



File Code: 2300/2500/7700

Date: March 29, 2012

Route To:

Subject: Travel Management, Implementation of 36 CFR, Part 202, Subpart A (36 CFR 212.5(b))

To: Regional Foresters, Station Directors, Area Director, IITF Director, Deputy Chiefs and WO Directors

This letter is to reaffirm agency commitment to completing a travel analysis report for Subpart A of the travel management rule by 2015 and update and clarify Agency guidance. This letter replaces the November 10, 2010, letter on the same topic.

The Agency expects to maintain an appropriately sized and environmentally sustainable road system that is responsive to ecological, economic, and social concerns. 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.

Forest Service regulations at 36 CFR 212.5(b)(1) require the Forest Service to identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System (NFS) lands. In determining the minimum road system, the responsible official must incorporate a science-based roads analysis at the appropriate scale. Forest Service regulations at 36 CFR 212.5(b)(2) require the Forest Service to identify NFS roads that are no longer needed to meet forest resource management objectives.

Process

Travel analysis requires a process that is dynamic, interdisciplinary, and integrated with all resource areas. With this letter, I am directing the use of the travel analysis process (TAP) described in Forest Service Manual 7712 and Forest Service Handbook (FSH) 7709.55, Chapter 20. The TAP is a science-based process that will inform future travel management decisions. Travel analysis serves as the basis for developing proposed actions, but does not result in decisions. Therefore, travel analysis does not trigger the National Environmental Policy Act (NEPA). The completion of the TAP is an important first step towards the development of the future minimum road system (MRS). All NFS roads, maintenance levels 1-5, must be included in the analysis.

For units that have previously conducted their travel or roads analysis process (RAP), the appropriate line officer should review the prior report to assess the adequacy and the relevance of their analysis as it complies with Subpart A. This analysis will help determine the appropriate scope and scale for any new analysis and can build on previous work. A RAP completed in accordance with publication FS-643, "Roads Analysis: Informing Decisions about Managing the



National Forest Transportation System,” will also satisfy the roads analysis requirement of Subpart A.

Results from the TAP must be documented in a **travel analysis report**, which shall include:

- A map displaying the roads that can be used to inform the proposed action for identifying the MRS and unneeded roads.
- Information about the analysis as it relates to the criteria found in 36 CFR 212.5(b)(1).

Units should seek to integrate the steps contained in the Watershed Condition Framework (WCF) with the six TAP steps contained in FSH 7709.55, Chapter 20, to eliminate redundancy and ensure an iterative and adaptive approach for both processes. We expect the WCF process and the TAP will complement each other. The intent is for each process to inform the other so that they can be integrated and updated with new information or where conditions change. The travel analysis report described above must be completed by the end of FY 2015.

The next step in identification of the MRS is to use the travel analysis report to develop proposed actions to identify the MRS. These proposed actions generally should be developed 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.

The administrative unit must analyze the proposed action and alternatives in terms of whether, per 36 CFR 212.5(b)(1), the resulting road system is 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;
- Ensure that the identified system minimizes adverse environmental impacts associated with road construction, reconstruction, decommissioning, and maintenance.

The resulting decision identifies the MRS and unneeded roads for each subwatershed or larger scale. The NEPA analysis for each subwatershed must consider adjacent subwatersheds for connected actions and cumulative effects. The MRS for the administrative unit is complete when the MRS for each subwatershed has been identified, thus satisfying Subpart A. To the extent that the subwatershed NEPA analysis covers specific road decisions, no further NEPA analysis will be needed. To the extent that further smaller-scale, project-specific decisions are needed, more NEPA analysis may be required.

A flowchart displaying the process for identification of the MRS is enclosed with this letter.

Timing

The travel analysis report **must be completed by the end of FY 2015**. Beyond FY 2015, no Capital Improvement and Maintenance (CMCM) funds may be expended on NFS roads (maintenance levels 1-5) that have not been included in a TAP or RAP.

Leadership

The Washington Office lead for Subpart A is Anne Zimmermann, Director of Watershed, Fish, Wildlife, Air and Rare Plants. Working with her on the Washington Office Steering Team are Jim Bedwell, Director of Recreation, Heritage, and Volunteer Resources, and Emilee Blount, Director of Engineering. I expect the Regions to continue with the similar leadership structures which have been established.

