

**BENEFITS TO THE LOCAL AND STATE ECONOMY.**

Some segments of the public wanted to know if changes in travel management could provide financial benefits to the local and State economy. Similarly, they wanted to know if there could be potential economic effects on local outfitter/guide businesses.

**1. EXISTING CONDITION**

**a. National Perspective**

Outdoor recreation is big business in the United States economy, but it is difficult to determine the magnitude of spending attributable to specific activities. Richard Stenger (1999) found that many sources of specific consumer spending are proprietary information held by industry, various economic studies use different computational and accounting methods, and assigning consumer spending to specific activities is subjective. Consequently, it takes considerable effort and careful evaluation to glean current economic information from the variety of sources that report on consumer spending.

Despite the fact that some data are more than 10 years old, available information indicates that there are large expenditures in a variety of outdoor recreation activities, and that all activities are an important component of the national economy. In his 1999 report, Stenger summarized the following from a 1996 report by the Sporting Goods Manufacturing Association.

**Table III-66. Wholesale Value of Selected Equipment in 1994-95**

<b>Wholesale Value of Annual Manufacturers Shipments In the United States by Type of Equipment and Year</b>		
<b>Type of Equipment</b>	<b>1994</b>	<b>1995</b>
Camping	\$1.375 billion	\$1.508 billion
Firearms and Hunting	\$1.781 billion	\$1.675 billion
Cross-country Snow Skiing	\$0.036 billion	\$0.037 billion
Hiking & Outdoor Footwear	\$0.485 billion	\$0.625 billion
Fishing	\$1.400 billion	\$1.500 billion
Motorcycles / ATVs	\$1.320 billion	\$1.300 billion
Snowmobiles	\$0.300 billion	\$0.290 billion
Bicycles and Accessories	\$1.800 billion	\$1.813 billion

In addition, Molly Chaffinch of the American Horse Council (1999) estimates an annual economic impact of \$28.3 billion from recreational use of horses in the U.S., not including events such as racing, shows, and rodeos. Besides goods and equipment, travel expenses make up a major part of outdoor recreation related expenditures. Stenger (1999) used data from the Travel Industries Association to estimate \$46.53 billion was spent in 1995 on travel expenses associated with outdoor recreation. The above table points out that no single recreational activity has the economic edge over other activities. All types of recreation are important factors in national, state, and rural economies; and there are opportunities for businesses in rural communities to be supported by a broad spectrum of recreationists.

In rural areas near large public land holdings, it is not uncommon for a large portion of the economic activity to be caused by tourists and other visitors to the area. Local residents' spending also creates some of the jobs and incomes, as do visitors on trips for purposes other than outdoor recreation, such as for business or for family matters.

It is not easy to determine what portion of local jobs and incomes is due to recreation visitation. A national study by English and Marcoullier (1999) shows that 472 rural counties

(about 21% of the total counties in the USA) are dependent upon nonresident recreation visitation to support 6% of the local jobs and 3.3% of the local income. Glacier County in Montana appears to be the only county in the Rocky Mountain Division with an even greater dependence upon nonresident recreation visitation.

**b. Local and State Industries**

Economic diversity, which is generally associated with resiliency, varies tremendously across the area influenced by the Lewis and Clark National Forest. In an economic assessment of the Lewis and Clark National Forest, Keith Stockmann and Fred Stewart (2002) combined a Shannon-Weaver economic diversity index with other economic indicators to generate an overall ranking of each county’s vulnerability to Forest Service management decisions. Of the 13 counties influenced by the Lewis and Clark Forest, only 4 counties were considered vulnerable to Forest Service decisions involving timber, grazing, and mining. The following list shows the composite ranking of economic vulnerability involving these three industries.

**Table III-67. Economic Composite Ranking\*  
Lewis and Clark National Forest Counties**

COUNTY	RANKING
Cascade County	1. (Least Vulnerable)
Lewis and Clark County	2.
Teton County	3.
Choteau County	4.
Fergus County	5.
Pondera County	6.
Toole County	7.
Golden Valley County	8.
Musselshell County	9.
Glacier County	10.
Wheatland County	11.
Judith Basin County	12.
Meagher County	13. (Most Vulnerable)

\*Source: Stockmann, K. and F. Stewart, 2002, “An Assessment of the Lewis and Clark National Forest Economic Area.

