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Submitted via e-mail: 4FRI_comments@fs.fed.us

August 11, 2016

Re: 4FRI Rim Country Scoping Comments

Dear Ms. Fredette and the 4FRI Rim Country Planning Team:

Thank you for the opportunity to provide scoping comments on the 4FRI Rim Country Project. WildEarth Guardians is a nonprofit conservation organization with offices in Tucson, Arizona, Santa Fe, New Mexico, and five other states. WildEarth Guardians has more than 160,000 members and activists across the United States and the world. We protect and restore wildlife, wild places, wild rivers, and the health of the American West.

The issues we would recommend you incorporate into your Draft EIS fall under two primary issues: roads and Mexican spotted owl.

Minimum Road System

The Forest Service faces many challenges with its vastly oversized, under-maintained, and unaffordable road system. The impacts from roads to water, fish, wildlife, and ecosystems are tremendous and well documented in scientific literature. Given that the 4FRI Rim Country Project is considering changes to a large number of miles of roads, and given its large geographic scale, this is precisely the type of project where the Forest Service must consider its Travel Analysis Reports (TARs) for the three national forests, and more importantly, it must identify the Minimum Road System (MRS).¹ We urge the Forest Service to carefully evaluate the proposed 4FRI Rim Country Project and its alternatives through this lens. This type of large-scale project is the perfect opportunity to begin making on-the-ground progress towards an economically and environmentally sustainable road network.

We are very encouraged to see this project considering ecosystem restoration on a large scale to address many of the factors that continue to degrade ecosystems. We fully support ecosystem

¹ 36 C.F.R. § 212.5(b)(1) (“For each national forest . . . the responsible official must identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands.”).

restoration, especially the project components that address water quality and aquatic habitats and improve watersheds and forest resiliency by returning expensive and deteriorating forest roads to the wild.

To address its sustainable and deteriorating road system, the Forest Service promulgated the Roads Rule (referred to as “subpart A”) in 2001. 66 Fed. Reg. 3206 (Jan. 12, 2001); 36 C.F.R. part 212, subpart A. The Roads Rule created two important obligations for the agency. One obligation is to identify unneeded roads to prioritize for decommissioning or to be considered for other uses. 36 C.F.R. § 212.5(b)(2). Another obligation is to identify the MRS needed for safe and efficient travel and for the protection, management, and use of National Forest system lands. *Id.* § 212.5(b)(1).² The MRS is the road system, determined by the Forest Service, as needed to:

- Meet resource and other management objectives adopted in the relevant land and resource management plan,
- Meet applicable statutory and regulatory requirements,
- Reflect long-term funding expectations, and
- Ensure that the identified system minimizes adverse environmental impacts associated with road construction, reconstruction, decommissioning, and maintenance.

Id. (hereafter, MRS factors). *See also* Memorandum from Leslie Weldon to Regional Foresters *et al.* on Travel Management, Implementation of 36 CFR, Part 212, Subpart A (Mar. 29, 2012) (hereafter, 2012 Weldon Memo). The goal of subpart A is “to maintain an appropriately sized and environmentally sustainable road system that is responsive to ecological, economic, and social concerns.”³

The Forest Service’s Washington Office has issued a series of directive memoranda that outline how the agency expects forests to comply with subpart A.⁴ Pursuant to its own regulations and directive memoranda, the Forest Service must consider the valid portions of its TARs and begin to determine the MRS in its analysis of site-specific projects of the appropriate geographic size under NEPA. *See* 2012 Weldon Memo at 2 (directing forests to “analyze the proposed action and alternatives in terms of whether, per 36 CFR 212.5(b)(1), the resulting [road] system is needed”). By analyzing whether a proposed project is consistent with the relevant portions of the TAR, and considering the MRS factors under 36 CFR 212.5(b)(1), the Forest Service expects each forest to identify the MRS for particular forest segments. *Id.* (“The resulting decision [in a site-specific project] identifies the MRS and unneeded roads for each subwatershed or larger scale”).

² In promulgating its rules, the Forest Service indicated that “[t]he requirement to identify roads for decommissioning is ‘[e]qually important’ as the overall identification of the minimum road system.” *Center for Sierra Nevada v. U.S. Forest Service*, 832 F. Supp. 2d 1138 (E.D. Cal. 2011) (quoting 66 Fed. Reg. at 3207).

³ *See* 2012 Weldon Memo at 1 (“The national forest road system of the future must continue to provide needed access for recreation and resource management, as well as support watershed restoration and resource protection to sustain healthy ecosystems.”). *See also* Memorandum from Joel Holtrop, U.S. Forest Service Washington Office, to Regional Foresters *et al.* (Nov. 10, 2010) (hereafter, 2010 Holtrop Memo) (“Though this process points to a smaller road system than our current one, the national forest road system of the future must provide needed access for recreation and resource management and support watershed restoration and resource protection to sustain healthy ecosystems and ecological connectivity.”).

⁴ 2010 Holtrop Memo; 2012 Weldon Memo; Memorandum from Leslie Weldon, U.S. Forest Service Washington Office, to Regional Foresters *et al.* (Dec. 17, 2013) (hereafter, 2013 Weldon Memo) (supplementing and reaffirming the 2012 Weldon Memo).

It is now time for the Forest Service to take the next step under subpart A: identify the MRS through site-specific projects subject to NEPA.⁵

This project provides the appropriate geographic scale for the Forest Service to identify the MRS. The Forest Service's Washington Office has directed forests to use the TAR to identify the MRS for proposed actions at the scale of a 6th code subwatershed or larger. 2012 Weldon Memo at 2. *See also* 2012 FAQs (noting that "travel analysis and identification of the MRS could be done at the same scale, if that scale is at the ranger district or unit level."). Plus, consideration of the MRS factors at 36 C.F.R. § 212.5(b)(1) only makes sense on a larger geographic scale.

Pursuant to the plain language of the agency's own regulations and directive memoranda interpreting those regulations, the Forest Service must identify the MRS when analyzing the 4FRI Rim Country Project under NEPA. *See, e.g.*, 2012 Weldon Memo at 2 ("Travel analysis should be used to inform the environmental analysis.")

Subpart A directs the agency to "identify the roads on lands under Forest Service jurisdiction that are no longer needed."⁶ It refers to all roads, not just National Forest System roads. The rules define a road as "[a] motor vehicle travelway over 50 inches wide, unless designated and managed as a trail."⁷

The Forest Service must ensure that the actions proposed under the 4FRI Rim Country Project are consistent with subpart A. Here, this project proposes to decommission approximately 230 miles of system and unauthorized roads on the Coconino and Apache-Sitgreaves and 20 miles of unauthorized roads on the Tonto, and improve 150 miles of road, and build 350 miles of temporary roads. The forest must assess these proposed actions in relation to the TARs as well as the factors for an MRS, with the goal of minimizing adverse environmental impacts. Specifically, the decisions to close, decommission, or maintain certain roads should reflect the results from the risks and benefits analysis in the TARs. Routes identified for decommissioning through the TARs or other processes within the project area must be closed, decommissioned, and reclaimed to a stable and more natural condition during the life of the project. To the extent that the final decision in this project differs from what is recommended in the TARs, the Forest Service must provide an explanation for that inconsistency.

The Forest Service should prioritize road decommissioning in this project to enhance landscape connectivity and ecological integrity based on:

- Effectiveness in reducing fragmentation, connecting un-roaded and lightly-roaded areas, and improving stream segments, with a focus on inventoried roadless areas, important watersheds, and other sensitive ecological and conservation areas and corridors;

⁵ *See* 2012 Weldon Memo ("The next step in identification of the MRS is to use the travel analysis report to develop proposed actions to identify the MRS . . . at the scale of a 6th code subwatershed or larger. Proposed actions and alternatives are subject to environmental analysis under NEPA. Travel analysis should be used to inform the environmental analysis.")

⁶ 36 C.F.R. § 212.5(b)(2). *See also* *Center for Sierra Nevada*, 832 F. Supp. 2d at 1155 ("The court agrees that during the Subpart A analysis the Forest Service will need to evaluate all roads, including any roads previously designated as open under subpart B, for decommissioning.")

⁷ 36 C.F.R. § 212.1.

- Benefit to species and habitats, including restoring aquatic and terrestrial habitats and habitat connections;
- Addressing impaired or at-risk watersheds;
- Achieving motorized route density standards; and
- Enhancement of quiet recreation experiences.

The Forest Service should use the National Best Management Practices for Water Quality Management on National Forest System Lands (Volume 1, April 2012) (*available at http://www.fs.fed.us/biology/resources/pubs/watershed/FS_National_Core_BMPs_April2012.pdf*) to guide road management in determining the MRS. The BMP program “was developed to improve agency performance and accountability in managing water quality consistent with the Federal Clean Water Act (CWA) and State water quality programs” and “[c]urrent Forest Service policy directs compliance with required CWA permits and State regulations and requires the use of BMPs to control nonpoint source pollution to meet applicable water quality standards and other CWA requirements.” National Best Management Practices. It directs forests to:

- Design the transportation system to meet long-term land management plan desired conditions, goals, and objectives for access rather than to access individual sites.
- Limit roads to the minimum practicable number, width, and total length consistent with the purpose of specific operations, local topography, geology, and climate to achieve land management plan desired conditions, goals, and objectives for access and water quality management.

Id. at 104.

We urge the Coconino, Apache-Sitgreaves and Tonto National Forests to limit their road networks to those roads that are necessary for access and management, and which can be adequately maintained within agency budgets and capabilities. While it appears the Coconino and Apache-Sitgreaves are taking this responsibility serious, it also appears the Tonto is not. We encourage road decommissioning and reductions in road density to improve watershed conditions and aquatic health in streams, as well as to protect and enhance wildlife habitat and connectivity. The Forest Service should continue working to reduce sediment delivery from roads, improve or remove road crossings, and close or decommission roads that cannot be adequately maintained.

National Forests provide a range of significant environmental and societal benefits, including clean air and water, habitat for myriad wildlife species, and outdoor recreation opportunities for millions of visitors and local residents each year. *See* 66 Fed. Reg. 3244, 3245-47 (Jan. 12, 2001) (Preamble to Roadless Area Conservation Rule describing key ecosystem and other services of roadless National Forest lands). The Forest Service’s extensive and decaying road system, however, poses a growing liability to the future ability of the National Forests to provide critical environmental, ecosystem, and recreation services. Collectively, the National Forest System contains over 370,000 miles of roads (not even counting the tens of thousands of additional miles of unclassified, non-system, temporary, and user-created roads). That is nearly eight times the length of the entire U.S. Interstate Highway System. The National Forest road system is primarily a byproduct of the big timber era. The system is often convoluted, unmanageable, and ineffective at meeting 21st century transportation needs. Much of the system is in serious disrepair: as of the end of Fiscal Year 2015, the National Forest

road system had a 3 billion dollar maintenance backlog. USDA, Forest Service, National Forest System Statistics 2015.