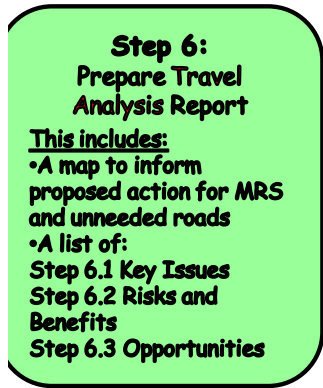
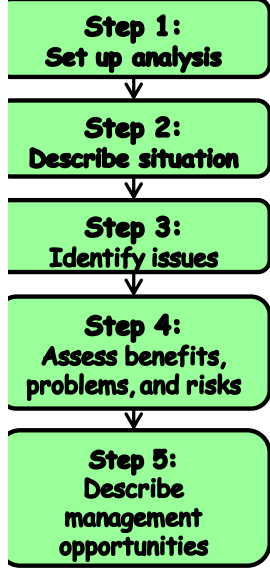
Your leadership and commitment to this component of the travel management rule is important. Together, we will move towards an ecologic, economic, and socially sustainable and responsible national road system of the future.

/s/ James M. Pena (for):

LESLIE A. C. WELDON

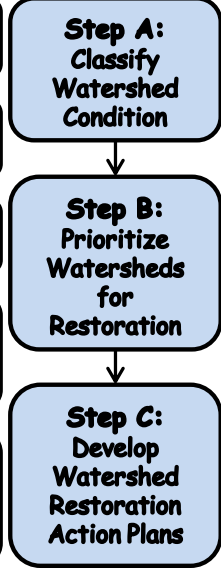
Deputy Chief, National Forest System

TAP Pre-NEPA

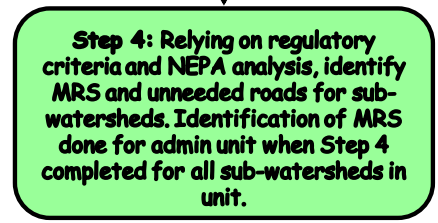
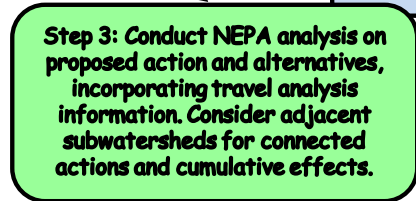
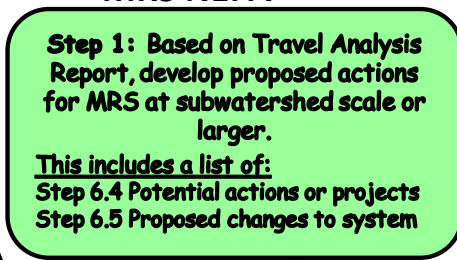


TAP steps to be completed by end of FY 2015

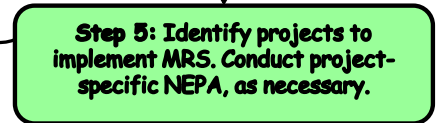
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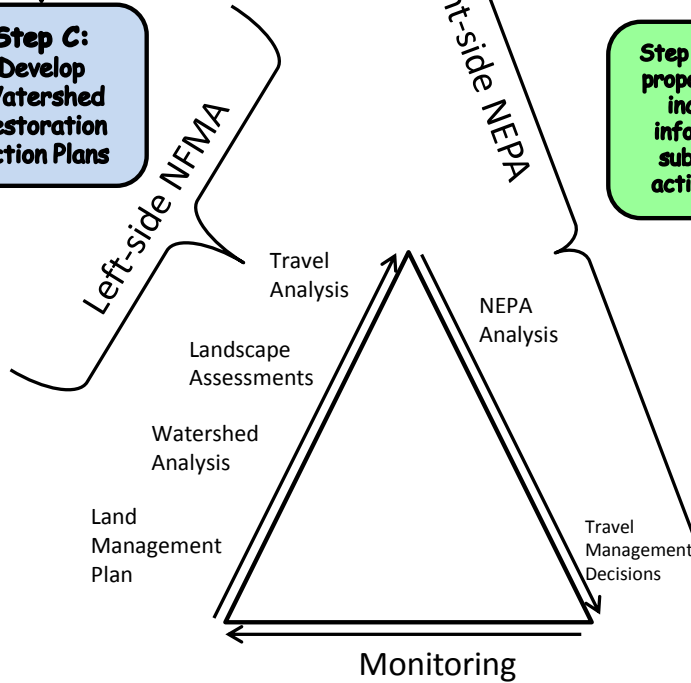
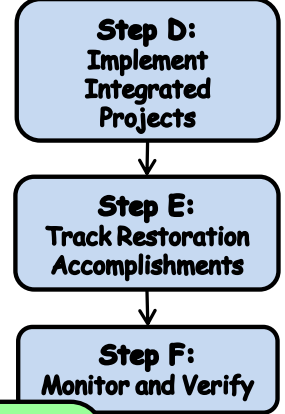
MRS NEPA