For all 13 counties, Stockmann and Stewart also noted that “forest recreation serves as a part of the standard of living for residents and as a major attractant for tourism, which has kept the retail and service sectors growing in many of the counties”.

Small businesses are very important to Montana’s economy. Employment data shows that about 41% of the state’s wage and salary jobs are with firms employing fewer than 20 people –and about 75% are with businesses employing fewer than 100 people (MT Dept. Labor & Industry, 2004). Appendix J presents data from the United States Department of Commerce (1997) showing retail trade as the industry with the largest number of employees in the four counties in the Rocky Mountain Division, and in Montana. (See Appendix J for definitions of industries.) Retail trade includes all types of businesses that sell products directly to the consumer, such as grocery stores, convenience stores, sporting goods stores, motor vehicle and parts dealers, motorcycle and ATV dealers, gasoline stations, clothing and shoe stores, jewelry and cosmetic stores, hardware and lumber stores, and general merchandise stores.

Accommodations and food services industry ranks second or third behind retail trade in the local counties and the state in providing employment for people. The arts, entertainment, and

recreation industry, which includes businesses such as outfitters, casinos, marinas, ski areas, golf courses, and fitness centers, employs considerably fewer people in three of the four counties in the Rocky Mountain Division.

**Table III-68. Number of Employees and Annual Payroll for 4 Counties and Montana**

INDUSTRY	NUMBER OF EMPLOYEES AND ANNUAL PAYROLL*				
	GLACIER COUNTY	LEWIS & CLARK COUNTY	PONDERA COUNTY	TETON COUNTY	MONTANA
Retail Trade	426 \$6,790,000	3,196 \$49,667,000	260 \$4,159,000	247 \$3,563,000	48,337 \$746,459,000
Accommodations & Food Service	403 \$4,445,000	2,352 \$18,184,000	c (100-249) D (withheld)	122 \$816,000	38,551 \$325,510,000
Arts, Entertainment, Recreation	5 \$106,000	507 \$4,695,000	a (0-19) D (withheld)	8 \$112,000	6,830 \$75,763,000

\* -- excerpt from data in Appendix J. a, c, D – explained in Appendix J

Tourism brings a lot of people and money to the state. The Institute for Tourism and Recreation at the University of Montana (McMahon, K. and K. Cheek, 1998) provided the following information on the economic influence of non-residents in Montana.

**Table III-69. Expenditure Profiles of Non-Resident Visitors in Montana\***

SEASON OF VISIT	NUMBER OF GROUPS	AVERAGE LENGTH OF STAY	AVERAGE DAILY EXPENDITURES	TOTAL ANNUAL EXPENDITURES
Summer Visitors (June, July, Aug., Sept.)	2,232,000	4.5 days	\$101	\$970 million
Winter Visitors (Dec., Jan., Feb., March)	610,000	4.1 days	\$96	\$240 million
Shoulder Season (April, May, Oct., Nov.)	947,000	3.9 days	\$82	\$300 million
All Visitors	3,789,000		\$99	\$1.513 billion

\* Source: McMahon, K. and K. Cheek, 1998, "Expenditure Profiles and Marketing Responsiveness of Nonresident Visitor Groups to Montana".

Tourists as shown in the preceding table are coming to Montana for a variety of reasons, such as vacations, visiting friends and relatives, business, just passing through, meetings, shopping, medical, and other reasons. Vacations, recreation, and pleasure attract 49% of the summer visitors, and 20% of the winter and shoulder season visitors. However, the data are not specific as to why people are coming to Montana for vacations and recreation, such as snowmobiling, skiing, Wilderness trips, OHV riding, hunting, fishing, boating, etc.

The Bureau of Business and Economic Research at the University of Montana suggests that nonresidents engaged in snowmobiling enjoyed about 204,000 activity days and brought about \$44.1 million of new money into Montana's economy in 2002 (Sylvester, 2002). This report also suggests that residents spent about \$30 million on trip expenses, and another \$70 million on yearly expenses to engage in snowmobiling during 2002.

### **c. Population and Employment**

The population of central Montana is relatively sparse, and is declining in three of the four counties in the Rocky Mountain Division as shown in Appendix K. Over 90% of the people are white, except in Glacier County where American Indians comprise a higher proportion of the population.

Of the population over 16 years old, approximately 61% are employed, 4% unemployed, and 35% are not in the labor force. These percentages are different in the four local counties, where about 55% are employed, 2%-9% unemployed, and 40% are not in the labor force.