Well-sited and maintained roads provide important services to society. But the adverse ecological and environmental impacts associated with the Forest Service's massive and deteriorating road system are well documented. Those adverse impacts are long-term, occur at multiple scales, and often extend far beyond the actual "footprint" of the road. Included in these comments is a 2014 literature review from The Wilderness Society that surveys the extensive and best available scientific literature—including the Forest Service's General Technical Report synthesizing the scientific information on forest roads (Gucinski 2001)—on a wide range of road-related impacts to ecosystem processes and integrity on National Forest lands. See The Wilderness Society, *Transportation Infrastructure and Access on National Forests and Grasslands: A Literature Review* (May 2014) (attached as Exhibit A).

Erosion, compaction, and other alterations in forest geomorphology and hydrology associated with roads seriously impair water quality and aquatic species viability. See Exhibit B at 2-4. Roads disturb and fragment wildlife habitat, altering species distribution, interfering with critical life functions such as feeding, breeding, and nesting, and resulting in loss of biodiversity. *Id.* at 4-6. Roads facilitate increased human intrusion into sensitive areas, resulting in poaching of rare plants and animals, human-ignited wildfires, introduction of exotic species, and damage to archaeological resources. *Id.* at 6, 9. Roads are also major vectors for spreading weeds.

A robust analysis under NEPA of the forest road system and its environmental and social impacts is especially critical in the context of climate change. As the CEQ's recent draft guidance on addressing climate change in NEPA analyses recognizes, "[c]limate change can increase the vulnerability of a resource, ecosystem, human community, or structure, which would then be more susceptible to climate change and other effects and result in a proposed action's effects being more environmentally damaging." CEQ, *Revised Draft Guidance for Greenhouse Gas Emissions and Climate Change Impacts* (Dec. 18, 2014), at 22. The draft CEQ guidance makes clear that "[s]uch considerations are squarely within the realm of NEPA, informing decisions on whether to proceed with and how to design the proposed action so as to minimize impacts on the environment, as well as informing possible adaptation measures to address these impacts, ultimately enabling the selection of smarter, more resilient actions." *Id.*

Climate change intensifies the adverse impacts associated with roads. The Forest Service should consider the risk of increased disturbance when analyzing this proposed project. For example, as the warming climate alters species distribution and forces wildlife migration, landscape connectivity becomes even more critical to species survival and ecosystem resilience. *Id.* at 9-14. See also USDA, Forest Service, *National Roadmap for Responding to Climate Change* at 26 (2011), available at <http://www.fs.fed.us/climatechange/pdf/Roadmapfinal.pdf> (recognizing importance of reducing fragmentation and increasing connectivity to facilitate climate change adaptation).

Climate change is also expected to lead to more extreme weather events, resulting in increased flood severity, more frequent landslides, altered hydrographs, and changes in erosion and sedimentation rates and delivery processes. Many National Forest roads are poorly located and designed to be temporarily on the landscape, making them particularly vulnerable to these climate alterations. Even those designed for storms and water flows typical of past decades may fail under future weather scenarios, further exacerbating adverse ecological impacts, public safety concerns, and maintenance

needs. The Forest Service should analyze in detail the impact of climate change on forest roads and forest resources.

The President's Executive Order 13,653 (Nov. 2013) provides direction on "Preparing the United States for the Impacts of Climate Change." The Order recognizes that "[t]he impacts of climate change – including an increase in prolonged periods of excessively high temperatures, more heavy downpours, an increase in wildfires, [and] more severe droughts . . . – are already affecting communities, natural resources, ecosystems, economies, and public health across the Nation," and that "managing th[o]se risks requires deliberate preparation, close cooperation, and coordinated planning . . . to improve climate preparedness and resilience; help safeguard our economy, infrastructure, environment, and natural resources; and provide for the continuity of . . . agency operations, services, and programs." Exec. Order 13,653, § 1. To that end, the Order requires agencies to take various actions aimed at making "watersheds, natural resources, and ecosystems, and the communities and economies that depend on them, more resilient in the face of a changing climate." *Id.* § 3. For example, "recognizing the many benefits the Nation's natural infrastructure provides, agencies shall, where possible, focus on program and policy adjustments that promote the dual goals of greater climate resilience and carbon sequestration." *Id.* Agencies also must develop and implement adaptation plans that "evaluate the most significant climate change related risks to, and vulnerabilities in, agency operations and missions in both the short and long term, and outline actions . . . to manage these risks and vulnerabilities." *Id.* § 5(a).

The Forest Service's 2014 adaptation plan recognizes that the wide range of environmental and societal benefits provided by our national forests "are connected and sustained through the integrity of the ecosystems on these lands." *See* USDA Forest Service, *Climate Change Adaptation Plan*, page 58 (2014). The plan highlights USDA's 2010-2015 Strategic Plan Goal 2 of "[e]nsur[ing] our national forests . . . are conserved, restored, and made more resilient to climate change, while enhancing our water resources." *Id.* at 58. And consistent with section 5(a) of Executive Order 13,653, the plan identifies numerous climate change risks – including increased wildfire, invasive species, increasing water temperatures, extreme weather events, and fluctuating precipitation and temperature – that "pose challenges to sustaining forests and grasslands and the supply of goods and services upon which society depends, such as clean drinking water, forest products, outdoor recreation opportunities, and habitat." *Id.* at 60-64. With respect to transportation infrastructure specifically, the adaptation plan recognizes that, "[w]ith increasing heavy rain events, the extensive road system on NFS lands will require increased maintenance and/or modification of infrastructure (e.g. larger culverts or replacement of culverts with bridges)." *Id.* at 62.

The Forest Service's Climate Change Adaptation Plan points to a number of actions to address the risks of climate change to our forests, and in particular to forest roads. For example, the plan highlights the 2012 Planning Rule as a mechanism to ensure that "National Forest System . . . land management planning policy and procedures include consideration of climate change." *Id.* at 73. The final directives to the planning rule echo the importance of designing plan components "to sustain functional ecosystems based on a future viewpoint" and "to adapt to the effects of climate change." FSH 1909.12, ch. 20, § 23.11. The adaptation plan also points to Forest Service Manual 2020, which provides "Ecological Restoration and Resilience" directives designed "to restore and maintain resilient ecosystems that will have greater capacity to withstand stressors and recover from disturbances, especially those under changing and uncertain environmental conditions, including climate change and extreme weather events." Exhibit D at 73.

For all these reasons, the Forest Service must include the MRS as one of the alternatives in its analysis. Subpart A defines the MRS as that “needed for safe and efficient travel[;] for administration, utilization, and protection of [forest] lands[; and] to meet resource and other management objectives adopted in the relevant . . . plan.” 36 C.F.R. § 212.5(b)(1).

Temporary Roads

Under NEPA, the Forest Service has a duty to consider the effects of its proposed action when added to the existing road and trail network. *Wilderness Society v. U.S. Forest Service*, 850 F. Supp. 2d 1144, 1157-58 (D. Idaho 2012) (holding the Forest Service was arbitrary and capricious to conclude that designating 94 miles of user-created routes as non-system routes would have no significant impact).

Here, the agency is proposing to construct an alarming amount – 350 miles – of temporary roads. Temporary roads must be closed within 10 years of completion of a project, per 16 U.S.C. 1608(a), unless the Forest Service re-evaluates the road and determines it to be necessary for the minimum road system. The Forest Service must ensure that the temporary roads will in fact be temporary by including monitoring and enforcement of the projects and 10 years following completion of the projects. The most obvious way to do this would be through a thorough tracking system for the temporary roads. Therefore, we specifically request that this project incorporates a tracking system for the huge volume of temporary roads in this project so that at any time the agency and the public can see which roads were built (including date and mileage), if the roads have been reclaimed, and when they were reclaimed.

During the project and for an additional 10 years after completion of the project, the temporary roads will continue to have very real impacts on the landscape. For example, temporary roads will continue to allow for harassment of wildlife, littering, fires, invasive plant distribution, and negative impacts to aquatic and riparian habitat, as well as the fish that depend on that habitat.

The agency must consider the effects of its proposal to construct temporary roads when combined with the effects of its minimum road system. It must also consider how construction of the proposed temporary roads will detract from the purpose of subpart A of the agency’s own rules, to “identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of the National Forest System lands.” 36 C.F.R. § 212.5(b). This is especially true if the Forest Service fails to provide assurances that the proposed temporary roads will in fact be closed within 10 years of completion of the relevant project.

We request that the DEIS addresses these effects from so-called temporary roads. To address these concerns regarding temporary roads, we request an alternative that dramatically reduces the temporary road mileage and requires the temporary roads to be limited to the absolute minimum existence, with a default time-frame of 3 months barring exceptional circumstances that call for a longer timeframe. Seasonal restrictions might also be appropriate, especially in important wildlife habitat (*see* MSO section, below).

The Forest Service must seriously analyze temporary roads, as seen in the United States District Court of Montana case, *Native Ecosystems Council v. Krueger*, 946 F.Supp.2d 1060 (2013). In that case, environmental groups challenged a timber sale project posed in the Beaverhead-Deerlodge National

Forest. The thinning and restoration project was set to involve construction of a large number of temporary roads. The Forest Service, after an Environmental Assessment and Wildlife Report were completed, stated that there would be no significant impact on grizzly bears. The Forest Service based this determination on road density statistics that failed to include temporary roads. Because the Forest Service entirely “[failed] to consider an important aspect of the problem”, the case was remanded to the Forest Service to perform a new biological assessment to resolve the question of whether the Project “may affect” grizzly bears in the area.

Mexican Spotted Owl

The 4FRI Rim Country Project proposes mechanical thinning and/or prescribed fire on about 68,630 acres of Mexican spotted owl (MSO) protected activity centers (PACs) and over 128,800 acres of recovery habitat. In reference to these proposed actions, we make the following comments and considerations, all based on the 2012 MSO Recovery Plan⁸:

- We would like to see a better distinction between management actions and habitat needs in riparian habitat versus upland habitat. *See id.* at 271.
- “Ongoing climate change will result in unpredictable changes in habitat distribution and quality, and this creates considerable uncertainty in developing strategies to recover the owl. Again, this argues for preserving options where possible, as well as for attempting to account for potential changes in habitat distribution and quality.” *Id.* at 250.
- “Given our lack of experience and demonstrated expertise in purposely creating the forest structure used by owls, the recommendations for PACs focus on minimizing management.” *Id.* at 257.
- “In many cases, strategic treatments on surrounding and/or adjoining lands will reduce fire risk sufficiently so that, in the short term, treatments are not needed within PACs (Ager et al. 2007, Finney et al. 2007, Ager et al. 2010).” *Id.* at 258.
- “No mechanical or prescribed fire treatments should occur within PACs during the breeding season unless non-breeding is inferred or confirmed that year per the accepted protocol.” *Id.* at 261.
- There is reference in the scoping letter to a vague diameter limit within PACs. We request that limit be set at no more than 18 inches dbh, as per the 2102 MSO Recovery Plan at 268.
- Mechanical treatment should be limited to 20% of non-core PAC area within an EMU. *Id.* at 262.
- Seasonal restrictions should be implemented. *Id.*
- A robust monitoring program should be established. *Id.*
- Prescribed fire should be allowed to enter core areas only if it is expected to burn with low fire severity and intensity. *Id.* at 263.
- Within recovery foraging/non-breeding habitats, strive to retain trees greater than 24 inches dbh. *Id.* at 269.