Subpart A is Satisfied



WCF NEPA





File Code: 2300/2500/7700

Date: November 10, 2010

Route To:

Subject: Travel Management, Implementation of 36 CFR, Part 212, Subpart A (36 CFR 212.5(b))

To: Regional Foresters, Station Directors, Area Director, IITF Director, Deputy Chiefs and WO Directors

Travel planning is intended to identify opportunities for the forest transportation system to meet current or future management objectives, based on ecological, social, cultural, and economic concerns. As you know, the Forest Service *Travel Management Rule*, promulgated in 2005, has three parts:

- Subpart A – 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.

Over the past 5 years, the Agency has made great strides in completing Subpart B of the *Travel Management Rule* (rule), which was prioritized in order to stop uncontrolled cross-country motor vehicle use. Approximately sixty-seven percent of National Forest System (NFS) lands are covered by a motor vehicle use map. It is anticipated that 93 percent of NFS lands will be covered by December 31, 2010.

Subpart A of the *Travel Management Rule*

This letter is to reaffirm agency commitment to completing those sections of Subpart A of the rule which requires each unit of the NFS to:

- Identify the minimum road system needed for safe and efficient travel and for the protection, management, and use of NFS lands; and
- Identify roads that are no longer needed to meet forest resource management objectives and; therefore, scheduled for decommissioning or considered for other uses (36 CFR 212.5(b)).

By completing the applicable sections of Subpart A, the Agency expects to identify and maintain an appropriately sized and environmentally sustainable road system that is responsive to ecological, economic, and social concerns. 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.



Process

Identifying the minimum road system and unneeded roads requires a travel analysis process that is dynamic, interdisciplinary, and integrated with all resource areas. With this letter, I am directing the use of the travel analysis process (TAP) described in Forest Service Manual 7712 and Forest Service Handbook (FSH) 7709.55, Chapter 20, to complete the applicable sections of Subpart A. The TAP is a science-based process that will ensure future travel-management decisions are based on the consideration of environmental, social, and economic impacts. All NFS roads, maintenance levels 1-5, must be included in the analysis.

For units that have previously conducted travel analysis or roads analyses (RAPs), the appropriate line officer should review the prior report to: 1) assess the adequacy of the analysis and the relevance of any recommendations to the process for complying with Subpart A; 2) help determine the appropriate scope and scale for any new analysis; and 3) build on previous work. A RAP completed in accordance with publication FS-643, "Roads Analysis: Informing Decisions about Managing the National Forest Transportation System," will also satisfy the roads analysis requirement of Subpart A.

Although the TAP does not include a National Environmental Policy Act (NEPA) decision, we expect line officers to engage the public in the process, which should involve a broad spectrum of interested and affected citizens, other State and Federal agencies, and tribal governments.

Results from the TAP must be documented in a **travel analysis report**, which should include:

- Information about the analysis and recommendations;
- A map displaying the recommended minimum road system;
- A list of recommended unneeded roads; and
- Further reporting requirements identified in Step 6 of FSH 7709.55, Chapter 20.

Each regional forester must certify that TAP reports for units within their region comply with this direction and are consistent with national policy.

In complying with this direction, units should seek to integrate the steps contained in the Watershed Condition Framework (WCF) with the six TAP steps contained in FSH 7709.55, Chapter 20, to eliminate redundancy and ensure an iterative and adaptive approach for both processes. We expect that the WCF process, and especially the initial watershed condition assessment (Step A) to be completed by March 31, 2011, will provide important information for your work on Subpart A, while the TAP process will likewise provide information for the WCF process. The intent is for each process to inform the other so that they can be integrated and updated with new information or where conditions change. However, the Agency expectation is that each process will move forward: units should not halt one process to wait for the other.



Timing

The travel analysis report **must be completed by the end of FY 2015**. Beyond FY 2015, no Capital Improvement and Maintenance (CMCM) funds may be expended on NFS roads (maintenance levels 1-5) that have not been included in a TAP or RAP.