**Table III-70. Employment / Unemployment Data for 4 Counties & Montana**

AREA	Population 16 years & over	In Labor Force		Not in Labor Force
		Employed	Unemployed	
GLACIER COUNTY	9,110	4,750 (52.1%)	863 (9.5%)	3,497 (38.4%)
LEWIS & CLARK COUNTY	43,363	28,651 (66.1%)	1,538 (3.5%)	13,015 (30.0%)
PONDERA COUNTY	4,779	2,699 (56.5%)	199 (4.2%)	1,871 (39.2%)
TETON COUNTY	4,888	2,719 (55.6%)	104 (2.1%)	2,054 (42.0%)
<b>MONTANA</b>	<b>701,168</b>	<b>425,977 (60.8%)</b>	<b>28,710 (4.1%)</b>	<b>242,862 (34.6%)</b>

Data from USDC – Census Bureau, Census 2000 Summary File 3, <http://factfinder.census.gov>

About 69% of workers in Montana are employed in private industry, 18% are employees of a government entity, 12% are self-employed, and less than 1% are unpaid family workers. These percentages are only slightly different in the four local counties, except that Glacier County has a higher percentage of government employees.

**Table III-71. Class of Worker for 4 Counties & Montana**

AREA	Private wage and salary workers	Government workers	Self-employed workers in own business	Unpaid family workers
GLACIER COUNTY	2,155 (45.4%)	2,117 (44.8%)	384 (8.1%)	94 (2.0%)
LEWIS & CLARK COUNTY	17,901 (62.5%)	8,076 (28.2%)	2,594 (9.1%)	80 (0.3%)
PONDERA COUNTY	1,600 (59.3%)	620 (23.0%)	422 (15.6%)	57 (2.1%)
TETON COUNTY	1,661 (61.1%)	490 (18.0%)	525 (19.3%)	43 (1.6%)
<b>MONTANA</b>	<b>294,631 (69.2%)</b>	<b>78,123 (18.3%)</b>	<b>50,112 (11.8%)</b>	<b>3,111 (0.7%)</b>

Data from USDC – Census Bureau, Census 2000 Summary File 3 <http://factfinder.census.gov>

#### **d. Spending Profiles of Lewis and Clark National Forest Visitors**

In 1998 a group of Forest Service research and staff officers were appointed to investigate and pilot a recreation sampling system that would provide statistical recreation use information at the forest, regional, and national level. The National Visitor Use Monitoring (NVUM) program was developed as a result of their work, which entails a four-year cycle of data collection. In any given year, 25 percent of the national forests conduct on-site interviews and sampling of recreation visitors. The first cycle of data collection began in 2000. The Lewis and Clark National Forest participated in the NVUM project from October 2000 through September 2001. The information that follows is statistically valid and applicable at the forest level, but is not designed to be accurate at the ranger district or site level.

A total of 1,108 visitors were contacted on the Lewis and Clark Forest during the sample year. Of the 1,061 people who agreed to be interviewed, some were asked to complete a basic questionnaire, some were asked to fill out an economic questionnaire, and some were asked to complete a satisfaction questionnaire. The economic form did not ask questions about satisfaction, the satisfaction form did not ask questions about economics, and the basic form did not ask questions about either satisfaction or economics.

Economic information obtained from the surveys includes the following. Less than 1% of those interviewed in Wilderness said they used the services of a commercial guide. The

average length of stay in Wilderness was 74.7 hours. Four percent of visitors were from another country. The average length of stay on the forest was 27.4 hours. Forty-seven percent of visitors stayed overnight on the forest. In a typical year, visitors to the Lewis and Clark Forest spent an average of \$3,019.20 on all outdoor recreation activities including equipment, trips, memberships, and licenses. (Kocis, et.al., 2002).

Data obtained during the 2000-2001 interviews on the Lewis and Clark Forest were combined with data from other national forests to develop spending profiles of visitors. The national data show that the Lewis and Clark Forest is one of 17 Forests that have below average spending on outdoor recreation. Using the process described by Daniel Stynes and Eric White (2004), the following table was developed to show the economic influence of visitors to the Lewis and Clark National Forest.

