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The Environmental Consequences of Forest Roads and Achieving a Sustainable Road System

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Table of Contents

TABLE OF CONTENTS 2

INTRODUCTION 3

**I. IMPACTS OF TRANSPORTATION INFRASTRUCTURE AND ACCESS TO THE
ECOLOGICAL INTEGRITY OF TERRESTRIAL AND AQUATIC ECOSYSTEMS AND
WATERSHEDS 3**

- A. IMPACTS ON GEOMORPHOLOGY AND HYDROLOGY4
- B. IMPACTS ON AQUATIC HABITAT AND FISH5
- C. IMPACTS ON TERRESTRIAL HABITAT AND WILDLIFE6
- D. ROAD DENSITY THRESHOLDS FOR FISH AND WILDLIFE9
- E. ROADS AND FIRES..... 11

II. CLIMATE CHANGE AND TRANSPORTATION INFRASTRUCTURE 12

- A. CLIMATE CHANGE, FOREST ROADS, AND FRAGMENTED HABITAT 12
- B. MODIFYING INFRASTRUCTURE TO INCREASE RESILIENCE..... 14
- C. REDUCING FRAGMENTATION TO ENHANCE AQUATIC AND TERRESTRIAL SPECIES ADAPTATION..... 16
- D. TRANSPORTATION INFRASTRUCTURE AND CARBON SEQUESTRATION..... 17
- E. BENEFITS OF ROADLESS AREAS AND INTACT MATURE FORESTS FOR CLIMATE CHANGE ADAPTATION..... 18

**III. ACHIEVING A SUSTAINABLE MINIMUM ROAD SYSTEM ON NATIONAL FOREST
LANDS 20**

- A. BACKGROUND..... 20
- B. USING REAL ROAD AND MOTORIZED TRAIL DENSITIES TO IDENTIFY A MINIMUM ROAD SYSTEM..... 22
- C. USING BEST MANAGEMENT PRACTICES TO ACHIEVE A SUSTAINABLE ROAD SYSTEM 25
- D. EFFECTIVENESS OF ROAD DECOMMISSIONING TREATMENTS..... 27

CONCLUSION 29

REFERENCES 31

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Cover photos credits: WildEarth Guardians. Left: road failure, Mt. Baker-Snoqualmie National Forest, 2016. Right top: bull elk, Kootenai National Forest, 2011. Right bottom: black bear, Gallatin National Forest, 2011

Introduction

The Forest Service faces many challenges with its vastly oversized, under-maintained, and unaffordable transportation system. With 370,643 miles of system roads and 137,409 miles of system trails (USDA Forest Service 2019), the network extends broadly across every national forest and grassland and through a variety of habitats, ecosystems and terrains. An impressive body of scientific literature addresses the various effects of roads on the physical, biological and cultural environment. Numerous studies demonstrate the harmful environmental consequences to water, fish, wildlife, and ecosystems.

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 multiple benefits of road removal on the physical, biological and cultural environments.

The first section of this paper provides a literature review summarizing the most recent science related to the environmental impacts of forest roads and motorized trails. The second section focuses on climate change effects and strategies to address the growing ecological consequences to forest resources. The third section provides background and specific direction for the Forest Service to provide for an ecologically and economically sustainable road system, including recommendations for future action.

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 provides access to national forests and grasslands and also harms aquatic and terrestrial environments at multiple scales. In general, the more roads and motorized trails the greater the impacts. Since its emergence, the field of road ecology and the resulting research has proven the magnitude and breadth of ecological issues related to roads; entire books have been written on the topic (e.g., Forman et al. 2003, van der Ree et al. 2015), and research centers continue to expand their case studies, 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 of the impacts of roads and motorized access on terrestrial and aquatic ecosystems, supplementing long-established, peer-reviewed literature reviews on the topic, including Gucinski et al. (2000), Trombulak and Frissell (2000), Coffin (2007), and Robinson et al. (2010). More targeted reviews have been published on the effects of roads on insects (Munoz et al. 2015), vertebrates (da Rosa 2013), and animal abundance (Fahrig and Rytwinski 2009, Benítez-López et al. 2010). Literature reviews on the ecological and social impacts of motorized recreation include Gaines et al. (2003), Davenport and Switalski (2006), Ouren

¹ See <http://www.westerntransportationinstitute.org/programs/road-ecology> and <http://roadecology.ucdavis.edu/>

et al. (2007), Switalski and Jones (2012), and, more recently, Switalski (2017). In addition to the physical and environmental impacts of roads, increased visitation has resulted in intentional and unintentional damage to many cultural and historic sites (Spangler and Yentsch 2008, Sampson 2009, Hedquist et al. 2014).

A. Impacts on geomorphology and hydrology

The construction and 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 (Al-Chokhachy et al. 2016). 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. 2001). In fact, roads contribute more sediment to streams than any other land management activities on Forest Service lands (Gucinski et al. 2000). Surface erosion rates from roads can be up to three orders of magnitude greater than erosion rates from undisturbed forest soils (Endicott 2008).

Erosion and sediment produced from roads occur 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 significantly less sediment than open drivable roads (Sosa Pérez and Macdonald 2017, Foltz et al. 2009).

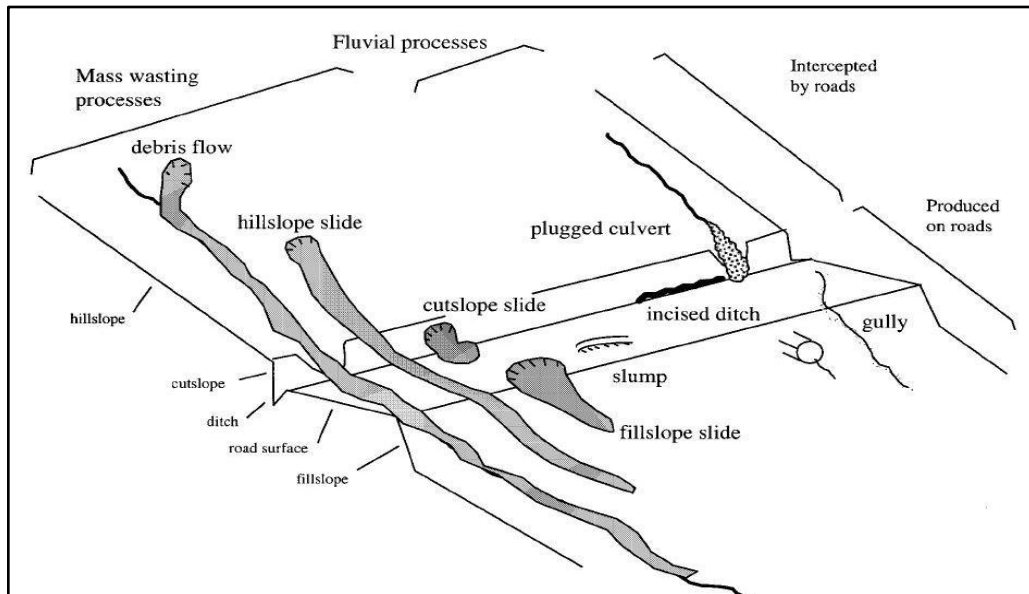


Figure 1: Typology of erosional and depositional features produced by mass-wasting and fluvial processes associated with forest roads (reprinted from Wemple et al. 2001).