Once certified by the regional forester, units are directed to immediately use the TAP reports to inform resource assessments, project and forest plan NEPA decisions to achieve the TAP recommendations.

Leadership

The Washington Office lead for Subpart A is Anne Zimmermann, Director of Watershed, Fish, Wildlife, Air and Rare Plants. Working with her on the Washington Office Steering Team are Jim Bedwell, Director of Recreation, Heritage, and Volunteer Resources, and Richard Sowa, Director of Engineering. I expect regions to create a similar leadership structure to lead this integrated effort.

This work will require significant financial and human resources. Your leadership and commitment to this component of the *Travel Management Rule* is important. Together, we will move towards an ecologic, economic, and socially sustainable and responsible national road system of the future.

/s/ James M. Pena (for) Joel D. Holtrop
JOEL D. HOLTROP
Deputy Chief, National Forest System





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

March 2020



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Acknowledgements: We thank The Wilderness Society for the report titled, *Transportation Infrastructure and Access on National Forests and Grasslands: A Literature Review*. May 2014. This paper updates and revises the original report adding 59 additional citations, and featuring several new sections. We also thank Adam Switalski, Principal of InRoads Consulting, LLC for the bulk of this report’s research and technical writing.

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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).

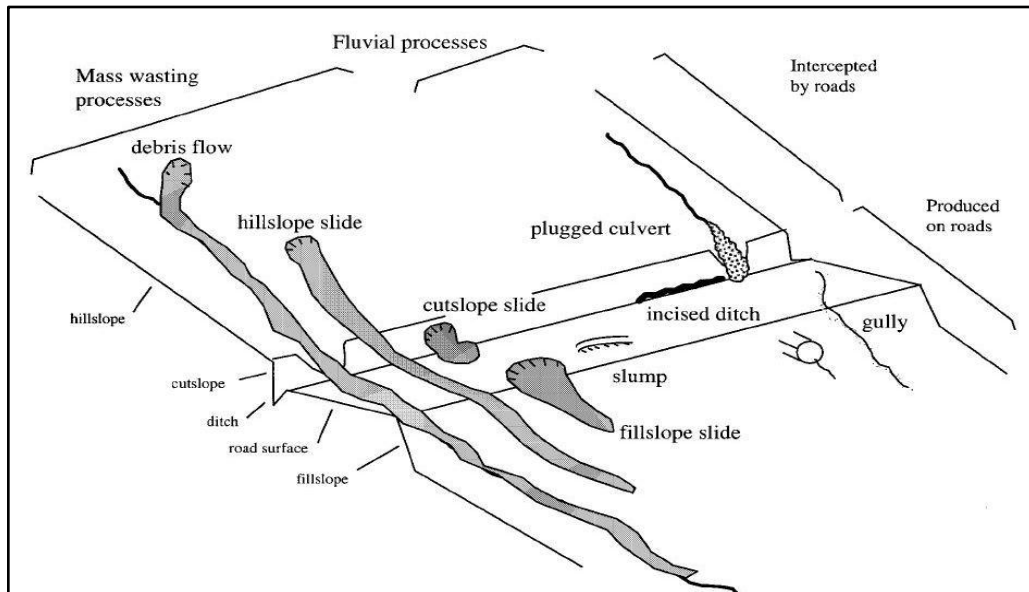


Figure 1: Typology of erosional and depositional features produced by mass-wasting and fluvial processes associated with forest roads (reprinted from Wemple et al. 2001).

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 (Boulienger 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* (Furniss et al., 2013) 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, (Furniss et al., 2013, 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, Furniss et al., 2013, 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 Damage/destruction of roads and bridges Pavement buckling Erosion comprising soil stability and transportation assets Slope failures Landslides damaging and disrupting routes Plugged or blown out culverts	Retrofit facilities Relocate facilities Upgrade culverts and drainage facilities Build new facilities to climate ready standards Protect existing infrastructure Divest in assets
Wildfires	Additional woody debris that plug culverts Reduced slope stability causing increased landslides Increased heavy vehicle traffic wear and tear on FS roadways	Sustain forest ecology Protect forests from severe fire and wind disturbance
Tree Mortality	Fallen trees disrupt access along transportation routes Increased need for clearing hazard trees along roadways Provide forest fuel for wildfire	Facilitate Forest community adjustments through species transitions

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. The importance of Roadless Areas and intact mature forests

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

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

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 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.