**Table III-72. Visitor Spending for Lewis and Clark National Forest Using NVUM data<sup>a</sup>**

	NON-LOCAL RESIDENTS			LOCAL RESIDENTS			Non-Primary	Total
	Day Use	Overnight on NF	Overnight off NF	Day Use	Overnight on NF	Overnight off NF		
<b>Recreation Visits<sup>b</sup></b>								476,484
<b>Segment shares</b>	11%	7%	19%	38%	11%	8%	5%	100%
<b>Visits by Segment</b>	52,943	33,691	91,446	182,893	52,943	38,504	24,064	476,484
<b>Party Size</b>	2.2	2.2	2.2	2.2	2.2	2.2	2.2	
<b>Party Visits</b>	24,065	15,314	41,566	83,133	24,065	17,502	10,938	216,583
<b>Spending (\$/Party/Trip)</b>	\$39.74	\$101.99	\$143.25	\$28.52	\$85.40	\$83.52	\$114.73	
<b>Spending Totals (Millions of \$)</b>	\$0.956	\$1.562	\$5.954	\$2.371	\$2.055	\$1.462	\$1.255	<b>\$15.615 million</b>

<sup>a</sup> Stynes, D. and E. White, October 2004, "Spending Profiles of National Forest Visitors, 2002 Update".

<sup>b</sup> Kocis, et. al., August 2002, "National Forest Visitor Use Monitoring Results".

These data are only valid for the entire Lewis and Clark National Forest. Trying to apportion a percentage of the expenditures to recreation on just the Rocky Mountain Ranger District would not be statistically valid. Nonetheless, the data show that visitors engaged in recreation on the Lewis and Clark National Forest spend a considerable amount of money in the economy. Local residents (defined as living within 50 miles of the Forest) spend \$5.888 million in comparison to \$8.472 million spent by people living more than 50 miles away.

Expenditures on specific recreation activities on the Lewis and Clark Forest were not estimated from the current data, but some information with economic implications was gleaned from the national data. For example, visitors whose primary activity is a motorized activity spend greater amounts than are spent on an average day trip. Hunters, whether local or non-local, spend considerably more than is spent on an average day trip or overnight trip for other activities. Campers staying in developed campgrounds spend 40-60% more than primitive campers. Fees for camping account for some of the difference, but people camping in developed facilities also spend almost twice as much on groceries. Campers from the local area spend less than those from outside the local area. Spending averages for biking, hiking, and driving for pleasure on day trips are about a third less than the general day trip averages.

### **e. Past Trends for Two Indicators**

Standard industry categories do not distinguish between the types of businesses that people believe could be affected by changes in travel management on public lands. Businesses commonly associated with motorized recreation, such as OHV dealers, are lumped in with other retail businesses such as lumber yards and jewelry stores to develop industry data. Businesses commonly associated with non-motorized types of recreation, such as outfitters, are lumped in with other arts, entertainment, and recreation businesses such as casinos, marinas, golf courses, and fitness centers to develop industry data. Consequently, it is very difficult to sort out the economic effects of particular types of businesses in a local economy. To obtain some insight as to the potential economic effects some businesses may have, data on OHV sales and registration and outfitter/guide services are presented below.

Off-highway-vehicle sales may be one way to evaluate potential effects of motorized recreation in a local economy. The following table shows sales data for Montana and the United States, and in parentheses shows Montana's rank among the 50 states. These data show that there is an increasing number of OHVs being sold in Montana.

**Table III-73. OHV Sales Data in Montana and United States**

Type OHV	Montana New Retail Sales			United States New Retail Sales		
	1995	2001	% Change	1995	2001	% Change
Off-Highway Motorcycle	724 (37 <sup>th</sup> )	1,918 (39 <sup>th</sup> )	164.9%	270,209	90,679	198.0%
ATV	2,923 (33 <sup>rd</sup> )	5,640 (39 <sup>th</sup> )	93.0%	277,787	729,054	162.5%
<b>Total</b>	<b>3,647 (34<sup>th</sup>)</b>	<b>7,558 (39<sup>th</sup>)</b>	<b>107.2%</b>	<b>368,466</b>	<b>999,263</b>	<b>171.2%</b>

Source: Motorcycle Industry Council Retail Sales Report, based on actual sales registrations from Arctic Cat, Bombardier, Honda, Kawasaki, KTM, Polaris, Suzuki, and Yamaha. Off-highway includes dual sport motorcycles.