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 (Gucinski et al. 2000, Endicott 2008). This typically occurs when culverts are undersized and cannot handle the volume of water funneled through them, or they simply become plugged with debris and sediment. 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. 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 (Gucinski et al. 2000). The width/depth ratio of the stream changes can trigger changes in water temperature, sinuosity and other geomorphic factors important for aquatic species survival (Trombulak and Frissell 2000).

B. 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, increased predation of fish, and reductions in macro-invertebrate populations that are a food source to many fish species (Gucinski et al. 2000, Endicott 2008). Roads close to streams reduce the number of trees available for large wood recruitment, and reduce stream-side shade (Meredith et al. 2014.) On a landscape scale, these effects 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, refugia, and water temperature; Gucinski et al. 2000).

River fragmentation

Roads also act as barriers to migration and fragment habitat of aquatic species (Gucinski et al. 2000). Where roads cross streams, road engineers usually place culverts or bridges. Undersized culverts 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 (Erikinaro et al. 2017). For instance, a culvert may scour on the downstream side of the crossing, actually forming a waterfall up which fish cannot move. Undersized culverts 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. Or, the water can move through the culvert at too high a gradient or velocity to allow fish passage (Endicott 2008).

River fragmentation 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 salmon such as coho (*Oncorhynchus kisutch*), Chinook (*O. tshawytscha*), and chum (*O. keta*); steelhead

(*O. mykiss*), a variety of trout species including bull trout (*Salvelinus confluentus*) and cutthroat trout (*O. clarki*), as well as other native fish and amphibians (Endicott 2008). The restoration and mitigation of impassable road culverts has been found to restore connectivity and increase available aquatic habitat (Erikinaro et al. 2017), and the quality of aquatic habitat (McCaffery et al. 2007).

C. 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 altering adjacent habitat and interference with predator/prey relationships (Coffin 2007, Fahrig and Rytwinski 2009, Robinson et al. 2010, da Rosa and Bager 2013). Some of these impacts result from the road itself, and some result from the uses on and around the roads (access). Ultimately, numerous studies show that roads reduce the abundance, diversity, and distribution of several forest species (Fahrig and Rytwinski 2009, Benítez-López et al. 2010, Munoz et al. 2015).

Abundance and distribution

The extensive research on roads and wildlife establish clear trends of wildlife population declines. Fahrig and Rytwinski (2009) reviewed the empirical literature on the effects of roads and traffic on animal abundance and distribution looking at 79 studies that addressed 131 species. 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, and 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. Muñoz et al. (2015) found that many insect populations have declined as well.

Direct mortality, disturbance, and habitat modification

Road and motorized trail use affect many different types of species. For example, trapping, poaching, collisions, negative human interactions, disturbance and displacement significantly impact wide ranging carnivores (Gaines et al. 2003, Table 1). 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). 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). Roads and motorized trails also affect ecosystems and habitats because they are major vectors of non-native plant and animal species (Gelbard and Harrison 2003). This can have significant ecological and economic impacts when aggressive invading species overwhelm or significantly alter native species and systems.

Table 1: Road- and recreation trail-associated factors for wide-ranging carnivores (Reprinted from Gaines et al. (2003)²

Focal species	Road-associated factors	Motorized trail-associated factors	Nonmotorized trail-associated factors
Grizzly bear	Poaching	Poaching	Poaching
	Collisions	Negative human interactions	Negative human interactions
	Negative human interactions	Displacement or avoidance	Displacement or avoidance
	Displacement or avoidance		
Lynx	Down log reduction	Disturbance at a specific site	Disturbance at a specific site
	Trapping	Trapping	
	Collisions		
	Disturbance at a specific site		
Gray wolf	Trapping	Trapping	Trapping
	Poaching	Disturbance at a specific site	Disturbance at a specific site
	Collisions		
	Negative human interactions		
	Disturbance at a specific site		
Wolverine	Displacement or avoidance		
	Down log reduction	Trapping	Trapping
	Trapping	Disturbance at a specific site	Disturbance at a specific site
	Disturbance at a specific site		
	Collisions		

Habitat fragmentation

At the landscape scale, roads fragment habitat blocks into smaller patches that may not be able to support interior forest species. Smaller habitat patches result in diminished genetic variability, increased inbreeding, and at times local extinctions (Gucinski et al. 2000; Trombulak and Frissell 2000). For example, a narrow forest road with little traffic was a barrier in Arizona to the Mt. Graham red squirrel (*Tamiasciurus hudsonicus grahamensis*; Chen and Koprowski 2013). Fragmentation intensifies concerns about grizzly bear population viability, especially since roads increase human/bear interactions exacerbating the problem of excessive mortality (Proctor et al, 2012)

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 (Robinson et al.2010; Table 2). In heavily roaded landscapes, edge-affected acres can be a significant percentage of total acres. For example, in a landscape where the road density is 3 mi/mi² 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.

² For a list of citations see Gaines et al. (2003).

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

Species	Avoidance zone m (ft)	Type of disturbance	Reference
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)
Grizzly bear	3000 (9840)	Fall	Mattson et al. (1996)
	500 (1640)	Spring and summer	
	1122 (3681)	Open road	Kasworm and Manley (1990)
	665 (2182)	Closed road	
Black bear	274 (899)	Spring, unpaved roads	Kasworm and Manley (1990)
	914 (2999)	Fall, unpaved roads	

Migration disruption

Roads disrupt migration of large ungulates, such as elk, impeding travel at multiple scales, including seasonal home range use and migration to winter range (Buchanan et al. 2014, Prokopenko et al. 2017). For example, a recent study found migrating elk changed their behavior and stopover use on migration routes that were roaded (Paton et al. 2017). The authors suggest this disturbance may lead to decreased foraging, displacement of high-quality habitat, and affect the permeability of the migration route. In addition, roads disrupt grizzly bear movements influencing dispersal away from the maternal home range and ultimately influencing population-level fragmentation.” (Proctor et al. 2018).

Oil and gas development (and associated roads) reduced the effectiveness of both mule deer and pronghorn migration corridors in western Wyoming. (Sawyer et al. 2005). Multiple studies found that mule deer increased their rate of travel during migrations, reducing stop over time and their use of important foraging habitats (Sawyer et al. 2012, Lendrum et al. 2012; Ledrum et al. 2013;). A study in Colorado found that female mule deer changed their migration timing which may change alignment with vegetative phenology and potentially result in energetic and demographic costs (Lendrum et al. 2013).