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.

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,

[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	- Oversnow vehicle maps designating trails and areas for winter motorized recreation

		Subpart B.	
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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, AASHTO 2012, Furniss et al., 2013, 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

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.

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.

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 2012).

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 2012). 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

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

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 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 as soon as possible, 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 fulfil its mandate to achieve an ecologically and economically sustainable forest road system by fully complying with the Roads Rule’s requirement to identify a minimum road system. Inconsistent policy interpretations, inadequate 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 should 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

REFERENCES

1. AASHTO. 2012. Adapting Infrastructure to Extreme Weather Events: Best Practices and Key Challenges. Background Paper. AASHTO Workshop. Traverse City, Michigan, May 20, 2012. Available at: http://climatechange.transportation.org/pdf/adapt_background5-20-12.pdf.
2. Adams, J.C., and S.F. McCool. 2009. Finite recreation opportunities: The Forest Service, the Bureau of Land Management, and off-road vehicle management. *Natural Areas Journal* 49: 45–116.
3. Al-Chokhachy, R., T. A Black, C. Thomas C. H Luce, B. Rieman, R. Cissel, A. Carlson, S. Hendrickson, E. K. Archer, and J. L. Kershner. 2016. Linkages between unpaved forest roads and streambed sediment: why context matters in directing restoration. *Restoration Ecology* 24(5).
4. Anderson, C.J.; Lockaby, B.G. 2011. Research gaps related to forest management and stream sediment in the United States. *Environmental Management*. 47: 303-313.
5. Anderson, H.M., C. Gaolach, J. Thomson, and G. Aplet. 2012. Watershed Health in Wilderness, Roadless, and Roaded Areas of the National Forest System. *Wilderness Society Report*. 11 p.
6. Arienti, M.C., S.G. Cumming, M.A. Krawchuk, and S. Boutin. 2009. Road network density correlated with increased lightning fire incidence in the Canadian western boreal forest. *International Journal of Wildland Fire* 18 (8): 970–982.
7. Apodaca, M., M. Tippie, A.M Verde, V. Barandino, B. Jones, J. Rios. 2018. Guidelines for storing and decommissioning roads. USDA Forest Service, National Technology and Development Program. 58p.
8. Balch, J.K., B.A. Bradley, J.T. Abatzoglou, R.C. Nagy, E.J. Fusco, and A.L. Mahood. 2017. Human-started wildfires expand the fire niche across the United States. *PNAS* 114(11): 2946-2951.
9. Battin J., M.W. Wiley, M.H. Ruckelshaus, R.N. Palmer, E. Korb, K.K. Bartz, and H. Imaki. 2007. Projected impacts of climate change on salmon habitat restoration. *Proceedings of the National Academy of Sciences of the United States of America* 104: 6720–6725.
10. Baxter, C.V., C.A. Frissell, and F.R. Hauer. 1999. Geomorphology, logging roads, and the distribution of bull trout spawning in a forested river basin: implications for management and conservation. *Transactions of the American Fisheries Society* 128: 854–867.
11. Baxter, G. 2002. All terrain vehicles as a cause of fire ignition in Alberta forests. *Advantage (Publication of the Forest Engineering Research Institute of Canada)* 3(44): 1-7.
12. Beazley, K., T. Snaith, F. MacKinnon, and D. Colville. 2004. Road density and the potential impacts on wildlife species such as American moose in mainland Nova Scotia. *Proceedings of the Nova Scotia Institute of Science* 42: 339-357.
13. Benítez-López, A., R. Alkemade, and P.A. Verweij. 2010. The impacts of roads and other infrastructure on mammal and bird populations: a meta-analysis. *Biological Conservation* 143: 1307-1316.
14. Beyer, H.L., R. Ung, D.L. Murray, and M.J. Fortin. 2013. Functional responses, seasonal variation and thresholds in behavioural responses of moose to road density. *Journal of Applied Ecology* 50: 286–294.
15. Birdsall, J.L., W. McCaughey, and J.B. Runyon. 2012. Roads Impact the distribution of Noxious Weeds more than restoration treatments in a lodgepole pine forest in Montana, USA. *Restoration Ecology* 20(4): 517-523.
16. Bisson, P.A., B.E. Rieman, C. Luce, P.F. Hessburg, D.C. Leed, J.L. Kershner, G.H. Reeves, R.E. Gresswell. Fire and aquatic ecosystems of the western USA: current knowledge and key questions. *Forest Ecology and Management* 213-229.