⁸ U.S. Fish and Wildlife Service. 2012. Final Recovery Plan for the Mexican Spotted Owl (*Strix occidentalis lucida*), First Revision. U.S. Fish and Wildlife Service. Albuquerque, New Mexico, USA. 413 pp.

Thank you for your consideration of these scoping comments. Please keep me apprised of any developments on the 4FRI Rim Country Project.

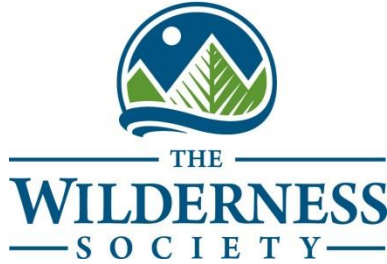
Sincerely,

A handwritten signature in black ink, appearing to read 'G. Dyson', written in a cursive style.

Greg Dyson
Public Lands Director

gdyson@wildearthguardians.org

503-730-9242



**Transportation Infrastructure and Access on National Forests and Grasslands
A Literature Review
May 2014**

Introduction

The Forest Service transportation system is very large with 374,883 miles (603,316 km) of system roads and 143,346 miles (230,693 km) of system trails. The system extends broadly across every national forest and grasslands and through a variety of habitats, ecosystems and terrains. An impressive body of scientific literature exists addressing the various effects of roads on the physical, biological and cultural environment – so much so, in the last few decades a new field of “road ecology” has emerged. In recent years, the scientific literature has expanded to address the effects of roads on climate change adaptation and conversely the effects of climate change on roads, as well as the effects of restoring lands occupied by roads on the physical, biological and cultural environments.

The following literature review summarizes the most recent thinking related to the environmental impacts of forest roads and motorized routes and ways to address them. The literature review is divided into three sections that address the environmental effects of transportation infrastructure on forests, climate change and infrastructure, and creating sustainable forest transportation systems.

- I. [Impacts of Transportation Infrastructure and Access to the Ecological Integrity of Terrestrial and Aquatic Ecosystems and Watersheds](#)
- II. [Climate Change and Transportation Infrastructure Including the Value of Roadless Areas for Climate Change Adaptation](#)
- III. [Sustainable Transportation Management in National Forests as Part of Ecological Restoration](#)

I. Impacts of Transportation Infrastructure and Access to the Ecological Integrity of Terrestrial and Aquatic Ecosystems and Watersheds

It is well understood that transportation infrastructure and access management impact aquatic and terrestrial environments at multiple scales, and, in general, the more roads and motorized routes the greater the impact. In fact, in the past 20 years or so, scientists have realized the magnitude and breadth of ecological issues related to roads; entire books have been written on the topic, e.g., Forman et al. (2003), and a new scientific field called “road ecology” has emerged. Road ecology research centers have been created including the Western

Transportation Institute at Montana State University and the Road Ecology Center at the University of California - Davis.¹

Below, we provide a summary of the current understanding on the impacts of roads and access allowed by road networks to terrestrial and aquatic ecosystems, drawing heavily on Gucinski et al. (2000). Other notable recent peer-reviewed literature reviews on roads include Trombulak and Frissell (2000), Switalski et al. (2004), Coffin (2007), Fahrig and Rytwinski (2009), and Robinson et al. (2010). Recent reviews on the impact of motorized recreation include Joslin and Youmans (1999), Gaines et al. (2003), Davenport and Switalski (2006), Ouren et al. (2007), and Switalski and Jones (2012). These peer-reviewed summaries provide additional information to help managers develop more sustainable transportation systems

Impact on geomorphology and hydrology

The construction or presence of forest roads can dramatically change the hydrology and geomorphology of a forest system leading to reductions in the quantity and quality of aquatic habitat. While there are several mechanisms that cause these impacts (Wemple et al. 2001 , Figure 1), most fundamentally, compacted roadbeds reduce rainfall infiltration, intercepting and concentrating water, and providing a ready source of sediment for transport (Wemple et al. 1996, Wemple et al. 2001). In fact, roads contribute more sediment to streams than any other land management activity (Gucinski et al. 2000). Surface erosion rates from roads are typically at least an order of magnitude greater than rates from harvested areas, and three orders of magnitude greater than erosion rates from undisturbed forest soils (Endicott 2008).

¹ See <http://www.westerntransportationinstitute.org/research/roadecology> and <http://roadecology.ucdavis.edu/>

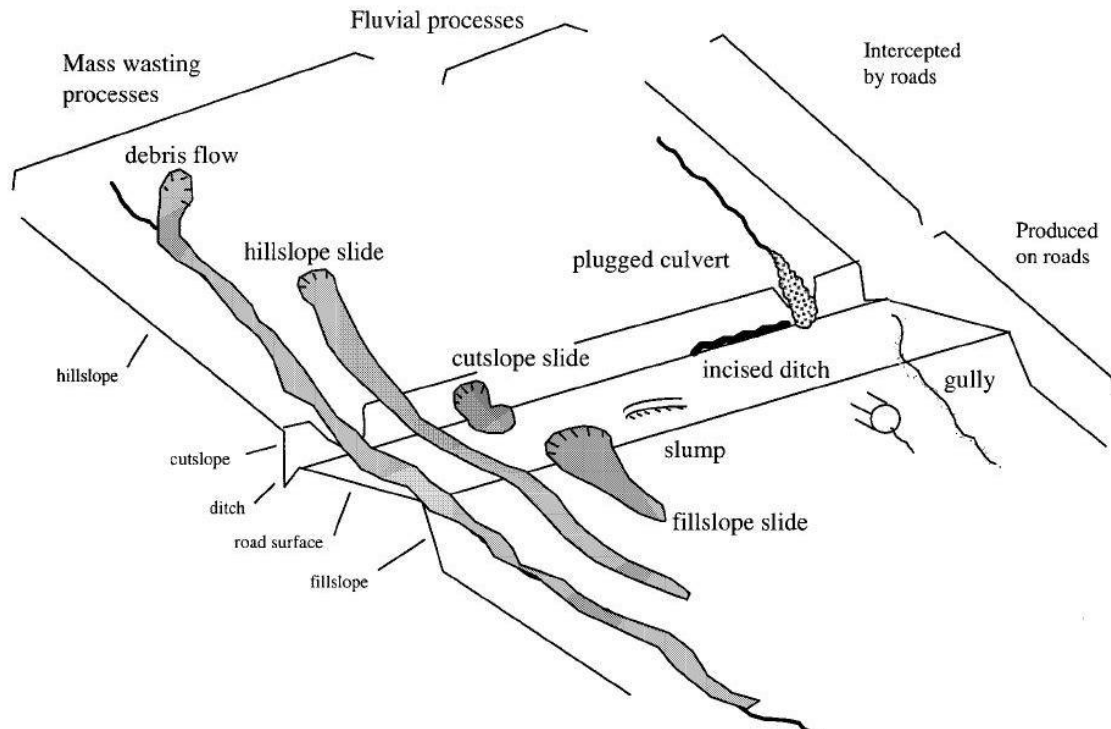


Figure 1: Typology of erosional and depositional features produced by mass-wasting and fluvial processes associate with forest roads (reprinted from Wemple et al. 2001)

Erosion of sediment from roads occurs both chronically and catastrophically. Every time it rains, sediment from the road surface and from cut- and fill-slopes is picked up by rainwater that flows into and on roads (fluvial erosion). The sediment that is entrained in surface flows are often concentrated into road ditches and culverts and directed into streams. The degree of fluvial erosion varies by geology and geography, and increases with increased motorized use (Robichaud et al. 2010). Closed roads produce less sediment, and Foltz et al. (2009) found a significant increase in erosion when closed roads were opened and driven upon. In drier landscapes, wind erosion following vehicle use can be a significant source of soil loss as well (Belnap 2003).

Roads also precipitate catastrophic failures of road beds and fills (mass wasting) during large storm events leading to massive slugs of sediment moving into waterways (Endicott 2008; Gucinski et al. 2000). This typically occurs when culverts are undersized and cannot handle the volume of water, or they simply become plugged with debris. The saturated roadbed can fail entirely and result in a landslide, or the blocked stream crossing can erode the entire fill down to the original stream channel.

The erosion of road- and trail-related sediment and its subsequent movement into stream systems affects the geomorphology of the drainage system in a number of ways. The magnitude of their effects varies by climate, geology, road age, construction / maintenance practices and storm history. It directly alters channel morphology by embedding larger gravels as well as filling pools. It can also have the opposite effect of increasing peak discharges and scouring channels, which can lead to disconnection of the channel and floodplain, and lowered base flows (Furniss et al. 1991; Joslin and Youmans 1999). The width/depth ratio of the stream changes which then

can trigger changes in water temperature, sinuosity and other geomorphic factors important for aquatic species survival (Joslin and Youmans 1999; Trombulak and Frissell 2000).

Roads also can modify flowpaths in the larger drainage network. Roads intercept subsurface flow as well as concentrate surface flow, which results in new flowpaths that otherwise would not exist, and the extension of the drainage network into previously unchanneled portions of the hillslope (Gucinski et al. 2000; Joslin and Youmans 1999). Severe aggradation of sediment at stream structures or confluences can force streams to actually go subsurface or make them too shallow for fish passage (Endicott 2008; Furniss et al. 1991).

Impacts on aquatic habitat and fish

Roads can have dramatic and lasting impacts on fish and aquatic habitat. Increased sedimentation in stream beds has been linked to decreased fry emergence, decreased juvenile densities, loss of winter carrying capacity, and increased predation of fishes, and reductions in macro-invertebrate populations that are a food source to many fish species (Rhodes et al. 1994, Joslin and Youmans 1999, Gucinski et al. 2000, Endicott 2008). On a landscape scale, these effects can add up to: changes in the frequency, timing and magnitude of disturbance to aquatic habitat and changes to aquatic habitat structures (e.g., pools, riffles, spawning gravels and in-channel debris), and conditions (food sources, refuges, and water temperature) (Gucinski et al. 2000).

Roads can also act as barriers to migration (Gucinski et al. 2000). Where roads cross streams, road engineers usually place culverts or bridges. Culverts in particular can and often interfere with sediment transport and channel processes such that the road/stream crossing becomes a barrier for fish and aquatic species movement up and down stream. For instance, a culvert may scour on the downstream side of the crossing, actually forming a waterfall up which fish cannot move. Undersized culverts and bridges can infringe upon the channel or floodplain and trap sediment causing the stream to become too shallow and/or warm such that fish will not migrate past the structure. This is problematic for many aquatic species but especially for anadromous species that must migrate upstream to spawn. Well-known native aquatic species affected by roads include Colorado River cutthroat trout (*Oncorhynchus clarki pleuriticus*), the Threatened Greenback cutthroat trout (*O. c. stomias*), and Rio Grande cutthroat trout (*O. c. virginialis*), as well as other native fishes and amphibians (Endicott 2008).

Impacts on terrestrial habitat and wildlife

Roads and trails impact wildlife through a number of mechanisms including: direct mortality (poaching, hunting/trapping) changes in movement and habitat use patterns (disturbance/avoidance), as well as indirect impacts including alteration of the adjacent habitat and interference with predatory/prey relationships (Wisdom et al. 2000, Trombulak and Frissell 2000). Some of these impacts result from the road itself, and some result from the uses on and around the roads (access). Ultimately, roads have been found to reduce the abundance and distribution of several forest species (Fayrig and Ritwinski 2009, Benítez-López et al. 2010).