D. Road density thresholds for fish and wildlife³

It is well documented that, beyond specific road density thresholds, certain species will be negatively affected, and some risk being extirpated (Robinson et al. 2000, Table 3). 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. Grizzly bears have been found to have a higher mortality risk as road density increases (Boullanger and Stenhouse 2014). Gray wolves (*Canis lupus*) in the Great Lakes region and elk in Montana and Idaho also face increased mortality risk, and 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).

A number of studies show that higher road densities also impact aquatic habitats and fish (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, (Carnefix and Frissell (2009), p. 1).

Cold water salmonids such as threatened bull trout, are particularly sensitive to the impacts of forest roads. The U.S. Fish and Wildlife Service’s Final Rule listing bull trout as threatened (USDI Fish and Wildlife Service 1999) addressed road density stating:

... assessment of the interior Columbia Basin ecosystem revealed that increasing road densities were associated with declines in four non-anadromous salmonid species (bull trout, Yellowstone cutthroat trout, westslope cutthroat trout, and redband trout) within the Columbia River Basin, likely through a variety of factors associated with roads (Quigley & Arbelbide 1997). Bull trout were less likely to use highly roaded basins for spawning and rearing, and if present, were likely to be at lower population levels (Quigley and Arbelbide 1997). Quigley et al. (1996) demonstrated that when average road densities were between 0.4 to 1.1 km/km² (0.7 and 1.7 mi/mi²) on USFS lands, the proportion of subwatersheds supporting “strong” populations of key salmonids dropped substantially. Higher road densities were associated with further declines (USDI Fish and Wildlife Service (1999), p. 58922).

Anderson et al. (2012) showed that watershed conditions tend to be best in areas protected from road construction and development. Using the U.S. Forest Service’s Watershed Condition Framework assessment data, they showed that National Forest lands protected under the Wilderness Act tend to have

³ We intend for the term “road density” to refer to the density of all roads within national forests, including system roads, closed roads, non-system roads, temporary roads and motorized trails, and roads administered by other jurisdictions (private, county, state).

the healthiest watersheds. In support of this conclusion, McCaffery et al. (2005) found that streams in roadless watersheds had less fine sediment and higher quality habitat than roaded watersheds. Miller et al. (2017) showed that in 20 years of monitoring forests managed by the Northwest Forest Plan there were measurable improvements in watershed conditions as a result of road decommissioning, finding “...the decommissioning of roads in riparian areas has multiple benefits, including improving the riparian scores directly and typically the sedimentation scores.”

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 re- gion)	>0.45 km/km ² (few packs exist above this threshold); >1.0 km/km ² (no pack exist above this threshold) 0.63 km/km ² (increasing due to greater human tolerance)	Mladenoff et al. (1995)
Wolf (Wisconsin)		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)
Grizzly bear (Montana)	>0.6 km/km ²	Mace et al. (1996); Mattson et al. (1996)
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)
Bull trout (Montana)	Inverse relationship of population and road density	Rieman et al. (1997); Baxter et al. (1999)

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)

E. Roads and Fires

Wildland forest fire plays an essential role in many forest ecosystems, and with climate change, fire will increasingly shape National Forest lands. Humans have made fire more common on the landscape, and studies have found that forest roads can affect fire regimes and localized fuel regimes. Changes in the timing and location of fire can alter the natural fire regime and has negative, cascading effects in ecological communities. For example, a change in timing and frequency of fire can result in habitat loss and fragmentation, shift forest composition, and affect predator-prey interactions (DellaSalla et al. 2004). Following a fire, exposed bare ground on roads can result in chronic erosion, catastrophic culvert failures, and noxious weed invasion.

Forest roads can increase the occurrence of human-caused fires, whether by accident or arson, and road access has been correlated with the number of fire ignitions (Syphard et al. 2007, Yang et al., 2007, Narayanaraj and Wimberly 2012, Nagy et al. 2018). A recent study found that humans ignited four times as many fires as lightning. This represented 92% of the fires in the eastern United States and 65% of the fire ignitions in the western U.S. (Nagy et al. 2018). Another study that reviewed 1.5 million fire records over 20 years found human-caused fires were responsible for 84% of wildfires and 44% of the total area burned (Balch et al. 2017).

In addition to changes in frequency, human-caused fires change the timing of fire occurring when fuel moisture is significantly higher than lightning-started fires (Nagy et al. 2018.). Forest roads may also limit fire growth acting as a fire break and providing access for suppression (Narayanaraj and Wimberly 2011, Robbinne et al. 2016). The result is a spatial and temporal distribution of fire that differs from historical fire regimes.

Roaded areas create a distinct fire fuels profile which may influence ignition risk and burn severity (Narayanaraj and Wimberly 2013). Forest roads create linear gaps with reduced canopy cover, and increased solar radiation, temperature, and wind speed. Invasive weeds and grasses common along roadsides also create fine fuels that are highly combustible. These edge effects can change

microclimates far into the forest (Narayanaraj and Wimberly 2012, Ricotta et al. 2018). While there is little definitive research on roads and burn severity, an increase in the prevalence of lightning-caused fires in roaded areas may be due to roadside edge effects (Arienti et al 2009, Narayanaraj and Wimberly 2012). Furthermore, watersheds that have been heavily roaded have typically received intensive management in the past leaving forests in a condition of high fire vulnerability (Hessburg and Agee 2003).

Roadless areas are remote and secure from many human impacts such as unintentional fire starts or arson. A forest fire is almost twice as likely to occur in a roaded area than a roadless area (USDA Forest Service 2000). In fact, human-ignited wildfire is almost five times more likely to occur in a roaded area than in a roadless area. (USDA Forest Service 2000). Higher road density correlates with an increased probability of human-caused ignitions. (Syphard et al. 2007).

After a forest fire, roads that were previously well vegetated often burn or are bladed for fire suppression access or firebreaks leaving them highly susceptible to erosion and weed invasion. Roads are a source of chronic erosion following a fire, and pulses of hillslope sediment and large woody debris can result in culvert failures (Bisson et al. 2003). Fine sediment is frequently delivered to streams and reduces the quality of aquatic habitat. Noxious weeds are established on many forest roads, and post-fire weed invasion can be facilitated by creating a disturbance, reducing competition, and increasing resource availability (Birdsaw et al. 2012).

II. Climate Change and Transportation Infrastructure

Before the Trump administration took office, the Forest Service recognized the importance of considering and adapting to changing climate conditions. The USDA Strategic Plan for Fiscal Years 2014-2018 set a goal to: “Ensure our national forests and private working lands are conserved, restored, and made more resilient to climate change, while enhancing our water resources.” (USDA 2014, p 3). 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, resulting in damage to streams, fish habitat, and water quality as well as threats to public safety and loss of access. As to 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.

