable to Proposed Action or No Action Alternative

Several issues involving resources that would possibly require analysis according to statute and regulation were found not applicable to the proposed action or no action alternative. These resources are prime and unique farmlands; hazardous materials and waste; and socioeconomic and environmental justice resources. The rationale for not considering these resources in this document is as follows.

Prime and Unique Farmlands

In August 1980, the CEQ directed that federal agencies must assess the effects of their actions on farmland soils classified by the USDA Natural Resources Conservation Service (NRCS) as prime or unique. Prime or unique farmland is defined as soil that particularly produces general crops such as common foods, forage, fiber, and oil seed; unique farmland produces specialty crops such as fruits,

vegetables, and nuts. According to NRCS, none of the soils in the project area is classified as prime and unique farmlands. Therefore, the topic of prime and unique farmlands was dismissed as an impact topic in this document.

Hazardous Materials and Waste

A Phase I Environmental Site Assessment (ESA) was conducted in accordance with the *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*, American Society for Testing and Materials designation E 1527-00 (Tetra Tech EM Inc. [Tetra Tech] 2004). No recognized environmental conditions (REC) were identified from review of historical records, review of environmental databases, site reconnaissance, or interviews. Based on the results of the Phase I ESA, hazardous materials and waste were dismissed as impact topics in this document.

Socioeconomic and Environmental Justice Resources

The proposed action would neither change local and regional land use nor impact local businesses or other agencies. The project area is not located near any residences, businesses, or significant socioeconomic resources. Therefore, the socioeconomic environment will not be addressed as an impact topic in this document.

Executive Order 12898, "General Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing disproportionately high and adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities. The proposed action would not have health or environmental effects on minorities or low-income populations or communities as defined in the U.S. Environmental Protection Agency's (EPA) Environmental Justice Guidance (1998) (FS 2005c). Therefore, environmental justice was dismissed as an impact topic in this document.

1.5 DECISION TO BE MADE

This EA supports the NPS and FS decision-making processes related to the proposed action. Specifically, the NPS must decide whether to issue a right-of-way permit and the FS must decide whether to issue a Private Road Special Use Permit to Verizon Wireless. If the permits are issued, Verizon Wireless would implement the proposed action and would replace an existing radio tower with a telecommunications tower, install a pre-fabricated equipment shed adjacent to an existing equipment shed, reconstruct NFSR #730A-2, and provide for operation and maintenance activities. If the NPS decides not to issue a right-of-way permit, the proposed wireless telecommunication facility upgrades and construction would not be completed and Verizon Wireless would have no need to upgrade NFSR #730A-2. If the FS decides not to issue a Private Road Special Use Permit, Verizon Wireless would not be able to implement the proposed construction activities at the telecommunications facility location, as access by construction vehicles would not be possible. In addition to the considerations related to the requirements of NEPA and applicable regulations, the NPS and FS must consider the natural resource management goals outlined in the documents presented in Section 1.3.

The NPS and FS also must decide if the proposed action warrants preparation of an EIS because of the potential for the proposed action to have significant environmental, social, or economic impacts on any resources examined in this EA. The findings of the EA will be documented in either a Finding of No Significant Impact (FONSI) or a Notice of Intent (NOI) to prepare an EIS.

CHAPTER 2: THE PROPOSED ACTION AND ALTERNATIVES

This chapter presents the alternatives considered and analyzed in detail, and alternatives considered but rejected for detailed analysis in the EA.

2.1 ALTERNATIVES CONSIDERED

Two alternatives are considered and analyzed in this EA—the no action alternative and the proposed action. Both alternatives are described below.

2.1.1 The No Action Alternative

The no action alternative includes not issuing one or both of the NPS and FS permits. Under this alternative, the NPS would not issue to Verizon Wireless a right-of-way permit to replace the existing radio tower and install a pre-fabricated equipment shed on NPS lands. Also, the FS would not issue to Verizon Wireless a Private Road Special Use Permit for reconstruction and future maintenance of NFSR #730A-2, located on NFS land in Sections 17 and 18, T140N, R102W, Billings County, North Dakota. If the NPS decides not to issue a right-of-way permit, the proposed wireless telecommunication facility upgrades and construction would not be completed and Verizon Wireless would have no need to upgrade NFSR #730A-2. If the FS decides not to issue a Private Road Special Use Permit, Verizon Wireless would not be able to implement the proposed construction activities at the telecommunications facility location, as access by construction vehicles would not be possible. Therefore, the proposed tower construction and reconstruction and maintenance activities would not occur on federal lands.