Direct mortality and disturbance from road and trail use impacts many different types of species. For example, wide-ranging carnivores can be significantly impacted by a number of factors including trapping, poaching, collisions, negative human interactions, disturbance and displacement (Gaines et al. 2003). Road access has slowed the recovery of the Mexican Wolf (*Canis lupus baileyi*) with more than half of mortalities due to illegal shootings (USDI FWS 2012). Hunted game species such as elk (*Cervus canadensis*), become more vulnerable from

access allowed by roads and motorized trails resulting in a reduction in effective habitat among other impacts (Rowland et al. 2005, Switalski and Jones 2012). Slow-moving migratory animals such as amphibians, and reptiles who use roads to regulate temperature are also vulnerable (Gucinski et al. 2000, Brehme et al. 2013). Several bird species are sensitive to disturbance on roads (Barton and Holmes 2007), and several authors have identified buffer zones (Table 1, Switalski and Jones 2008, Whittington and Allen 2008).

Habitat alteration is a significant consequence of roads as well. At the landscape scale, roads fragment habitat blocks into smaller patches that may not be able to support successfully interior forest species. Smaller habitat patches also results in diminished genetic variability, increased inbreeding, and at times local extinctions (Gucinski et al. 2000; Trombulak and Frissell 2000). Motorized trails and routes can also have cascading effects throughout the ecosystem. For example, on an intensively used ORV route in Idaho, native shrubs, bunch grasses, and microbial crust were greatly reduced close to the route and replaced with non-native cheat grass (*Bromus tectorum*) and the native shrub rabbitbrush (*Chrysothamnus* spp.; Munger et al. 2003). Because of these habitat changes, fewer reptiles were found alongside the route than were found 100 m away.

Table 1. A summary of raptor nest buffer zones recommended for areas associated with human disturbance (Reprinted from Switalski and Jones 2008)

Species		Median nest buffer (m) (range in parentheses)	Reference
American kestrel	Falco sparverius	125 (50-200)	Richardson and Miller (1997)
Ferruginous hawk	Buteo regalis	300	Hamann et al. (1999)
Bald eagle	Haliaeetus leucocephalus	400	Hamann et al. (1999)
Northern goshawk	Accipiter gentilis	450 (400-500)	Jones (1979)
Sharp-shinned hawk	Accipiter striatus	450 (400-500)	Jones (1979)
Cooper's hawk	Accipiter cooperii	525 (400-500)	Richardson and Miller (1997)
Prairie falcon	Falco mexicanus	650 (50-800)	Richardson and Miller (1997)
Golden eagle	Aquila chrysaetos	800 (200-1600)	Richardson and Miller (1997)
Peregrine falcon	Falco peregrinus	800 (800-1600)	Richardson and Miller (1997)
Red-tailed hawk	Buteo jamaicensis	800	Call (1979)
Mexican spotted owl	Strix occidentalis lucida	900	US Fish and Wildlife Service (1995)
Osprey	Pandion haliaetus	1000 (400-1500)	Richardson and Miller (1997)

Roads also change the composition and structure of ecosystems along buffer zones, called edge-affected zones. The width of edge-affected zones varies by what metric is being discussed; however, researchers have documented road-avoidance zones a kilometer or more away from a road (Table 2). In heavily roaded landscapes, edge-affected acres can be a significant fraction of total acres. For example, in a landscape area where the road density is 3 mi/mi² (not an uncommon road density in national forests) and where the edge-affected zone is estimated to be 500 ft from the center of the road to each side, the edge-affected zone is 56% of the total acreage.

Table 2: A summary of some documented road-avoidance zones for various species (adapted from Robinson et al. 2010).

Species	Avoidance zone		Reference
	m (ft)	Type of disturbance	
Snakes	650 (2133)	Forestry roads	Bowles (1997)
Salamander	35 (115)	Narrow forestry road, light traffic	Semlitsch (2003)
Woodland birds	150 (492)	Unpaved roads	Ortega and Capen (2002)
Spotted owl	400 (1312)	Forestry roads, light traffic	Wasser et al. (1997)
Marten	<100 (<328)	Any forest opening	Hargis et al. (1999)
Elk	500–1000 (1640-3281)	Logging roads, light traffic	Edge and Marcum (1985)
	100–300 (328-984)	Mountain roads depending on traffic volume	Rost and Bailey (1979)
Black bear	274 (899)	Spring, unpaved roads	Kasworm and Manley (1990)
	914 (2999)	Fall, unpaved roads	

Roads and trails also affect ecosystems and habitats because they are also a major vector of non-native plant and animal species. This can have significant ecological and economic impacts when the invading species are aggressive and can overwhelm or significantly alter native species and systems. In addition, roads can increase harassment, poaching and collisions with vehicles, all of which lead to stress or mortality (Wisdom et al. 2000).

Recent reviews have synthesized the impacts of roads on animal abundance and distribution. Fahrig and Rytwinski (2009) did a complete review of the empirical literature on effects of roads and traffic on animal abundance and distribution looking at 79 studies that addressed 131 species and 30 species groups. They found that the number of documented negative effects of roads on animal abundance outnumbered the number of positive effects by a factor of 5. Amphibians, reptiles, most birds tended to show negative effects. Small mammals generally showed either positive effects or no effect, mid-sized mammals showed either negative effects or no effect, and large mammals showed predominantly negative effects. Benítez-López et al. (2010) conducted a meta-analysis on the effects of roads and infrastructure proximity on mammal and bird populations. They found a significant pattern of avoidance and a reduction in bird and mammal populations in the vicinity of infrastructure.

Road density² thresholds for fish and wildlife

It is well documented that beyond specific road density thresholds, certain species will be negatively affected, and some will be extirpated. Most studies that look into the relationship between road density and wildlife focus on the impacts to large endangered carnivores or hunted game species, although high road densities certainly affect other species – for instance, reptiles and amphibians. Gray wolves (*Canis lupus*) in the Great Lakes region and elk in Montana and Idaho have undergone the most long-term and in depth analysis. Forman and Hersperger (1996) found that in order to maintain a naturally functioning landscape with sustained populations of large mammals, road density must be below 0.6 km/km² (1.0 mi/mi²). Several studies have since substantiated their claim (Robinson et al. 2010, Table 3).

A number of studies at broad scales have also shown that higher road densities generally lead to greater impacts to aquatic habitats and fish density (Table 3). Carnefix and Frissell (2009) provide a concise review of studies that correlate cold water fish abundance and road density, and from the cited evidence concluded that “1) no truly “safe” threshold road density exists, but rather negative impacts begin to accrue and be expressed with incursion of the very first road segment; and 2) highly significant impacts (e.g., threat of extirpation of sensitive species) are already apparent at road densities on the order of 0.6 km/km² (1.0 mi/mi²) or less” (p. 1).

² We intend the term “road density” to refer to the density all roads within national forests, including system roads, closed roads, non-system roads administered by other jurisdictions (private, county, state), temporary roads and motorized trails. Please see Attachment 2 for the relevant existing scientific information supporting this approach.

Table 3: A summary of some road-density thresholds and correlations for terrestrial and aquatic species and ecosystems (reprinted from Robinson et al. 2010).

Species (Location)	Road density (mean, guideline, threshold, correlation)	Reference
Wolf (Minnesota)	0.36 km/km ² (mean road density in primary range); 0.54 km/km ² (mean road density in peripheral range)	Mech et al. (1988)
Wolf	>0.6 km/km ² (absent at this density)	Jalkotzy et al. (1997)
Wolf (Northern Great Lakes region)	>0.45 km/km ² (few packs exist above this threshold); >1.0 km/km ² (no pack exist above this threshold)	Mladenoff et al. (1995)
Wolf (Wisconsin)	0.63 km/km ² (increasing due to greater human tolerance)	Wydeven et al. (2001)
Wolf, mountain lion (Minnesota, Wisconsin, Michigan)	0.6 km/km ² (apparent threshold value for a naturally functioning landscape containing sustained populations)	Thiel (1985); van Dyke et al. (1986); Jensen et al. (1986); Mech et al. (1988); Mech (1989)
Elk (Idaho)	1.9 km/km ² (density standard for habitat effectiveness)	Woodley 2000 cited in Beazley et al. 2004
Elk (Northern US)	1.24 km/km ² (habitat effectiveness decline by at least 50%)	Lyon (1983)
Elk, bear, wolverine, lynx, and others	0.63 km/km ² (reduced habitat security and increased mortality)	Wisdom et al. (2000)
Moose (Ontario)	0.2-0.4 km/km ² (threshold for pronounced response)	Beyer et al. (2013)
Black bear (North Carolina)	>1.25 km/km ² (open roads); >0.5 km/km ² (logging roads); (interference with use of habitat)	Brody and Pelton (1989)
Black bear	0.25 km/km ² (road density should not exceed)	Jalkotzy et al. (1997)
Bobcat (Wisconsin)	1.5 km/km ² (density of all road types in home range)	Jalkotzy et al. (1997)
Large mammals	>0.6 km/km ² (apparent threshold value for a naturally functioning landscape containing sustained populations)	Forman and Hersperger (1996)
Fish populations (Medicine Bow National Forest)	(1) Positive correlation of numbers of culverts and stream crossings and amount of fine sediment in stream channels (2) Negative correlation of fish density and numbers of culverts	Eaglin and Hubert (1993) cited in Gucinski et al. (2001)
Macroinvertebrates	Species richness negatively correlated with an index of road density	McGurk and Fong (1995)
Non-anadromous salmonids (Upper Columbia River basin)	(1) Negative correlation likelihood of spawning and rearing and road density (2) Negative correlation of fish density and road density	Lee et al. (1997)

Where both stream and road densities are high, the incidence of connections between roads and streams can also be expected to be high, resulting in more common and pronounced effects of roads on streams (Gucinski et al. 2000). For example, a study on the Medicine Bow National Forest (WY) found as the number of culverts and stream crossings increased, so did the amount of sediment in stream channels (Eaglin and Hubert 1993). They also found a negative correlation with fish density and the number of culverts. Invertebrate communities can also be impacted. McGurk and Fong (1995) report a negative correlation between an index of road density with macroinvertebrate diversity.

Anderson et al. (2012) also showed that watershed conditions tend to be best in areas protected from road construction and development. Using the US Forest Service's Watershed Condition Framework assessment data, they showed that National Forest lands that are protected under the Wilderness Act, which provides the strongest safeguards, tend to have the healthiest watersheds. Watersheds in Inventoried Roadless Areas – which are protected from road building and logging by the Roadless Area Conservation Rule – tend to be less healthy than watersheds in designated Wilderness, but they are considerably healthier than watersheds in the managed landscape.

Impacts on other resources

Roads and motorized trails also play a role in affecting wildfire occurrence. Research shows that human-ignited wildfires, which account for more than 90% of fires on national lands, is almost five times more likely in areas with roads (USDA Forest Service 1996a; USDA Forest Service 1998). Furthermore, Baxter (2002) found that off-road vehicles (ORVs) can be a significant source of fire ignitions on forestlands. Roads can affect where and how forests burn and, by extension, the vegetative condition of the forest. See Attachment 1 for more information documenting the relationship between roads and wildfire occurrence.