A. Climate change, forest roads, and fragmented habitat

It is expected that climate change will be responsible for more extreme weather events, leading to increasing flood severity, more frequent landslides, changing hydrographs, and changes in erosion and sedimentation rates and delivery processes (Schwartz et al. 2014, USDA FS 2018). The Forest

Service Office of Sustainability and Climate has compiled climate change vulnerability assessments for several regions of the Forest Service discussing near-term consequences for managers to consider. (Halofsky et al. 2017, 2018a, 2018b, 2019, with additional vulnerabilities displayed below in Table 4).

Warmer locations will experience more runoff in winter months and early spring, whereas colder locations will experience more runoff in late spring and early summer. In both cases, future peakflows will be higher and more frequent, (Halofsky et al. 2018b at ii).

The frequency and extent of midwinter flooding are expected to increase. Flood magnitudes are also expected to increase because rain-on-snow-driven peak flows will become more common,” (*Id.* at 83).

Roads and other infrastructure that are near or beyond their design life are at considerable risk to damage from flooding and geomorphic disturbance (e.g., debris slides). If road damage increases as expected, it will have a profound impact on access to Federal lands and on repair costs, (*Id.* at viii).

Magnifying these consequences is the fact that roads, culverts and trails in national forests were designed for storms and water flows typical of past decades, and may not be designed for the storms in future decades. Hence, climate driven changes may cause transportation infrastructure to malfunction or fail (USDA Forest Service 2010, ASHTO 2012). The likelihood is higher for facilities in high-risk settings—such as rain-on-snow zones, coastal areas, and landscapes with unstable geology. The following consequences may occur (USDA Forest Service 2010):

- access to national forests will be interrupted temporarily or permanently as roads wash-out due to landslides or blown-out culverts during events of heavier precipitation or flooding;
- public safety will be compromised as roads, trails and bridges become unstable due to landslides, undercut slopes, or erosion of water-logged slopes due to heavy rainfall; and
- infrastructure may be compromised or abandoned along coastal areas or low-lying estuaries when inundated during high tides and coastal storms as sea-levels rise.

Forests fragmented by roads will likely demonstrate less resistance and resilience to stressors, like those associated with climate change (Noss 2001, see also Table 4. below). First, the more a forest is fragmented (and therefore the higher the edge/interior ratio), the more the forest loses its inertia characteristic, and becomes 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.

Hence, roads may impede the movement of many species in response to climate change. Closing unnecessary roads and providing wildlife crossings on roads with heavy traffic might mitigate some of these effects (Noss 1993; Clevenger & Waltho 2000), (Noss (2001) p. 584).

Watershed types within national forests may change which will impact hydrology and when high streamflows occur (Halofsky et. al. 2011). A study in Washington’s Mt. Baker-Snoqualmie National

Forest (MBSNF) shows that currently 27% of the roads are in watersheds classified as rain-dominated but that will increase to 75% by 2080 - increasing risk of damage to infrastructure (Strauch 2014). By 2040, 300 miles of forest roads in this forest will be located in watersheds that are projected to see a 50% increase in 100-year floods. Landslide risk will be higher during the winter and spring and decline during summer and autumn. These changes reinforce the importance of transportation analysis that incorporates the impacts of climate change.

Earlier snowmelt may open previously snow-closed roaded areas for a greater portion of the year. While this may appear to benefit visitors that wish to access trails and camps early in the spring, this may also put them in harm's way with melting snow-bridges, avalanche chutes and flooding events (Strauch 2015). Wildlife historically protected by snow-closed roads would be more vulnerable.

B. Modifying infrastructure to increase resilience

To prevent or reduce road-triggered landslides and culvert failures, and other associated hazards, forest managers will need to take a series of actions. In December 2012, the USDA Forest Service published a report entitled, *Assessing the Vulnerability of Watersheds to Climate Change* (USDA FS 2012) which reinforces 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 (WVA)] 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).

Other Forest Service reports support road-related actions to increase climate resilience including replacing undersized culverts with larger ones, prioritizing maintenance and upgrades, and restoring roads to a natural state when they are no longer needed and pose erosion hazards (USDA Forest Service 2010, USDA Forest Service 2011a USDA Forest Service 2012a, USDA FS 2018, Halofsky et al. 2018a).

The Forest Service has developed several resources to identify and mitigate climate change impacts on forests and infrastructure. The aforementioned climate change vulnerability assessments for each region focus on causes, consequences, and options to address them. For example, Halofsky et al.

(2018a) reviews the effects and adaptation options for Region 1 (Northern Region) of the Forest Service, and identifies the increased magnitude of peak streamflows as a primary impact to road infrastructure. Adaptation strategies identified in the report include:

...increasing the resilience of stream crossings, culverts, and bridges to higher peakflows and facilitating response to higher peakflows by reducing the road system and disconnecting roads from streams. Tactics include completing geospatial databases of infrastructure (and drainage) components, installing higher capacity culverts, and decommissioning roads or converting them to alternative uses. (Halofsky et al. 2018a)

U.S. Forest Service Transportation Resiliency Guidebook provides a review of the impacts of climate change on Forest Service infrastructure, and a process to assess and address climate change impacts at local and regional levels (USDA FS 2018; Table 4). Included in the guidebook is a step-by-step guide for identifying vulnerabilities and preparedness planning within their transportation network (USDA FS 2018). In addition, the guidebook recommends using the forest plan revision process as “an opportunity to analyze baseline conditions and climate change vulnerabilities and to develop climate resilient strategies for the future.” (USDA FS 2018). The Forest Service should use the transportation resilience guidebook to inform forest plan revision analysis and plan components to address climate change in the context of the forest’s transportation system.

Table 4. Role of adaptation strategies in reducing climate change impacts of Forest Service lands (reprinted from USDA FS 2018).

	Impacts on Transportation	Example Strategies to Reduce Impacts
Heavy Precipitation / Flooding	Flooded roadways interrupting service	Retrofit facilities
	Damage/destruction of roads and bridges	Relocate facilities
	Pavement buckling	Upgrade culverts and drainage facilities
	Erosion comprising soil stability and transportation assets	Build new facilities to climate ready standards
	Slope failures	Protect existing infrastructure
	Landslides damaging and disrupting routes Plugged or blown out culverts	Divest in assets
Wildfires	Additional woody debris that plug culverts	Sustain forest ecology
	Reduced slope stability causing increased landslides	Protect forests from severe fire and wind disturbance
	Increased heavy vehicle traffic wear and tear on FS roadways	
Tree Mortality	Fallen trees disrupt access along transportation routes	Facilitate Forest community adjustments through species transitions
	Increased need for clearing hazard trees along roadways	
	Provide forest fuel for wildfire	

Individual forests have also drafted climate mitigation strategies. The Olympic National Forest in Washington, has developed documents 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* (USDA FS 2011a). The report calls for

road decommissioning, relocation of roads away from streams, enlarging culverts as well as replacing culverts with fish-friendly crossings (Table 5). In the travel management strategy, Olympic National Forest recommended that one third of its road system be decommissioned and obliterated. In addition, the plan called for addressing fish migration barriers in a prioritized and strategic way – most of these are associated with roads.