Under the no action alternative, the NPS would continue to use and maintain the existing site and tower to support the agency radio repeater and other agency equipment. Public access to the site would continue to be maintained by Billings County and the FS; Billings County would maintain the road up to the existing scoria pit, and the FS would maintain the road up to the existing tower site. The NPS and FS would continue to undertake current maintenance activities for the existing site and road, respectively, in accordance with current management plans. Lastly, Verizon Wireless would more than likely seek a new location on state-owned or privately owned land for the proposed tower and facilities. Alternate tower locations have not been examined or proposed by Verizon Wireless at this time because Verizon Wireless has initially recognized and is attempting to minimize potential impacts on the region that could result from multiple tower and facility locations in close proximity to one another.

2.1.2 The Proposed Action

The proposed action is issuance of a right-of-way permit by the NPS to Verizon Wireless to replace an existing radio tower with a telecommunications tower, and to install a pre-fabricated equipment shed adjacent to an existing equipment shed in the TRNP. The replacement tower would be the same height (180 feet) and design as the existing guyed tower; would use the same type of guy wiring and anchor system as the existing tower; and would provide a location and support for collocated Verizon Wireless cellular antennas, equipment, and NPS radio antennas. Verizon Wireless requested preliminary bids from tower manufacturers that would minimize the potential visual impacts of the replacement tower and still pass structural tests for the specified equipment, given weather conditions of the region (see Appendix B). Based on the preliminary bids, the replacement tower would have a 24-inch face (measured center to center); would be a lattice structure with a solid steel frame; and would use steel diameters varying from 1.25 inches to 1.75 inches at the bottom of the tower, and 1.25 inches at the top of the tower. No lighting would be installed on the proposed tower because it would not meet the minimum specifications requiring lighting under Federal Aviation Administration (FAA) regulations (14 CFR Part 77.13). The pre-fabricated equipment shed would encompass an area 12 feet by 30 feet. All construction and equipment

storage would be contained within the existing NPS-fenced radio tower compound (NPS 2004). Verizon Wireless would also undertake operation and maintenance activities after construction.

The proposed action also includes issuance of a Private Road Special Use Permit by the FS to Verizon Wireless to reconstruct and maintain approximately 1.6 miles of NFSR #730A-2. For most of the road, the two-track character of the existing road would be preserved with limited reconstruction, were necessary, to meet safety standards. The reconstruction of the road is designed to minimize visual impacts of the road on the adjacent NPS lands. The first mile of the road would have five specific areas that would be spot graveled and bladed because travel is difficult during periods when moisture is present. One turnout would also be constructed at the 1.2 mile point for safety reasons. Other then these actions, no other activity would occur in the first mile. The remaining 0.6 mile of the road would be bladed and graveled where needed. The steep grade located just below the electronic site would be reconstructed with a 12-foot running surface, ditching, one culvert placement, a turnout, and surfacing. Specifications of the road reconstruction are presented in Appendix B.

The proposed replacement tower would complement existing Verizon Wireless antennas on the nearby Fondue Terrace near Medora, ND, by providing increased cellular phone coverage in the region. The existing antennas on the Fondue Terrace provide cellular telephone coverage to the downtown Medora area, but provide very weak or no coverage to the interstate or several roads leading into Medora from the west and north. The proposed replacement tower would support antennas that would address areas of weaker coverage, would support continuous coverage along Interstate 94 and the roads leading to Medora, and would expand coverage in the region.

2.1.3 Comparison of Alternatives

The no action alternative provides a baseline against which to compare the proposed action. Table 2-1 compares the alternatives and presents a summary of the environmental consequences of each; the environmental consequences of these alternatives are further discussed in Chapter 4.