Finally, access allowed by roads and trails can increase of ORV and motorized use in remote areas threatening archaeological and historic sites. Increased visitation has resulted in intentional and unintentional damage to many cultural sites (USDI Bureau of Land Management 2000, Schiffman 2005).

II. Climate Change and Transportation Infrastructure including the value of roadless areas for climate change adaptation

As climate change impacts grow more profound, forest managers must consider the impacts on the transportation system as well as from the transportation system. In terms of the former, changes in precipitation and hydrologic patterns will strain infrastructure at times to the breaking point resulting in damage to streams, fish habitat, and water quality as well as threats to public safety. In terms of the latter, the fragmenting effect of roads on habitat will impede the movement of species which is a fundamental element of adaptation. Through planning, forest managers can proactively address threats to infrastructure, and can actually enhance forest resilience by removing unneeded roads to create larger patches of connected habitat.

Impact of climate change and roads on transportation infrastructure

In addition to a much warmer climate, it is expected that climate change will be responsible for more extreme weather events, leading to increasing flood severity, more frequent landslides, changing hydrographs (peak, annual mean flows, etc.), and changes in erosion and

sedimentation rates and delivery processes³. Roads and trails in national forests, if designed by an engineering standard at all, were designed for storms and water flows typical of past decades, and hence may not be designed for the storms in future decades. Hence, climate driven changes may cause transportation infrastructure to malfunction or fail (ASHTO 2012, USDA Forest Service 2010). The likelihood is higher for facilities in high-risk settings—such as rain-on-snow zones, coastal areas, and landscapes with unstable geology (USDA Forest Service 2010).

Forests fragmented by roads will likely demonstrate less resistance and resilience to stressors, like those associated with climate change (Noss 2001). First, the more a forest is fragmented (and therefore the higher the edge/interior ratio), the more the forest loses its inertia characteristic, and becoming less resilient and resistant to climate change. Second, the more a forest is fragmented characterized by isolated patches, the more likely the fragmentation will interfere with the ability of species to track shifting climatic conditions over time and space. Noss (2001) predicts that weedy species with effective dispersal mechanisms might benefit from fragmentation at the expense of native species.

Modifying infrastructure to increase resilience

To prevent or reduce road failures, culvert blow-outs, and other associated hazards, forest managers will need to take a series of actions. These include replacing undersized culverts with larger ones, prioritizing maintenance and upgrades (e.g., installing drivable dips and more outflow structures), and obliterating roads that are no longer needed and pose erosion hazards (USDA Forest Service 2010, USDA Forest Service 2012a, USDA Forest Service 2011, Table 4).

Olympic National Forest has developed a number of documents oriented at oriented at protecting watershed health and species in the face of climate change, including a 2003 travel management strategy and a report entitled *Adapting to Climate Change in Olympic National Park and National Forest*. In the travel management strategy, Olympic National Forest recommended that 1/3rd of its road system be decommissioned and obliterated (USDA Forest Service 2011a). In addition, the plan called for addressing fish migration barriers in a prioritized and strategic way – most of these are associated with roads. The report calls for road decommissioning, relocation of roads away from streams, enlarging culverts as well as replacing culverts with fish-friendly crossings (USDA Forest Service 2011a, Table 4).

³ <http://www.epa.gov/climatechange/impacts-adaptation/southwest.html>

Table 4: Current and expected sensitivities of fish to climate change on the Olympic Peninsula, associated adaptation strategies and action for fisheries and fish habitat management and relevant to transportation management at Olympic National Forest and Olympic National Park (excerpt reprinted from USDA Forest Service 2011a).

Current and expected sensitivities	Adaptation strategies and actions
Changes in habitat quantity and quality	<ul style="list-style-type: none"> • Implement habitat restoration projects that focus on re-creating watershed processes and functions and that create diverse, resilient habitat.
Increase in culvert failures, fill-slope failures, stream adjacent road failures, and encroachment from stream-adjacent road segments	<ul style="list-style-type: none"> • Decommission unneeded roads. • Remove sidecast, improve drainage, and increase culvert sizing on remaining roads. • Relocate stream-adjacent roads.
Greater difficulty disconnecting roads from stream channels	<ul style="list-style-type: none"> • Design more resilient stream crossing structures.
Major changes in quantity and timing of streamflow in transitional watersheds	<ul style="list-style-type: none"> • Make road and culvert designs more conservative in transitional watersheds to accommodate expected changes.
Decrease in area of headwater streams	<ul style="list-style-type: none"> • Continue to correct culvert fish passage barriers. • Consider re-prioritizing culvert fish barrier correction projects.
Decrease in habitat quantity and connectivity for species that use headwater streams	<ul style="list-style-type: none"> • Restore habitat in degraded headwater streams that are expected to retain adequate summer streamflow (ONF).

In December 2012, the USDA Forest Service published a report entitled “Assessing the Vulnerability of Watersheds to Climate Change.” This document reinforces the concept expressed by Olympic National Forest that forest managers need to be proactive in reducing erosion potential from roads:

“Road improvements were identified as a key action to improve condition and resilience of watersheds on all the pilot Forests. In addition to treatments that reduce erosion, road improvements can reduce the delivery of runoff from road segments to channels, prevent diversion of flow during large events, and restore aquatic habitat connectivity by providing for passage of aquatic organisms. As stated previously, watershed sensitivity is determined by both inherent and management-related factors. Managers have no control over the inherent factors, so to improve resilience, efforts must be directed at anthropogenic influences such as instream flows, roads, rangeland, and vegetation management....

[Watershed Vulnerability Analysis] results can also help guide implementation of travel management planning by informing priority setting for decommissioning roads and road reconstruction/maintenance. As with the Ouachita NF example, disconnecting roads from the stream network is a key objective of such work. Similarly, WVA analysis could also help prioritize aquatic organism passage projects at road-stream crossings to allow migration by aquatic residents to suitable habitat as streamflow and temperatures change” (USDA Forest Service 2012a, p. 22-23).

Reducing fragmentation to enhance aquatic and terrestrial species adaptation

Decommissioning and upgrading roads and thus reducing the amount of fine sediment deposited on salmonid nests can increase the likelihood of egg survival and spawning success (McCaffery et al. 2007). In addition, this would reconnect stream channels and remove barriers such as culverts. Decommissioning roads in riparian areas may provide further benefits to salmon and other aquatic organisms by permitting reestablishment of streamside vegetation, which provides shade and maintains a cooler, more moderated microclimate over the stream (Battin et al. 2007).

One of the most well documented impacts of climate change on wildlife is a shift in the ranges of species (Parmesan 2006). As animals migrate, landscape connectivity will be increasingly important (Holman et al. 2005). Decommissioning roads in key wildlife corridors will improve connectivity and be an important mitigation measure to increase resiliency of wildlife to climate change. For wildlife, road decommissioning can reduce the many stressors associated with roads. Road decommissioning restores habitat by providing security and food such as grasses and fruiting shrubs for wildlife (Switalski and Nelson 2011).

Forests fragmented by roads and motorized trail networks will likely demonstrate less resistance and resilience to stressors, such as weeds. As a forest is fragmented and there is more edge habitat, Noss (2001) predicts that weedy species with effective dispersal mechanisms will increasingly benefit at the expense of native species. However, decommissioned roads when seeded with native species can reduce the spread of invasive species (Grant et al. 2011), and help restore fragmented forestlands. Off-road vehicles with large knobby tires and large undercarriages are also a key vector for weed spread (e.g., Rooney 2006). Strategically closing and decommissioning motorized routes, especially in roadless areas, will reduce the spread of weeds on forestlands (Gelbard and Harrison 2003).

Transportation infrastructure and carbon sequestration

The topic of the relationship of road restoration and carbon has only recently been explored. There is the potential for large amounts of carbon (C) to be sequestered by reclaiming roads. When roads are decompacted during reclamation, vegetation and soils can develop more rapidly and sequester large amounts of carbon. A recent study estimated total soil C storage increased 6 fold to 6.5×10^7 g C/km (to 25 cm depth) in the northwestern US compared to untreated abandoned roads (Lloyd et al. 2013). Another recent study concluded that reclaiming 425 km of logging roads over the last 30 years in Redwood National Park in Northern California resulted in net carbon savings of 49,000 Mg carbon to date (Madej et al. 2013, Table 5).

Kerekvliet et al. (2008) published a Wilderness Society briefing memo on the impact to carbon sequestration from road decommissioning. Using Forest Service estimates of the fraction of road miles that are unneeded, the authors calculated that restoring 126,000 miles of roads to a natural state would be equivalent to revegetating an area larger than Rhode Island. In addition, they calculate that the net economic benefit of road treatments are always positive and range from US\$0.925-1.444 billion.

Table 5. Carbon budget implications in road decommissioning projects (reprinted from Madej et al. 2013).

Road Decommissioning Activities and Processes	Carbon Cost	Carbon Savings
Transportation of staff to restoration sites (fuel emissions)	X	
Use of heavy equipment in excavations (fuel emissions)	X	
Cutting trees along road alignment during hillslope recontouring	X	
Excavation of road fill from stream crossings		X
Removal of road fill from unstable locations		X
Reduces risk of mass movement		X
Post-restoration channel erosion at excavation sites	X	
Natural revegetation following road decompaction		X
Replanting trees		X
Soil development following decompaction		X

Benefits of roadless areas and roadless area networks to climate change adaptation

Undeveloped natural lands provide numerous ecological benefits. They contribute to biodiversity, enhance ecosystem representation, and facilitate connectivity (Loucks et al. 2003; Crist and Wilmer 2002, Wilcove 1990, The Wilderness Society 2004, Strittholt and Dellasala 2001, DeVelice and Martin 2001), and provide high quality or undisturbed water, soil and air (Anderson et al. 2012, Dellasalla et al. 2011). They also can serve as ecological baselines to help us better understand our impacts to other landscapes, and contribute to landscape resilience to climate change.

Forest Service roadless lands, in particular, are heralded for the conservation values they provide. These are described at length in the preamble of the Roadless Area Conservation Rule (RACR)⁴ as well as in the Final Environmental Impact Statement (FEIS) for the RACR⁵, and include: high quality or undisturbed soil, water, and air; sources of public drinking water; diversity of plant and animal communities; habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land; primitive, semi-primitive non- motorized, and semi-primitive motorized classes of dispersed recreation; reference landscapes; natural appearing landscapes with high scenic quality; traditional cultural properties and sacred sites; and other locally identified unique characteristics (e.g., include uncommon geological formations, unique wetland complexes, exceptional hunting and fishing opportunities).

The Forest Service, National Park Service, and US Fish and Wildlife Service recognize that protecting and connecting roadless or lightly roaded areas is an important action agencies can take to enhance climate change adaptation. For example, the Forest Service National Roadmap for Responding to Climate Change (USDA Forest Service 2011b) establishes that increasing connectivity and reducing fragmentation are short and long term actions the Forest Service

⁴ Federal Register .Vol. 66, No. 9. January 12, 2001. Pages 3245-3247.