In order to be ridden in Montana, an OHV and snowmobile must be registered annually. The following data show how many of each type of vehicle have been registered over the past 10 years. Note that 2004 was the first year that residents could obtain a permanent registration sticker for their OHV or snowmobile, and it appears that a large number of residents took advantage of that opportunity.

**Table III-74. Number of Registered OHVs / Snowmobiles in Montana**

YEAR	OHVs		SNOWMOBILES	
	Number Registered	Percent Change	Number Registered	Percent Change
2004	33,394	+ 17.0 %	25,965	+ 11.7 %
2003	28,533	+ 9.3 %	23,240	- 6.0 %
2002	26,107	+ 12.8 %	24,795	+ 0.7 %
2001	23,151	+ 15.6 %	24,629	+ 5.1 %
2000	20,033	- 2.1 %	23,440	+ 3.5 %
1999	20,463	+ 8.0 %	22,653	+ 11.0 %
1998	18,953	+ 15.9 %	20,401	- 5.0 %
1997	16,352	+ 6.5 %	21,467	+ 5.2 %
1996	15,352	+ 9.1 %	20,398	+ 1.8 %
1995	14,072	+ 6.9 %	20,030	+ 7.8 %

Source: Montana Dept. of Justice, Title & Registration Bureau.

**Table III-75. Number of Registered OHVs / Snowmobiles in 2004 for Local Counties**

COUNTY	REGISTERED OHV's	REGISTERED SNOWMOBILES
Glacier County	307	246
Pondera County	302	196
Teton County	230	144
<b>SUB-TOTAL</b>	<b>839</b>	<b>586</b>
Lewis and Clark County	2,324	1,804
Cascade County	2,048	1,561

Source: Montana Dept. of Justice, Title & Registration Bureau.

Information about outfitter use and income on National Forest System lands is more available on a local basis, because they operate under permits administered by the Forest Service. The following information was developed from records of the outfitter businesses that operate in a portion of the Rocky Mountain Ranger District. It does not include data on outfitters that operate on private lands, or that operate entirely on other National Forests. These data show a declining number of service days over a 12 year period on both Wilderness and non-wilderness lands. Outfitters generally cite the fire season, economy, September 11 terrorist attack, and shorter vacation times as the reasons fewer clients are booking trips.

**Table III-76. Outfitter Use & Income on Rocky Mountain Ranger District**

OUTFITTER INFO	1990	1996	2002
Number of outfitters	21	18	17
Average Annual Income per Outfitter	\$53, 145	\$87,751	\$112,562
Annual Contribution to Local Economy	\$1,116,045	\$1,579,518	\$1,913,554
Service Days Used:			
Wilderness – Fall	3,611	3,039	2,700
Wilderness – Summer	2,193	4,671	2,651
SUB-TOTAL	5,804	7,710	5,351
Non-wilderness – Fall	1,391	1,572	895
Non-wilderness – Summer	4,897	4,222	2,693
Non-wilderness – Spring Bear	29	42	55
Non-wilderness -- Winter	986	894	899
SUB-TOTAL	7,303	6,730	4,542
TOTAL	13,107	14,440	9,893

**f. Future Trends**

Appendix L contains three different projections on employment in selected occupations. Two of these projections came from the United States Department of Labor, and one projection was by the Montana Department of Labor and Industry. All three projections show a steady increase in growth in most industries and most occupations by about 1.5% to 2.0% annually through 2010. The projection by the Montana Department of Labor shows a decline of almost 2% annually in the agriculture industry, but a 3% annual increase in veterinary services. Likewise, the Montana Department of Labor projections show a higher than average increase in jobs for RV dealers (4%), motorcycle dealers (3%), and snowmobile dealers (4%). Note that state rates and county rates will vary depending on changes in county population growth rates.

### **g. Desired Condition**

Diversity is the key to maintaining a steady, healthy and resilient economy. Economies that are comprised of a wide variety of industries are better able to adapt to changes than economies that are supported by only one or two major industries. In that sense, it would be desirable to maintain a local economy influenced by the Rocky Mountain Division that is comprised of a wide variety of retail, agricultural, and other industries.

## ***2. ENVIRONMENTAL CONSEQUENCES***

### **a. Alternative 1 - No Action Alternative**

#### ***1. Direct and Indirect Effects***

There is no indication that current travel management on the Rocky Mountain Ranger District has an effect on the local economy. Relatively few businesses cater specifically to people with OHVs and snowmobiles, and it would appear that most of their business is from local residents that engage in motorized recreation. The Rocky Mountain Division is not a destination point that attracts OHV and snowmobile riders from around the state or from other distant locations.