Table 5: Current and expected sensitivities of fish to climate change and associated adaptation strategies and action for fisheries and fish habitat management and relevant to transportation management at Olympic National Forest and Olympic National Park (reprinted from USDA Forest Service 2011a).

Current and expected sensitivities	Adaptation strategies and actions
Changes in habitat quantity and quality	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	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	Design more resilient stream crossing structures.
Major changes in quantity and timing of streamflow in transitional watersheds	Make road and culvert designs more conservative in transitional watersheds to accommodate expected changes.
Decrease in area of headwater streams	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	Restore habitat in degraded headwater streams that are expected to retain adequate summer streamflow (ONF).

C. Reducing fragmentation to enhance aquatic and terrestrial species adaptation

Reconnecting fragmented forests has been shown to benefit native species (e.g., Damschen et al. 2019). Decommissioning and upgrading roads can reduce fragmentation of both aquatic and terrestrial systems. For example, reducing the amount of road-generated fine sediment deposited on salmonid nests can increase the likelihood of egg survival and spawning success (Switalski et al. 2004, McCaffery et al. 2007). Strategically removing or mitigating barriers such as culverts has been shown to restore aquatic connectivity and expand habitat (Erkinaro et al. 2017). 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, Meridith et al. 2014). Coordinating the repair of an aging road system with the mitigation of aquatic organism passage may allow for restoring connectivity while improving infrastructure (Nesson et al. 2018).

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), and restoring and mitigating migration routes in key wildlife corridors will increase wildlife resiliency. Access management in important elk migration sites would reduce disturbance and improve connectivity (Parton et al. 2017). Similarly, a recent study found grizzly bear population density increased 50 percent following the restriction of motorized recreation (Lamb et al. 2018). Decommissioning roads in key wildlife corridors will also reduce the many road-related stressors. Road decommissioning restores wildlife habitat by providing security and food such as grasses, forbs, and fruiting shrubs (Switalski and Nelson 2011, Tarvainen and Tolvanen 2016).

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).

D. Transportation infrastructure and carbon sequestration

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 restoring roads to a more natural state. When roads are decompacted during reclamation, vegetation and soils can develop more rapidly and sequester large amounts of carbon. Research on the Clearwater National Forest in Idaho estimated total soil C storage increased 6-fold compared to untreated abandoned roads (Lloyd et al. 2013). Another study concluded that reclaiming 425 km (264 miles) of logging roads over the last 30 years in Redwood National Park in Northern California resulted in net carbon savings of 49,000 Megagrams (54,013 tons) of carbon to date (Madej et al. 2013, Table 5). A further analysis found that recontouring roads had higher soil organic carbon than ripping (decompacting) the roads (Seney and Madej 2015). Finally, a recent study in Colorado found that adding mulch or biochar to decommissioned roads can increase the amount of carbon stored in soil (Ramlow et al. 2018).

Kerekvliet et al. (2008) used Forest Service estimates of the fraction of road miles that are unneeded, and calculated that restoring 126,000 miles of roads (i.e. 30% of the road system) 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 6. 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

E. Benefits of roadless areas and intact mature forests for climate change adaptation

Undeveloped natural lands provide numerous ecological benefits. They contribute to biodiversity, enhance ecosystem representation, and facilitate connectivity and provide high quality or undisturbed water, soil and air (Strittholt and Dellasala 2001, DeVelice and Martin 2001, Crist and Wilmer 2002, Loucks et al. 2003, Dellasalla et al. 2011, Anderson et al. 2012, Selva et al. 2015). They can also serve as ecological baselines to help us better understand our impacts to other landscapes, and contribute to landscape resilience in the face of climate change.

Forest Service roadless lands, in particular, are heralded for the conservation values they provide. The benefits 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 the U.S. 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 should take to facilitate adaptation

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

to climate change. The National Park Service also identifies connectivity as a key factor for climate change adaptation along with establishing “blocks of natural landscapes 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.”⁶ Similarly, the *National Fish, Wildlife and Plants Climate Adaptation Partnership’s Adaptation Strategy* (2012) calls for creating an ecologically-connected network of conservation areas.⁷

Crist and Wilmer (2002) looked at the ecological value of roadless lands in the Northern Rockies and found that protection of national forest roadless areas, when added to existing federal conservation lands in the study area, would 1) increase the representation of virtually all land cover types on conservation lands at both the regional and ecosystem scales, some by more than 100%; 2) help protect rare, species-rich, and often-declining vegetation communities; and 3) connect conservation units to create bigger and more cohesive habitat “patches.”

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.

Allowing roadless and other intact forested areas to reach their full ecological potential is an effective and crucial strategy for atmospheric carbon dioxide removal. Moomaw et al (2019) termed this approach as “proforestation” and explained,

⁶ 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.”

⁷ 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.

[f]ar from plateauing in terms of carbon sequestration (or added wood) at a relatively young age as was long believed, older forests (e.g., >200 years of age without intervention) contain a variety of habitats, typically continue to sequester additional carbon for many decades or even centuries, and sequester significantly more carbon than younger and managed stands, (Luyssaert et al., 2008; Askins, 2014; McGarvey et al., 2015; Keeton, 2018).

The authors recommend “scaling up” proforestation, which includes both protecting and expanding designations of intact forested areas, as a cost-effective means to increase atmospheric carbon sequestration.

III. Achieving a Sustainable Minimum Road System on National Forest Lands

A. Background

For two decades, the Travel Management Rule, 36 C.F.R. Part 212, has guided Forest Service road management and use by motorized vehicles. It is divided into three parts: Subpart A, the administration of the forest transportation system; Subpart B, designation of roads, trails, and areas for motor vehicle use; and Subpart C, use by over-snow vehicles. *See* 36 C.F.R. Part 212.