⁵ Final Environmental Impact Statement, Vol. 1, 3-3 to 3-7

should take to facilitate adaptation to climate change.⁶ The National Park Service also identifies connectivity as a key factor for climate change adaptation along with establishing “blocks of natural landscape large enough to be resilient to large-scale disturbances and long-term changes” and other factors. The agency states that: “The success of adaptation strategies will be enhanced by taking a broad approach that identifies connections and barriers across the landscape. Networks of protected areas within a larger mixed landscape can provide the highest level of resilience to climate change.”⁷ Similarly, the National Fish, Wildlife and Plants Climate Adaptation Partnership’s Adaptation Strategy (2012) calls for creating an ecologically-connected network of conservation areas.⁸

Roadless lands also are responsible for higher quality water and watersheds. Anderson et al. (2012) assessed the relationship of watershed condition and land management status and found a strong spatial association between watershed health and protective designations. Dellasalla et al. (2011) found that undeveloped and roadless watersheds are important for supplying downstream users with high-quality drinking water, and developing these watersheds comes at significant costs associated with declining water quality and availability. The authors recommend a light-touch ecological footprint to sustain the many values that derive from roadless areas including healthy watersheds.

⁶ Forest Service, 2011. *National Roadmap for Responding to Climate Change*. US Department of Agriculture. FS-957b. Page 26.

⁷ National Park Service. *Climate Change Response Program Brief*. <http://www.nature.nps.gov/climatechange/adaptationplanning.cfm>. Also see: National Park Service, 2010. *Climate Change Response Strategy*. http://www.nature.nps.gov/climatechange/docs/NPS_CCRS.pdf. Objective 6.3 is to “Collaborate to develop cross-jurisdictional conservation plans to protect and restore connectivity and other landscape-scale components of resilience.”

⁸ See <http://www.wildlifeadaptationstrategy.gov/pdf/NFWPCAS-Chapter-3.pdf>. Pages 55- 59. The first goal and related strategies are:

Goal 1: Conserve habitat to support healthy fish, wildlife, and plant populations and ecosystem functions in a changing climate.

Strategy 1.1: identify areas for an ecologically-connected network of terrestrial, freshwater, coastal, and marine conservation areas that are likely to be resilient to climate change and to support a broad range of fish, wildlife, and plants under changed conditions.

Strategy 1.2: Secure appropriate conservation status on areas identified in Strategy 1.1 to complete an ecologically-connected network of public and private conservation areas that will be resilient to climate change and support a broad range of species under changed conditions.

Strategy 1.4: Conserve, restore, and as appropriate and practicable, establish new ecological connections among conservation areas to facilitate fish, wildlife, and plant migration, range shifts, and other transitions caused by climate change.

III. Sustainable Transportation Management in National Forests as Part of Ecological Restoration

At 375,000 miles strong, the Forest Service road system is one of the largest in the world – it is eight times the size of the National Highway System. It is also indisputably unsustainable – that is, roads are not designed, located, or maintained according to best management practices, and environmental impacts are not minimized. It is largely recognized that forest roads, especially unpaved ones, are a primary source of sediment pollution to surface waters (Endicott 2008, Gucinski et al. 2000), and that the system has about 1/3rd more miles than it needs (USDA Forest Service 2001). In addition, the majority of the roads were constructed decades ago when road design and management techniques did not meet current standards (Gucinski et al. 2000, Endicott 2008), making them more vulnerable to erosion and decay than if they had been designed today. Road densities in national forests often exceed accepted thresholds for wildlife.

Only a small portion of the road system is regularly used. All but 18% of the road system is inaccessible to passenger vehicles. Fifty-five percent of the roads are accessible only by high clearance vehicles and 27% are closed. The 18% that is accessible to cars is used for about 80% of the trips made within National Forests.⁹ Most of the road maintenance funding is directed to the passenger car roads, while the remaining roads suffer from neglect. As a result, the Forest Service currently has a \$3.7 billion road maintenance backlog that grows every year. In other words, only about 1/5th of the roads in the national forest system are used most of the time, and the fraction that is used often is the best designed and maintained because they are higher level access roads. The remaining roads sit generally unneeded and under-maintained – arguably a growing ecological and fiscal liability.

Current Forest Service management direction is to identify and implement a sustainable transportation system.¹⁰ The challenge for forest managers is figuring out what is a sustainable road system and how to achieve it – a challenge that is exacerbated by climate change. It is reasonable to define a sustainable transportation system as one where all the routes are constructed, located, and maintained with best management practices, and social and environmental impacts are minimized. This, of course, is easier said than done, since the reality is that even the best roads and trail networks can be problematic simply because they exist and usher in land uses that without the access would not occur (Trombulak and Frissell 2000, Carnefix and Frissell 2009, USDA Forest Service 1996b), and when they are not maintained to the designed level they result in environmental problems (Endicott 2008; Gucinski et al. 2000). Moreover, what was sustainable may no longer be sustainable under climate change since roads designed to meet older climate criteria may no longer hold up under new climate scenarios (USDA Forest Service 2010, USDA Forest Service 2011b, USDA Forest Service 2012a, AASHTO 2012).

Forest Service efforts to move toward a more sustainable transportation system

The Forest Service has made efforts to make its transportation system more sustainable, but still has considerable work to do. In 2001, the Forest Service tried to address the issue by

⁹ USDA Forest Service. Road Management Website Q&As. Available online at http://www.fs.fed.us/eng/road_mgt/qanda.shtml.

¹⁰ See Forest Service directive memo dated March 29, 2012 entitled “Travel Management, Implementation of 36 CFR, Part 202, Subpart A (36 CFR 212.5(b))”

promulgating the Roads Rule¹¹ with the purpose of working toward a sustainable road system (USDA 2001). The Rule directed every national forest to identify a minimum necessary road system and identify unneeded roads for decommissioning. To do this, the Forest Service developed the Roads Analysis Process (RAP), and published Gucinski et al. (2000) to provide the scientific foundation to complement the RAP. In describing the RAP, Gucinski et al. (2000) writes:

“Roads Analysis is intended to be an integrated, ecological, social, and economic approach to transportation planning. It uses a multiscale approach to ensure that the identified issues are examined in context. Roads Analysis is to be based on science. Analysts are expected to locate, correctly interpret, and use relevant existing scientific literature in the analysis, disclose any assumptions made during the analysis, and reveal the limitations of the information on which the analysis is based. The analysis methods and the report are to be subjected to critical technical review” (p. 10).

Most national forests have completed RAPs, although most only looked at passenger vehicle roads which account for less than 20% of the system’s miles. The Forest Service Washington Office in 2010 directed that forests complete a Travel Analysis Process (TAP) by the end of fiscal year 2015, which must address all roads and create a map and list of roads identifying which are likely needed and which are not. Completed TAPs will provide a blueprint for future road decommissioning and management, they will not constitute compliance with the Roads Rule, which clearly requires the identification of the minimum roads system and roads for decommissioning. Almost all forests have yet to comply with subpart A.

The Forest Service in 2005 then tried to address the off-road portion of this issue by promulgating subpart B of the Travel Management Rule,¹² with the purpose of curbing the most serious impacts associated with off-road vehicle use. Without a doubt, securing summer-time travel management plans was an important step to curbing the worst damage. However, much work remains to be done to approach sustainability, especially since many national forests used the travel management planning process to simply freeze the footprint of motorized routes, and did not try to re-design the system to make it more ecologically or socially sustainable. Adams and McCool (2009) considered this question of how to achieve sustainable motorized recreation and concluded that:

As the agencies move to revise [off-road vehicle] allocations, they need to clearly define how they intend to locate routes so as to minimize impacts to natural resources and other recreationists in accordance with Executive Order 11644....¹³

¹¹ 36 CFR 215 subpart A

¹² 36 CFR 212 subpart B

¹³ Recent court decisions have made it clear that the minimization requirements in the Executive Orders are not discretionary and that the Executive Orders are enforceable. See

- *Idaho Conservation League v. Guzman*, 766 F. Supp. 2d 1056 (D. Idaho 2011) (Salmon-Challis National Forest TMP).
- *The Wilderness Society v. U.S. Forest Service*, CV 08-363 (D. Idaho 2012) (Sawtooth-Minidoka district National Forest TMP).
- *Central Sierra Environmental Resource Center v. US Forest Service*, CV 10-2172 (E.D. CA 2012) (Stanislaus National Forest TMP).

...As they proceed with designation, the FS and BLM need to acknowledge that current allocations are the product of agency failure to act, not design. Ideally, ORV routes would be allocated as if the map were currently empty of ORV routes. Reliance on the current baseline will encourage inefficient allocations that likely disproportionately impact natural resources and non-motorized recreationists. While acknowledging existing use, the agencies need to do their best to imagine the best possible arrangement of ORV routes, rather than simply tinkering around the edges of the current allocations.¹⁴

The Forest Service only now is contemplating addressing the winter portion of the issue, forced by a lawsuit challenging the Forest Service's inadequate management of snowmobiles. The agency is expected to issue a third rule in the fall of 2014 that will trigger winter travel management planning.

Strategies for identifying a minimum road system and prioritizing restoration

Transportation Management plays an integral role in the restoration of Forestlands. Reclaiming and obliterating roads is key to developing a sustainable transportation system. Numerous authors have suggested removing roads 1) to restore water quality and aquatic habitats (Gucinski et al. 2000), and 2) to improve habitat security and restore terrestrial habitat (e.g., USDI USFWS 1993, Hebblewhite et al. 2009).

Creating a minimum road system through road removal will increase connectivity and decrease fragmentation across the entire forest system. However, at a landscape scale, certain roads and road segments pose greater risks to terrestrial and aquatic integrity than others. Hence, restoration strategies must focus on identifying and removing/mitigating the higher risk roads. Additionally, areas with the highest ecological values, such as being adjacent to a roadless area, may also be prioritized for restoration efforts. Several methods have been developed to help prioritize road reclamation efforts including GIS-based tools and best management practices (BMPs). It is our hope that even with limited resources, restoration efforts can be prioritized and a more sustainable transportation system created.

GIS-based tools

Girvetz and Shilling (2003) developed a novel and inexpensive way to analyze environmental impacts from road systems using the Ecosystem Management Decision Support program (EMDS). EMDS was originally developed by the United States Forest Service, as a GIS-based decision support tool to conduct ecological analysis and planning (Reynolds 1999). Working in conjunction with Tahoe National Forest managers, Girvetz and Shilling (2003) used spatial data on a number of aquatic and terrestrial variables and modeled the impact of the forest's road network. The network analysis showed that out of 8233 km of road analyzed, only 3483 km (42%) was needed to ensure current and future access to key points. They found that the modified network had improved patch characteristics, such as significantly fewer "cherry stem" roads intruding into patches, and larger roadlessness.

Shilling et al. (2012) later developed a recreational route optimization model using a similar methodology and with the goal of identifying a sustainable motorized transportation system for the Tahoe National Forest (Figure 2). Again using a variety of environmental factors, the model identified routes with high recreational benefits, lower conflict, lower maintenance and

¹⁴ Page 105.

management requirements, and lower potential for environmental impact operating under the presumption that such routes would be more sustainable and preferable in the long term. The authors combined the impact and benefit analyses into a recreation system analysis “that was effectively a cost-benefit accounting, consistent with requirements of both the federal Travel Management Rule (TMR) and the National Environmental Policy Act” (p. 392).