2.2 ALTERNATIVES CONSIDERED BUT REJECTED FROM FURTHER ANALYSIS

Verizon Wireless considered one other alternative to the proposed and no action alternative, which was to locate the telecommunication equipment (tower and pre-fabricated equipment shed) on a site other than the one proposed and considered in the EA. A specific alternative site was not identified because it was determined during the planning stage of the project that building a new tower on other public or privately owned land would generally have significant negative impacts on the scenery and viewsheds of the region, by increasing the number of towers in the region by one. Verizon Wireless determined that replacement of an existing tower, rather than building a new one in a different location, would minimize impacts on the region by maintaining the cumulative number of towers in the region while simultaneously meeting the needs to expand telecommunications service. Verizon Wireless then decided to submit an application for the necessary permits from the NPS and FS to implement the proposed action analyzed in this document and did not consider any specific, alternate locations. Therefore, any potential alternatives that would consider alternate locations are not ripe for analysis at this time.

After receipt of the application by Verizon Wireless, the NPS and FS considered including a locked gate for NFSR #730A-2 on FS lands, under the proposed action. However, the proposed action was modified and the gate was eliminated from consideration for several reasons, including: (1) gates are ineffective because topography doesn't generally offer effective gating points; (2) the FS does not want to create a precedent for installing gates on roads; (3) placing a gate on a road can sometimes draw more attention to the area (for example, during hunting season); (4) current traffic use of the road is very limited; and (5) a private citizen requires access to exercise grazing permits.

Resource	Alternative 1: No Action	Alternative 2: Proposed Action	
Physical Resources			
Ecological Setting	Negligible long-term impacts	Negligible long-term impacts	
Watershed Setting	Negligible long-term impacts	Negligible long-term impacts	
Soil Resources	Negligible, site-specific, long- term impacts	Minor, site-specific, and short- and long-term impacts from soil disturbance and erosion	
Water Resources	Negligible long-term impacts	Minor, short- and long-term impacts from erosion, causing sedimentation	
Air Quality and Noise	Negligible long-term impacts	Minor and moderate, short-term impacts from exhaust, dust dispersion, and construction noise, as well as negligible long-term impacts	
Biological Resources			
Vegetation	Negligible long-term impacts	Minor, site-specific, short- and long-term impacts from localized vegetation removal and possible spread of noxious and invasive weeds	
Wildlife and Fisheries	Negligible long-term impacts	Minor, site-specific and local, short- and long- term impacts from habitat loss and temporary displacement during construction	
Threatened, Endangered, and Sensitive Species	Negligible long-term impacts	No effect on endangered species; not likely to adversely affect one threatened species (bald eagle), if construction activities would be completed during the fall and winter seasons; may affect sensitive animal and plant species because of the presence of suitable habitat (Baird's sparrow, Sprague's pipit, loggerhead shrike, Dakota skipper, tawny crescent butterfly, ottoe skipper, Torrey's cryptantha, nodding wild buckwheat, Dakota buckwheat, sand lily, scoria lily or dwarf mentzelia, alyssum-leaved phlox, alkali sacaton, and Hooker's townsendia); no effect on raptor species of concern or watch plant species.	
Heritage and Cultural Resources			
Heritage and Cultural Resources	Negligible long-term impacts	Negligible long-term impacts	
Social Resources			
Wilderness	Negligible long-term impacts	Negligible long-term impacts	

TABLE 2-1 COMPARISON OF ALTERNATIVES AND ENVIRONMENTAL CONSEQUENCES

Resource	Alternative 1: No Action	Alternative 2: Proposed Action
Scenery Resources	Should the NPS or the FS decide not to issue the respective permits to Verizon Wireless, the company would more than likely seek alternate locations on non-federal land for the proposed telecommunications tower. If so, minor, local and regional, long-term impacts, could potentially occur.	Minor, site-specific and local, long-term impacts from a change in the equipment supported by the proposed tower, and from the proposed road reconstruction.
Transportation and Roads	Negligible long-term impacts	 Minor, site-specific and local, short- and long- term impacts from road reconstruction and minor increase in traffic flow Minor, local, long-term, beneficial impacts by increasing road quality
Recreation	Negligible long-term impacts	Minor, site-specific and local, long-term impacts from enhanced access to the site and surrounding areas

 TABLE 2-1

 COMPARISON OF ALTERNATIVES AND ENVIRONMENTAL CONSEQUENCES