Table 7. Travel Management Rule Subparts – Objectives, Requirements & Products

36 C.F.R. §212	Objective:	Requires:	Product(s):
Subpart A; Roads Rule 2001	To achieve a sustainable national forest road system.	Use a science-based analysis to identify the minimum road system and roads for decommissioning	- Travel Analysis Report - Map with roads identified as “likely needed” and “likely unneeded”
Subpart B; Travel Management Rule 2005	To protect forests from unmanaged off-road vehicle use by ending cross-country travel and ensuring the agency minimizes the harmful effects from motorized recreation.	Designating a system of roads, trails and areas available for off-road vehicle use according to general and specific criteria.	- Motor Vehicle Use Maps that indicate what roads/trails are open for motorized travel
Subpart C; Travel Management Rule	To protect forests from unmanaged over-snow vehicle use in a manner that minimizes their harmful effects.	Designating specific roads, trails and/or areas for oversnow vehicle use according to the criteria per Subpart B.	- Oversnow vehicle maps designating trails and areas for winter motorized recreation

This broad-based national rule is needed because at over 370,000 miles, the Forest Service road system is long enough to circle the earth over 14 times and it is over twice the size of the National Highway System.⁸ It is also indisputably unsustainable from ecological, economic and management perspectives. The majority of the roads were constructed decades ago when design and management techniques did not meet current standards (Gucinski et al. 2000, Endicott 2008), making them more vulnerable to erosion and decay. Further, current design standards and best management practices have not been updated to address climate change realities. Exacerbating the problem are massive Forest Service road maintenance backlogs that forces the agency to forego actions necessary to ensure proper watershed function, such as preventing sediment pollution and sustaining aquatic organism passages. Nationally, the total deferred maintenance backlog reached \$5.5 billion in FY 2019 of which \$3.1 billion is associated with roads.⁹ As a result, the road network is not only a massive economic liability, it is also actively harming National Forest System lands, waters, fish and wildlife.

Over the past two decades the Forest Service - largely due to the Travel Management Rule - has made some limited efforts to identify and implement a sustainable transportation system. Yet, overall the agency has yet to meet the requirements of Subpart A. The challenge for forest managers is figuring out what is a sustainable road system and how to achieve it – a challenge exacerbated by climate change. It is reasonable to define a sustainable transportation system as one where all the roads and trails are located, constructed, and maintained in a manner that minimizes harmful environmental consequences while providing social benefits and within budget constraints. This could potentially be achieved through the use of effective best management practices. However, the reality is that even the best transportation 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 1996), 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 yesterday may no longer be sustainable under climate change realities since roads designed to meet older climate criteria may no longer hold up under new scenarios (USDA Forest Service 2010, USDA Forest Service 2011b, USDA Forest Service 2012a, AASHTO 2012, Schwartz et al. 2014, USDA FS 2018, Halofsky et al. 2018a, 2018b).

Given consistent budget shortfalls and increasing risks from climate change vulnerabilities, it is clear the agency has an urgent need to both identify and implement a minimum road system, one that will ensure the protection of all Forest Service system lands. However, without specific direction from the Forest Service's Washington D.C. office or Congress, it is reasonable to expect the agency will continue to rely on piecemeal, project-level analyses to identify the minimum road system. Such an approach is inefficient, and insufficient to achieve a sustainable road system forestwide.

⁸ USDOT Federal Highway Administration, Office of Highway Policy Information. <https://www.fhwa.dot.gov/policyinformation/pubs/hf/pl11028/chapter1.cfm>

⁹ USDA Forest Service. 2019. FY2020 Budget Justification. p.83.

Further, where the Forest Service does act to comply with Subpart A, it typically fails to consider shortcoming in its previous travel analysis processes. In fact, an independent review of 38 Travel Analysis Processes and corresponding reports conducted in 2016 by the U.S. Department of Transportation John A. Volpe National Transportation Systems Center found three overarching concerns:

- A lack of clarity regarding the process;
- Failure to follow 36 CFR 212.5(b) direction and Washington Office guidance; and
- Omission of required documents, referenced appendices, or key supporting materials.

Compounding these concerns is the fact that not only do project-level NEPA analyses fail to account for the TAP shortcomings, they also fail to consider real road/motorized densities when identifying the minimum road system. Moreover, these analyses erroneously assume best management practices and project-specific design features will be effective when the Forest Service authorizes actions to achieve a sustainable road system. Finally, if the project-level decision includes actual road decommissioning, the analysis typically fails to consider or specify treatments, resulting in a legacy of ghost-roads persisting on the landscape. The following sections expand on these shortcomings, which the Forest Service must consider in all project-level analyses, and when revising its land and travel management plans.

B. Using Real Road and Motorized Trail Densities to Identify a Minimum Road System

As the Forest Service works to comply with Subpart A, it is crucial that the agency incorporate the true road and motorized trail densities in both its travel analysis process and NEPA-level analyses. Further, the agency must establish standards in land management plan revisions and amendments to ensure each forest achieves an ecologically sustainable minimum road system. Road density analyses should include closed roads, non-system roads, temporary roads, and motorized trails. Typically, the Forest Service calculates road density by looking only at open system road density. From an ecological standpoint, this is a flawed approach since it leaves out the density calculations of a significant percent of roads and motorized trails on the landscape. These additional roads and motorized trails impact fish, wildlife, and water quality, and in some cases, have more of an impact than open system roads. In this section, we provide justification for why a road density analyses should include more than just open road density whenever the Forest Service evaluates the ecological health of an area during NEPA-level analysis or other processes such as for watershed assessments, forest plan revisions or during travel analysis.

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.” 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 often have more miles of closed

roads which are still hydrologically connected and negatively affecting aquatic and wildlife habitat. This higher density occurs because many road “closures” may block vehicle access, but do nothing to mitigate the hydrologic alterations the road causes. The problem is often further compounded 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 techniques are followed. Flow diversions, sediment runoff, and illegal incursions will continue unabated if the road is not hydrologically stabilized and adequately blocked from motorized traffic. 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 (USDA Forest Service 2012b).

As noted above, many species benefit when roads are closed to motorized use. However, the fact remains that closed system roads are often breached resulting in impacts to fish and wildlife. A significant portion of gates and closure devices are ineffective at preventing motorized use (Griffin 2004, USFWS 2007). For example, in a 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 examine 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 motorized use, 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 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 (USDA Forest Service 2008).

Impacts of unauthorized (non-system) roads

As of 1998, there were approximately 130,000 miles of non-system roads in national forests (USDA Forest Service, 1998). However, the creation of unauthorized roads continues to be a problem as the Forest Service struggles to properly enforce travel management plans protecting areas from motorized travel. No requirements are in place directing the agency to track or inventory unauthorized roads, therefore currently their precise number is unknown. These roads contribute

significantly 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 only way to do this is for the Forest Service to include all roads, including non-system roads, when measuring impacts. 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 of 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 direction, temporary roads often remain for much longer because timber sale contracts typically last 3-5 years or more. If the timber purchaser builds a temporary road in the first year of a five-year contract, its intended use may not end until the full project is complete, which can include post-harvest actions such as prescribed burning. Even though the contract often requires the purchaser to close, obliterate and seed the roadbed with native vegetation, this work typically occurs after a few years of treatment activities. The temporary road, therefore, could remain open for 7-8 years or longer before the FSM ten-year clock starts ticking. Therefore, temporary roads can legally remain on the ground for up to 20 years or more, yet they are constructed with fewer environmental safeguards than modern system roads. Exacerbating the problem is the rise of landscape-scale projects that last between 10-20 years. Unless there is explicit direction requiring temporary road removal within a certain time after treatment activities, it is likely these roads could persist for decades.