The Wilderness Society in 2012 also developed a GIS decision support tool called “RoadRight” that identifies high risk road segments to a variety of forest resources including water, wildlife, and roadlessness (The Wilderness Society 2012, The Wilderness Society 2013). The GIS system is designed to provide information that will help forest planners identify and minimize road related environmental risks. See the summary of and user guide for RoadRight that provides more information including where to access the open source software.

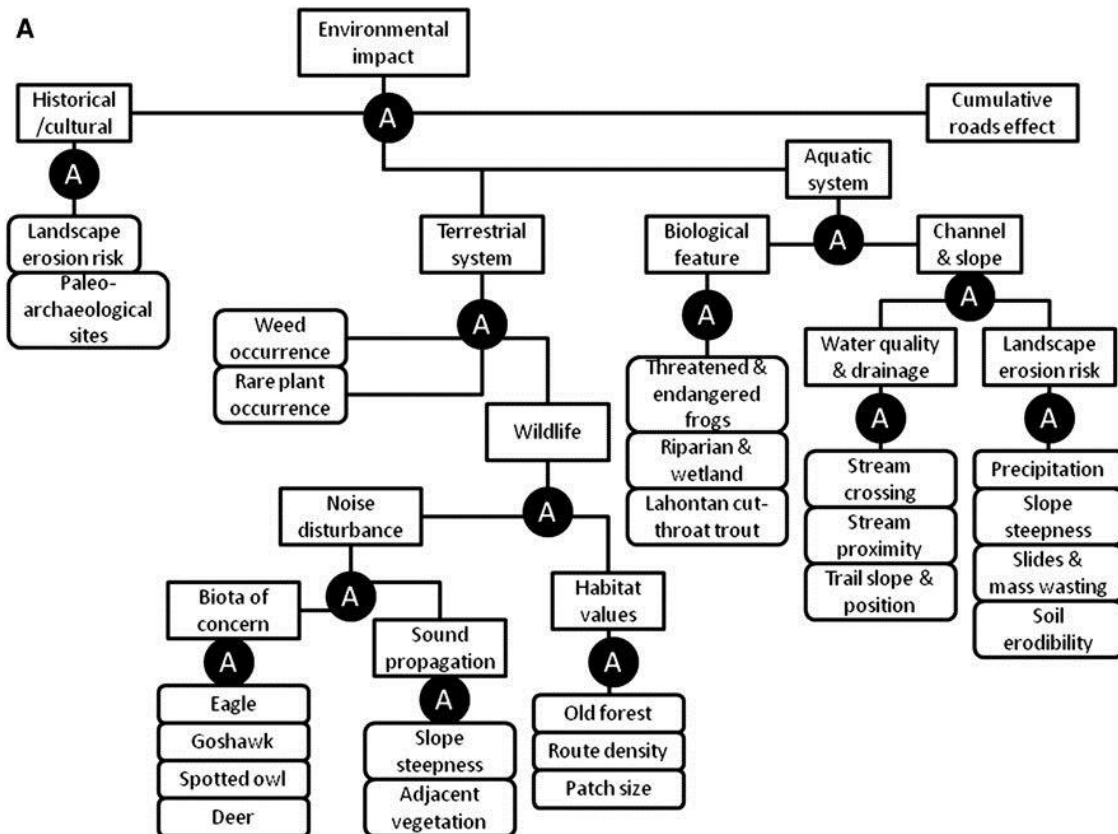


Figure 2: A knowledge base of contributions of various environmental conditions to the concept “environmental impact” [of motorized trails]. Rectangles indicate concepts, circles indicate Boolean logic operators, and rounded rectangles indicate sources of environmental data. (Reprinted from Shilling et al. 2012)

Best management practices (BMPs)

BMPs have also been developed to help create more sustainable transportation systems and identify restoration opportunities. BMPs provide science-based criteria and standards that land managers follow in making and implementing decisions about human uses and projects that affect natural resources. Several states have developed BMPs for road construction, maintenance and decommissioning practices (e.g., Logan 2001, Merrill and Cassaday 2003, USDA Forest Service 2012b).

Recently, BMPs have been developed for addressing motorized recreation. Switalski and Jones (2012) published, *“Off-Road Vehicle Best Management Practices for Forestlands: A Review of Scientific Literature and Guidance for Managers.”* This document reviews the current literature on the environmental and social impacts of off-road vehicles (ORVs), and establishes a set of Best Management Practices (BMPs) for the planning and management of ORV routes on forestlands. The BMPs were designed to be used by land managers on all forestlands, and is consistent with current forest management policy and regulations. They give guidance to transportation planners on where how to place ORV routes in areas where they will reduce use conflicts and cause as little harm to the environment as possible. These BMPs also help guide managers on how to best remove and restore routes that are redundant or where there is an unacceptable environmental or social cost.

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Attachments

Attachment 1: Wildfire and Roads Fact Sheet

Attachment 2: Using Road Density as a Metric for Ecological Health in National Forests: What Roads and Routes should be Included? Summary of Scientific Information



Photo: Lou Anegli Digital

Roaded Forests Are at a Greater Risk of Experiencing Wildfires than Unroaded Forests

- A wildland fire ignition is almost twice as likely to occur in a roaded area than in a roadless area. (USDA 2000, Table 3-18)
- The location of large wildfires is often correlated with proximity to busy roads. (Sierra Nevada Ecosystem Project, 1996)
- High road density increases the probability of fire occurrence due to human-caused ignitions. (Hann, W.J., et al. 1997)
- Unroaded areas have lower potential for high-intensity fires than roaded areas because they are less prone to human-caused ignitions. (DellaSala, et al. 1995)
- The median size of large fires on national forests is greater outside of roadless areas. (USDA 2000, Table 3-22)
- A positive correlation exists between lightning fire frequency and road density due to increased availability of flammable fine fuels near roads. (Arienti, M. Cecilia, et al. 2009)
- Human caused wildfires are strongly associated with access to natural landscapes, with the proximity to urban areas and roads being the most important factor (Romero-Calcerrada, et al. 2008)

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HUMAN ACTIVITY AND WILDFIRE

- Sparks from cars, off-road vehicles, and neglected campfires caused nearly 50,000 wildfire ignitions in 2000. (USDA 2000, Fuel Management and Fire Suppression Specialist Report, Table 4.)
- More than 90% of fires on national lands are caused by humans (USDA 1996 and 1998)
- Human-ignited wildfire is almost 5 times more likely to occur in a roaded area than in a roadless area (USDA 2000, Table 3-19).

There are 375,000 miles of roads in our national forests.



Photo: USDA Forest Service, Coconino National Forest

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**Attachment 2: Using Road Density as a Metric for Ecological Health in National Forests:
What Roads and Routes should be Included?**

Summary of Scientific Information

Last Updated: November 22, 2012

I. Density analysis should include closed roads, non-system roads administered by other jurisdictions (private, county, state), temporary roads and motorized trails.

Typically, the Forest Service has calculated road density by looking only at open system road density. From an ecological standpoint, this approach may be flawed since it leaves out of the density calculations a significant percent of the total motorized routes on the landscape. For instance, the motorized route system in the entire National Forest System measures well over 549,000 miles.¹ By our calculation, a density analysis limited to open system roads would consider less than 260,000 miles of road, which accounts for less than half of the entire motorized transportation system estimated to exist on our national forests.² These additional roads and motorized trails impact fish, wildlife, and water quality, just as open system roads do. In this section, we provide justification for why a road density analysis used for the purposes of assessing ecological health and the effects of proposed alternatives in a planning document should include closed system roads, non-system roads administered by other jurisdictions, temporary roads, and motorized trails.

Impacts of closed roads

It is crucial to distinguish the density of roads physically present on the landscape, whether closed to vehicle use or not, from “open-road density” (Pacific Rivers Council, 2010). An open-road density of 1.5 mi/mi² has been established as a standard in some national forests as protective of some terrestrial wildlife species. However, many areas with an open road density of 1.5 mi/mi² have a much higher inventoried or extant hydrologically effective road density, which may be several-fold as high with significant aquatic impacts. This higher density occurs because many road “closures” block vehicle

¹ The National Forest System has about 372,000 miles of system roads. The forest service also has an estimated 47,000 miles of motorized trails. As of 1998, there were approximately 130,000 miles of non-system roads in our forests. Non-system roads include public roads such as state, county, and local jurisdiction and private roads. (USFS, 1998) The Forest Service does not track temporary roads but is reasonable to assume that there are likely several thousand miles located on National Forest System lands.

² About 30% of system roads, or 116,108 miles, are in Maintenance Level 1 status, meaning they are closed to all motorized use. (372,000 miles of NFS roads - 116,108 miles of ML 1 roads = 255,892). This number is likely conservative given that thousands of more miles of system roads are closed to public motorized use but categorized in other Maintenance Levels.

access, but do nothing to mitigate the hydrologic alterations that the road causes. The problem is further compounded in many places by the existence of “ghost” roads that are not captured in agency inventories, but that are nevertheless physically present and causing hydrologic alteration (Pacific Watershed Associates, 2005).

Closing a road to public motorized use can mitigate the impacts on water, wildlife, and soils only if proper closure and storage technique is followed. Flow diversions, sediment runoff, and illegal incursions will continue unabated if necessary measures are not taken. The Forest Service’s National Best Management Practices for non-point source pollution recommends the following management techniques for minimizing the aquatic impacts from closed system roads: eliminate flow diversion onto the road surface, reshape the channel and streambanks at the crossing-site to pass expected flows without scouring or ponding, maintain continuation of channel dimensions and longitudinal profile through the crossing site, and remove culverts, fill material, and other structures that present a risk of failure or diversion. Despite good intentions, it is unlikely given our current fiscal situation and past history that the Forest Service is able to apply best management practices to all stored roads,³ and that these roads continue to have impacts. This reality argues for assuming that roads closed to the public continue to have some level of impact on water quality, and therefore, should be included in road density calculations.

As noted above, many species benefit when roads are closed to public use. However, the fact remains that closed system roads are often breached resulting in impacts to wildlife. Research shows that a significant portion of off-road vehicle (ORV) users violates rules even when they know what they are (Lewis, M.S., and R. Paige, 2006; Frueh, LM, 2001; Fischer, A.L., et. al, 2002; USFWS, 2007.). For instance, the Rio Grande National Forest’s Roads Analysis Report notes that a common travel management violation occurs when people drive around road closures on Level 1 roads (USDA Forest Service, 1994). Similarly, in a recent legal decision from the Utah District Court , *Sierra Club v. USFS*, Case No. 1:09-cv-131 CW (D. Utah March 7, 2012), the court found that, as part of analyzing alternatives in a proposed travel management plan, the Forest Service failed to take a hard look at the impact of continued illegal use. In part, the court based its decision on the Forest Service’s acknowledgement that illegal motorized use is a significant problem and that the mere presence of roads is likely to result in illegal use.

In addition to the disturbance to wildlife from ORVs, incursions and the accompanying human access can also result in illegal hunting and trapping of animals. The Tongass National Forest refers to this in its EIS to amend the Land and Resources Management Plan. Specifically, the Forest Service notes in the EIS that Alexander Archipelego wolf mortality due to legal and illegal hunting and trapping is related not only to roads open to motorized access, but to all roads, and that *total road densities* of 0.7-1.0 mi/mi² or less may be necessary (USDA Forest Service, 2008).