On the other hand, the Rocky Mountain Ranger District is a destination point that attracts people interested in taking a trip into the Wilderness. Several outfitter and resort businesses cater specifically to people wanting to take a pack trip into the backcountry, or who just want to enjoy the scenery in the area. There is no indication that their businesses are being affected by the current level of motorized travel allowed on non-Wilderness trails. Several outfitter and resort owners indicate that the fluctuations in number of clients they do business with is due to factors such as wildfires in the area or state, the national economy, and more people taking several short vacations rather than one long vacation. The downward trend in number of service days reported by outfitters does seem to occur equally in both Wilderness and non-wilderness trips. There was low fire activity in Montana during 2002. This should not have been a factor in the number of clients that used outfitter services during that year. It is likely that the lower number of service days reported in 2002 is due to national economic influences.

#### ***2. Cumulative Effects***

Activities such as the proposed oil and gas drilling in the Badger-Two Medicine area would have their own effects on the local economy, and would cumulatively affect the local and state economy. Gas production would generate jobs and tax revenues, but could reduce visitors to the immediate area, reducing revenues or economic impact from those visitors. Similarly, other activities listed in Appendix M such as prescribed burning, rehabilitation of campgrounds, trail and road maintenance, and pipeline expansion would have cumulative effects upon the economy as they improve conditions for recreationists.

### **b. Action Alternatives 2-5**

#### ***1. Direct and Indirect Effects***

There is no indication that any of the action alternatives would have an effect on the local economy. Management of travel on a designated system of roads and trails is not likely to attract additional traffic, nor discourage people from visiting the area.

Alternatives 2 and 4 retain a mix of opportunities for motorized and non-motorized recreation, and have the least potential to affect the local economy. People that engage in these forms of recreation would continue to find opportunities to enjoy themselves, and would continue to support the types of businesses that cater to their needs.

Alternative 3 would prohibit all motorized travel on trails, and prohibit all cross-country snowmobiling. It is unlikely that additional people would be attracted to the area due to the exclusion of motorized recreation, because there is no indication that people are currently avoiding the area. Outfitters already spend about half of their service days in non-wilderness areas, and there is limited opportunity to expand their businesses into new areas. The elimination of snowmobiling will likely result in fewer visitors to the area during the winter.

Prohibiting OHV and snowmobile use in the Badger-Two Medicine area (as proposed in Alts. 3 and 5) would eliminate the primary motorized recreation area for people in Cut Bank and surrounding communities. It is unlikely that this would cause people to sell their OHVs and snowmobiles, thereby affecting the local dealers. It is more likely that people displaced by restrictions on motorized travel would find new areas to enjoy their sport. Displaced local OHV and snowmobile riders probably would spend more money on travel (gas, food, lodging) in other parts of Montana/Canada if they find suitable riding areas, which could shift some economic effects to other communities. For example, gas and food purchases in Browning and East Glacier may shift to Great Falls and Neihart. Considering there are 839 OHVs and 586 snowmobiles registered in the three counties immediately adjacent to the Rocky Mountain Division, this could result in a considerable shift of spending.

Indirectly, a ban on motorized travel in all or major portions of the Rocky Mountain Division could influence more private landowners to develop OHV riding trails on their property. Or it could result in more violations on NFS lands, and trespass on private lands if no suitable OHV riding areas are available within an acceptable driving distance.

## ***2. Cumulative Effects***

Activities such as the proposed oil and gas drilling in the Badger-Two Medicine area would have their own effects on the local economy, and would not be influenced by changes in travel management. Similarly, other activities listed in Appendix M such as prescribed burning, rehabilitation of campgrounds, trail and road maintenance, and pipeline expansion would effect the local economy, which, in combination with reductions in motorized use through travel planning, may actually reduce spending in the local communities.

### **c. Effects Common To All Alternatives**

#### ***1. Direct, Indirect, and Cumulative Effects***

There are no known direct, indirect, or cumulative effects common to all alternatives.

### **d. Effects Common To All Action Alternatives**

#### ***1. Direct, Indirect, and Cumulative Effects***

There are no known direct, indirect, or cumulative effects common to all alternatives.