Impacts of motorized trails

Motorized use on trails has serious harmful effects similar to roads, and it is crucial for the Forest Service to include motorized trails in its density calculations. As we note several times in Section I above, scientific research and agency publications find similar impacts between motorized trails and roads. Off-road vehicle (ORV) use on trails impact multiple resources, resulting in soil compaction and erosion, trampling of vegetation, as well as wildlife habitat loss, disturbance, and direct mortality. Many of these impacts increase on trails not planned or designed for vehicles, as is often the case when the Forest Service designates ORVs on trails built for hiking or equestrian uses. In many instances the agency designates motorized use on unauthorized trails created through illegal use or from a legacy of unmanaged cross-country travel, further exacerbating the related harmful

effects. For a full review of the environmental and cultural impacts on forest lands see Switalski and Jones (2012), and for a review of impacts in arid environments see Switalski (2018).

C. Using Best Management Practices to Achieve a Sustainable Road System

Numerous Best Management Practices (BMPs) were developed to help create a more sustainable transportation system and identify restoration opportunities. BMPs provide science-based criteria and direction 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). The report entitled, *National Best Management Practices for Water Quality Management on National Forest System Lands*, includes specific road BMPs for controlling erosion and sediment delivery into waterbodies and maintaining water quality (USDA FS 2012b). These BMPs cover road system planning, design, construction, maintenance, and decommissioning as well as other transportation-related activities.

Forest Service BMPs - Implementation and Effectiveness

While national BMPs have been established, the effectiveness of individual BMPs, and whether they are implemented at all, is in question. Furthermore, design features are increasingly replacing BMPs for project-level mitigation of road-related environmental impacts. These design features are not consistent among projects, but rather adapted from forest plans and state BMPs, rather than national Forest Service guidelines. Design features need to be standardized, and their rate of implementation and effectiveness systematically reviewed.

When considering how effective BMPs are at controlling nonpoint pollution on roads, both the rate of implementation, and their effectiveness should both be considered. The Forest Service tracks the rate of implementation and the relative effectiveness of BMPs from in-house audits. This information is summarized in the *National BMP Monitoring Summary Report* with the most recent data being the fiscal years 2013-2014 (Carlson et al. 2015). The rating categories for implementation are “fully implemented,” “mostly implemented,” “marginally implemented,” “not implemented,” and “no BMPs.” “No BMPs” represents a failure to consider BMPs in the planning process. More than a hundred evaluations on roads were conducted in FY2014. Of these evaluations, only about one third of the road BMPs were found to be “fully implemented” (Carlson et al. 2015, p. 12).

The monitoring audit also rated the relative effectiveness of the BMP. The rating categories for effectiveness are “effective,” “mostly effective,” “marginally effective,” and “not effective.” “Effective” indicates no adverse impacts to water from project or activities were evident. When treated roads were evaluated for effectiveness, almost half of the road BMPs were scored as either “marginally effective” or “not effective” (Carlson et al. 2015, p. 13). However, BMPs for completed road decommissioning projects showed approximately 60 percent were effective and mostly effective combined, but it was unclear what specific BMPs account for this success (Carlson et al.

2015, p. 35). As explained below, road recontouring that restores natural hillside slopes is a more effective treatment compared to those that leave road features intact.

A recent technical report by the Forest Service entitled, *Effectiveness of Best Management Practices that Have Application to Forest Roads: A Literature Synthesis* summarized research and monitoring on the effectiveness of different BMP treatments for road construction, presence and use (Edwards et al. 2016). They found that while several studies have found some road BMPs are effective at reducing delivery of sediment to streams, the degree of each treatment has not been rigorously evaluated (Edwards et al. 2016). Few road BMPs have been evaluated under a variety of conditions, and much more research is needed to determine the site-specific suitability of different BMPs (Edwards et al. 2016, also see Anderson et al. 2011).

Edwards et al. (2016) cites several reasons for why BMPs may not be as effective as commonly thought. Most watershed-scale studies are short-term and do not account for variation over time, sediment measurements taken at the mouth of a watershed do not account for in-channel sediment storage and lag times, and it is impossible to measure the impact of individual BMPs when taken at the watershed scale. When individual BMPs are examined there is rarely broad-scale testing in different geologic, topographic, physiological, and climatic conditions. Further, Edwards et al. (2016) observes, “The similarity of forest road BMPs used in many different states’ forestry BMP manuals and handbooks suggests a degree of confidence validation that may not be justified,” because they rely on just a single study. Therefore, BMP effectiveness would require matching the site conditions found in that single study, a factor land managers rarely consider.

Climate change will further put into question the effectiveness of many road BMPs (Edwards et al. 2016). While the impacts of climate will vary from region to region (Furniss et al. 2010), more extreme weather is expected across the country which will increase the frequency of flooding, soil erosion, stream channel erosion, and variability of streamflow (Furniss et al. 2010). BMPs designed to limit erosion and stream sediment for current weather conditions may not be effective in the future. Edwards et al. (2016) states, “More-intense events, more frequent events, and longer duration events that accompany climate change may demonstrate that BMPs perform even more poorly in these situations. Research is urgently needed to identify BMP weaknesses under extreme events so that refinements, modifications, and development of BMPs do not lag behind the need.”

The uncertainties about BMP effectiveness as a result of climate change, compounded by the inconsistencies revealed by BMP evaluations, suggest that the Forest Service cannot simply rely on them, or design features/criteria, as a means to mitigate project-level activities. This is especially relevant where the Forest Service relies on the use of BMPs instead of fully analyzing potentially harmful environmental consequences from road design, construction, maintenance or use, in studies and/or programmatic and site-specific NEPA analyses.

D. Effectiveness of Road Decommissioning Treatments

In order to truly achieve a sustainable minimum road system, the Forest Service must effectively remove unneeded roads. According to the Forest Service, the objective of road decommissioning is to “stabilize, restore, and revegetate unneeded roads to a more natural state to protect and enhance NFS lands” (FSM 7734.0). However, rather than actively removing roads, the Forest Service is increasingly relying on abandoning roads to reach decommissioning treatment objectives (Apodaca et al. 2018). Simply closing or abandoning roads will lead to continued resource damage. Other treatments such as ripping the roadbed or installing drainage such as waterbars or dips, have limited and often short-term benefits to natural resources (e.g., Luce 1997, Switalski et al. 2004, Nelson et al. 2010). Recontouring roads is the only proven method to attain the intended outcome of road decommissioning.