As described below, a number of scientific studies have found that ORV use on roads and trails can have serious impacts on water, soil and wildlife resources. It should be expected that ORV use will continue to

³ The Forest Service generally reports that it can maintain 20-30% of its open road system to standard.

some degree to occur illegally on closed routes and that this use will affect forest resources. Given this, roads closed to the general public should be considered in the density analysis.

Impacts of non-system roads administered by other jurisdictions (private, county, state)

As of 1998, there were approximately 130,000 miles of non-system roads in national forests (USDA Forest Service, 1998). These roads contribute to the environmental impacts of the transportation system on forest resources, just as forest system roads do. Because the purpose of a road density analysis is to measure the impacts of roads at a landscape level, the Forest Service should include all roads, including non-system, when measuring impacts on water and wildlife. An all-inclusive analysis will provide a more accurate representation of the environmental impacts of the road network within the analysis area.

Impacts of temporary roads

Temporary roads are not considered system roads. Most often they are constructed in conjunction with timber sales. Temporary roads have the same types environmental impacts as system roads, although at times the impacts can be worse if the road persists on the landscape because they are not built to last.

It is important to note that although they are termed temporary roads, their impacts are not temporary. According to Forest Service Manual (FSM) 7703.1, the agency is required to "Reestablish vegetative cover on any unnecessary roadway or area disturbed by road construction on National Forest System lands within 10 years after the termination of the activity that required its use and construction." Regardless of the FSM 10-year rule, temporary roads can remain for much longer. For example, timber sales typically last 3-5 years or more. If a temporary road is built in the first year of a six year timber sale, its intended use does not end until the sale is complete. The timber contract often requires the purchaser to close and obliterate the road a few years after the Forest Service completes revegetation work. The temporary road, therefore, could remain open 8-9 years before the ten year clock starts ticking per the FSM. Therefore, temporary roads can legally remain on the ground for up to 20 years or more, yet they are constructed with less environmental safeguards than modern system roads.

Impacts of motorized trails

Scientific research and agency publications generally do not decipher between the impacts from motorized trails and roads, often collapsing the assessment of impacts from unmanaged ORV use with those of the designated system of roads and trails. The following section summarizes potential impacts resulting from roads and motorized trails and the ORV use that occurs on them.

Aquatic Resources

While driving on roads has long been identified as a major contributor to stream sedimentation (for review, see Gucinski, 2001), recent studies have identified ORV routes as a significant cause of stream sedimentation as well (Sack and da Luz, 2004; Chin et al.; 2004, Ayala et al.; 2005, Welsh et al.; 2006). It has been demonstrated that sediment loss increases with increased ORV traffic (Foltz, 2006). A study by

Sack and da Luz (2004) found that ORV use resulted in a loss of more than 200 pounds of soil off of every 100 feet of trail each year. Another study (Welsh et al., 2006) found that ORV trails produced five times more sediment than unpaved roads. Chin et al. (2004) found that watersheds with ORV use as opposed to those without exhibited higher percentages of channel sands and fines, lower depths, and lower volume – all characteristics of degraded stream habitat.

*Soil Resources*⁴

Ouren, et al. (2007), in an extensive literature review, suggests ORV use causes soil compaction and accelerated erosion rates, and may cause compaction with very few passes. Weighing several hundred pounds, ORVs can compress and compact soil (Nakata et al., 1976; Snyder et al., 1976; Vollmer et al., 1976; Wilshire and Nakata, 1976), reducing its ability to absorb and retain water (Dregne, 1983), and decreasing soil fertility by harming the microscopic organisms that would otherwise break down the soil and produce nutrients important for plant growth (Wilshire et al., 1977). An increase in compaction decreases soil permeability, resulting in increased flow of water across the ground and reduced absorption of water into the soil. This increase in surface flow concentrates water and increases erosion of soils (Wilshire, 1980; Webb, 1983; Misak et al., 2002).

Erosion of soil is accelerated in ORV-use areas directly by the vehicles, and indirectly by increased runoff of precipitation and the creation of conditions favorable to wind erosion (Wilshire, 1980). Knobby and cup-shaped protrusions from ORV tires that aid the vehicles in traversing steep slopes are responsible for major direct erosional losses of soil. As the tire protrusions dig into the soil, forces far exceeding the strength of the soil are exerted to allow the vehicles to climb slopes. The result is that the soil and small plants are thrown downslope in a “rooster tail” behind the vehicle. This is known as mechanical erosion, which on steep slopes (about 15° or more) with soft soils may erode as much as 40 tons/mi (Wilshire, 1992). The rates of erosion measured on ORV trails on moderate slopes exceed natural rates by factors of 10 to 20 (Iverson et al., 1981; Hinckley et al., 1983), whereas use on steep slopes has commonly removed the entire soil mantle exposing bedrock. Measured erosional losses in high use ORV areas range from 1.4-242 lbs/ft² (Wilshire et al., 1978) and 102-614 lbs/ft² (Webb et al., 1978). A more recent study by Sack and da Luz (2003) found that ORV use resulted in a loss of more than 200 lbs of soil off of every 100 feet of trail each year.

Furthermore, the destruction of cryptobiotic soils by ORVs can reduce nitrogen fixation by cyanobacteria, and set the nitrogen economy of nitrogen-limited arid ecosystems back decades. Even small reductions in crust can lead to diminished productivity and health of the associated plant community, with cascading effects on plant consumers (Davidson et al., 1996). In general, the deleterious effects of ORV use on cryptobiotic crusts is not easily repaired or regenerated. The recovery time for the lichen component of crusts has been estimated at about 45 years (Belnap, 1993). After this time the crusts may appear to have regenerated to the untrained eye. However, careful observation will reveal that the 45 year-old crusts will not have recovered their moss component, which will take an additional 200 years to fully come back (Belnap and Gillette, 1997).

⁴ For a full review see Switalski, T. A. and A. Jones (2012).

*Wildlife Resources*⁵

Studies have shown a variety of possible wildlife disturbance vectors from ORVs. While these impacts are difficult to measure, repeated harassment of wildlife can result in increased energy expenditure and reduced reproduction. Noise and disturbance from ORVs can result in a range of impacts including increased stress (Nash et al., 1970; Millspaugh et al., 2001), loss of hearing (Brattstrom and Bondello, 1979), altered movement patterns (e.g., Wisdom et al. 2004; Preisler et al. 2006), avoidance of high-use areas or routes (Janis and Clark 2002; Wisdom 2007), and disrupted nesting activities (e.g., Strauss 1990).

Wisdom et al. (2004) found that elk moved when ORVs passed within 2,000 yards but tolerated hikers within 500 ft. Wisdom (2007) reported preliminary results suggesting that ORVs are causing a shift in the spatial distribution of elk that could increase energy expenditures and decrease foraging opportunities for the herd. Elk have been found to readily avoid and be displaced from roaded areas (Irwin and Peek, 1979; Hershey and Leege, 1982; Millspaugh, 1995). Additional concomitant effects can occur, such as major declines in survival of elk calves due to repeated displacement of elk during the calving season (Phillips, 1998). Alternatively, closing or decommissioning roads has been found to decrease elk disturbance (Millspaugh et al., 2000; Rowland et al., 2005).

Disruption of breeding and nesting birds is particularly well-documented. Several species are sensitive to human disturbance with the potential disruption of courtship activities, over-exposure of eggs or young birds to weather, and premature fledging of juveniles (Hamann et al., 1999). Repeated disturbance can eventually lead to nest abandonment. These short-term disturbances can lead to long-term bird community changes (Anderson et al., 1990). However when road densities decrease, there is an observable benefit. For example, on the Loa Ranger District of the Fishlake National Forest in southern Utah, successful goshawk nests occur in areas where the localized road density is at or below 2-3 mi/mi² (USDA, 2005).

Examples of Forest Service planning documents that use total motorized route density or a variant

Below, we offer examples of where total motorized route density or a variant has been used by the Forest Service in planning documents.

- The Mt. Taylor RD of the Cibola NF analyzed open and closed system roads and motorized trails together in a single motorized *route* density analysis. Cibola NF: Mt. Taylor RD Environmental Assessment for Travel Management Planning, Ch.3, p 55.
http://prdp2fs.ess.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5282504.pdf.
- The Grizzly Bear Record of Decision (ROD) for the Forest Plan Amendments for Motorized Access

⁵ For a full review see: Switalski, T. A. and A. Jones (2012).

Management within the Selkirk and Cabinet-Yaak Grizzly Bear Recovery Zones (Kootenai, Lolo, and Idaho Panhandle National Forests) assigned route densities for the designated recovery zones. One of the three densities was for Total Motorized Route Density (TMRD) which includes open roads, restricted roads, roads not meeting all reclaimed criteria, and open motorized trails. The agency's decision to use TMRD was based on the Endangered Species Act's requirement to use best available science, and monitoring showed that both open and closed roads and motorized trails were impacting grizzly. Grizzly Bear Plan Amendment ROD. Online at cache.ecosystem-management.org/48536_FSPLT1_009720.pdf.

- The Chequamegon-Nicolet National Forest set forest-wide goals in its forest plan for both open road density and total road density to improve water quality and wildlife habitat.

I decided to continue reducing the amount of total roads and the amount of open road to resolve conflict with quieter forms of recreation, impacts on streams, and effects on some wildlife species. ROD, p 13.

Chequamegon-Nicolet National Forest Land and Resource Management Plan Record of Decision. Online at http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5117609.pdf.

- The Tongass National Forest's EIS to amend the forest plan notes that Alexander Archipelago wolf mortality due to legal and illegal hunting and trapping is related not only to roads open to motorized access, but to all roads, and that *total road densities* of 0.7-1.0 mi/mi² or less may be necessary.

Another concern in some areas is the potentially unsustainable level of hunting and trapping of wolves, when both legal and illegal harvest is considered. The 1997 Forest Plan EIS acknowledged that open road access contributes to excessive mortality by facilitating access for hunters and trappers. Landscapes with open-road densities of 0.7 to 1.0 mile of road per square mile were identified as places where human-induced mortality may pose risks to wolf conservation. The amended Forest Plan requires participation in cooperative interagency monitoring and analysis to identify areas where wolf mortality is excessive, determine whether the mortality is unsustainable, and identify the probable causes of the excessive mortality.

More recent information indicates that wolf mortality is related not only to roads open to motorized access, but to all roads, because hunters and trappers use all roads to access wolf habitat, by vehicle or on foot. Consequently, this decision amends the pertinent standard and guideline contained in Alternative 6 as displayed in the Final EIS in areas where road access and associated human caused mortality has been determined to be the significant contributing factor to unsustainable wolf mortality. The standard and guideline has been modified to ensure that a range of options to reduce mortality risk will be considered in these areas, and to specify that total road densities of 0.7 to 1.0 mile per square mile or less may be necessary. ROD, p 24.

Tongass National Forest Amendment to the Land and Resource Management Plan Record of Decision and Final EIS. January 2008. http://tongass-fpadjust.net/Documents/Record_of_Decision.pdf

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