Several studies have documented the benefits of fully recontouring roads for ecological restoration. Lloyd et al. (2013) found that rooting depths were much deeper in recontoured roads than in abandoned roads in Idaho, and soil organic matter was an order of magnitude higher on recontoured roads than abandoned roads. Further studies show that soil carbon storage is much higher on recontoured roads as well. A study in Northern California found that recontouring roads resulted in higher soil organic carbon than ripping the roads (Seney and Madej 2015). Higher tree growth and wildlife use has also been found on and near recontoured roads than ripped or abandoned roads (Kolka and Smidt 2004, Switalski and Nelson 2011). Switalski and Nelson (2011) found increased use by black bears on recontoured roads than closed or abandoned roads due to increased food availability and increased habitat security. In addition, removing culverts at stream crossings results in restoring aquatic connectivity and expanding habitat (Erkinaro et al. 2017).

Legacy Roads Monitoring Project

Since 2008, the Forest Service Rocky Mountain Research Station has conducted systematic monitoring on the effectiveness of decommissioned roads in reducing hydrologic and geomorphic impacts from the Forest Service road network. One intent of the monitoring project was to gauge the success of the Legacy Roads and Trails Program that Congress established to provide dedicated funding for the treatment and removal of unnecessary forest roads. The monitoring found that recontouring roads and restoring stream crossings results in dramatic declines in road-generated sediment. Storm-proofing treatments lead to fewer benefits, and on control sites (untreated or abandoned roads), high levels of sediment delivery continued, and the risk of culvert failures remained. For example, a study on the Lolo Creek Watershed on the Clearwater National Forest found a 97% reduction in road/stream connectivity following road recontour (Cissel et al. 2011). Using field observations and the Geomorphic Roads Analysis and Inventory Package (GRAIP), they found a reduction of fine sediments from 38.1 tonnes/year to 1.3 tonnes/year along 3.5 miles of road. Furthermore, they found that restoring road/stream crossings eliminated the risk of culverts plugging, stream diversions, and fill lost at culverts (Table 8).

On the other hand, monitoring conducted on the Caribou-Targhee National Forest found only a 59% reduction of fine sediment delivery from a combination of storm proofing (installation of drain dips), ripping, tilling, and outsloping techniques. There was a reduction of 34.9 tons/year to 14.1 ton/year – leaving a significant amount of sediment continuing to be delivered to streams. Additionally, some stream crossing culverts were not treated and the risk of plugging remained leaving 330 m³ of fill material at risk. While trail conversion and decommissioning treatments reduced slope failure risks, in some cases storage treatments actually increased the risk of failure (Nelson et al. 2010). Additional monitoring studies conducted in Montana, Idaho, Washington, Oregon, and Utah have similar results.¹⁰

Table 8. Summary of GRAIP road risk predictions for a watershed on the Clearwater National Forest road decommissioning treatment project (reprinted from Cissel et al. 2011).

IMPACT/RISK TYPE	EFFECT OF TREATMENT: INITIAL GRAIP PREDICTION
Road-stream hydrologic connectivity	-97%, -2510 m
Fine Sediment Delivery	-97%, -36.8 tonnes/yr.
Landslide Risk	Reduced to near natural condition
Gully Risk	Reduced from very low to negligible
Stream Crossing Risk -plug potential -fill at risk -diversion potential	-100% eliminated at 9 sites -100%, 268 m ³ fill removed -100%, eliminated at 3 sites
Drain Point Problems	17 problems removed, 4 new problems

The Forest Service recognizes that fundamental to road decommissioning is revegetating the roadbed. FSM 7734 states, “Decommission a road by reestablishing vegetation and, if necessary, initiating restoration of ecological processes interrupted or adversely impacted by the unneeded road.” However, roads are inherently difficult to revegetate because of compaction, lack of soil and organic material, low native seedbank, and presence of noxious weeds (Simmers and Galatowitsch 2010, Ramlow et al. 2018). Many recently acquired industrial timberlands (e.g. Legacy Lands) have

¹⁰ For reports visit <https://www.fs.fed.us/GRAIP/LegacyRoadsMonitoringStudies.shtml>

road systems with limited canopy cover, little woody debris available, and a large weed seedbank. Thus, revegetation is going to be particularly challenging on these lands.

Consistent application of BMPs that direct recontouring roads for decommissioning will be essential to ensure the treatments best achieve improvements in ecological conditions. More than any other treatment, road recontouring ensures complete decompaction of the roadbed, incorporates native soils that were side-cast during construction, and prevents motorized use. This in turn increases plant rooting depths, soil carbon storage, tree growth, and wildlife use. Any earth disturbing activity can create conditions favorable to noxious weeds, so treating weeds before any treatment and ensuring quick revegetation can limit weeds spread. Applying road recontour BMPs that also mitigate risks associated with noxious weed expansion will help prevent their spread

Conclusion

Numerous studies show that roads and motorized trails negatively impact the ecological integrity of terrestrial and aquatic ecosystems and watersheds. There is ample evidence to confirm the harm to wildlife, aquatic species, water quality, and natural processes from forest roads and motorized use. In addition, the evolving science surrounding roads and wildfire demonstrate a direct link between access and human-caused ignitions, and also suggests that land managers must consider how roads affect fire behavior. Minimizing these impacts by reducing road densities could be an effective solution.

An increasing body of literature exists demonstrating that not only is the Forest Service's transportation infrastructure highly vulnerable to climate change, but also that roads exacerbate climate change's harmful effects to other resources. The agency itself has published multiple reports and guidelines for adaptation, yet few forests are fully translating the information into tangible actions. The Forest Service must implement climate change adaptations now, including protecting and expanding intact forests as part of a growing effort to promote natural climate change solutions. Opportunities exist to reduce fragmentation, sequester carbon, and expand roadless areas by implementing a minimum road system.

The Forest Service must take seriously its mandate to achieve an ecologically and economically sustainable forest road system by fully complying with the Roads Rule's requirements. The Forest Service's attempt to identify a minimum road system has come up short. Inconsistent policy interpretations, poorly developed travel analysis reports and lack of accountability has largely left this goal wholly out of reach. Yet this work remains vitally important, especially in the context of climate change. The Forest Service must reinvigorate its efforts to comply with the rule's requirements. Towards this end, the agency must include current science, particularly related to future climate conditions. All road and motorized trail densities should be included in the analysis. When the agency actually does identify a minimum road system and proposes to remove unneeded roads, it must carefully evaluate the effectiveness of all proposed BMPs and design features, and fully

implement the most effective decommissioning treatments to maximize restoring ecological integrity to the area. These actions will ensure the Forest Service finally achieves its goal to establish a truly sustainable forest road system.



Recontoured road, Olympic National Forest - Skokomish Watershed, 2017. By WildEarth Guardians

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