17. Boulanger J., and G.B. Stenhouse. 2014. The impact of roads on the demography of grizzly bears in Alberta. PLoS ONE 9(12). Available at: <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0115535>
18. Bowles, A.E. 1997. Responses of wildlife to noise. In *Wildlife and recreationists: coexistence through management and research*. Edited by R.L. Knight and K.J. Gutzwiller. Island Press, Washington, DC. p. 109–156.
19. Brehme, C.S., and J.A. Tracey, L.R. McClenaghan, and R.N. Fisher. 2013. Permeability of roads to movement of scrubland lizards and small mammals. *Conservation Biology* 27(4): 710–720.
20. Brody, A.J., and M.R. Pelton. 1989. Effects of roads on black bear movements in western North Carolina. *Wildlife Society Bulletin* 17: 5-10.
21. Buchanan, C.B., J.L. Beck, T.E. Bills, S.N. Miller. 2014. Seasonal resource selection and distributional response by elk to development of a natural gas field. *Rangeland Ecology and Management* 67(4): 369-379.
22. Carlson, J. P. Edwards, T. Ellsworth, and M. Eberle. 2015. National best management practices monitoring summary report. Program Phase-In Period Fiscal Years 2013-2014. USDA Forest Service. Washington, D.C.
23. Carnefix, G., and C. A. Frissell. 2009. Aquatic and Other Environmental Impacts of Roads: The Case for Road Density as Indicator of Human Disturbance and Road-Density Reduction as Restoration Target; A Concise Review. Pacific Rivers Council Science Publication 09-001. Pacific Rivers Council, Portland, OR and Polson, MT.
24. Chen, H.L., and J.L. Koprowski, Barrier effects of roads on an endangered forest obligate: influences of traffic, road edges, and gaps, *Biological Conservation* 199: 33-40.
25. Cissel, R., T. Black, and C. Luce. 2011. Legacy Roads and Trails Monitoring Project: Road Decommissioning on the Lolo Creek Watershed Clearwater National Forest. Boise, ID. 27p. https://www.fs.fed.us/GRAIP/downloads/case_studies/LegacyRoadsClearwaterNF_LoloCreek2009Decomission_FinalReport.pdf
26. Coffin, A. 2006. From roadkill to road ecology: A review of the ecological effects of roads. *Journal of Transport Geography* 15: 396-406.
27. Crist, M.R., and B. Wilmer. 2002. *Roadless Areas: The Missing Link in Conservation*. The Wilderness Society, Washington D.C.
28. da Rosa, C.A., and A. Bager. Review of the factors underlying the mechanisms and effects of roads on vertebrates. *Oecologia Australis* 17(1): 6-19.
29. Damschen, E.I., L.A. Brudvig, M.A. Burt, R.J. Fletcher, N.M. Haddad, D.J. Levey, J.L. Orrock, J. Resasco, and J.J. Tewksbury. 2019. Ongoing accumulation of plant diversity through habitat connectivity in an 18-year experiment. *Science* 365(6460): 1478-1480. <https://science.sciencemag.org/content/365/6460/1478.abstract>
30. Davenport, J., and T.A. Switalski. 2006. Environmental impacts of transport related to tourism and leisure activities. In: *The ecology of transportation: managing mobility for the environment*, editors: J Davenport and Julia Davenport. Dordrecht, Netherlands: Kluwer Academic Publishers. 333-360.
31. DellaSalla, D.A., J.E. Williams, C.D. Williams, and J.F. Franklin. 2004. Beyond smoke and mirrors: a synthesis of fire policy and science. *Conservation Biology* 18:976–986.
32. DellaSala, D., J. Karr, and D. Olson. 2011. Roadless areas and clean water. *Journal of Soil and Water Conservation*, vol. 66, no. 3. May/June 2011.

33. DeVelice, R., and J.R. Martin. 2001. Assessing the extent to which roadless areas complement the conservation of biological diversity. *Ecological Applications* 11(4): 1008-1018.
34. Edwards, P.J., F. Wood, and R. L. Quinlivan. 2016. Effectiveness of best management practices that have application to forest roads: a literature synthesis. General Technical Report NRS-163. Parsons, WV: U.S. Department of Agriculture, Forest Service, Northern Research Station. 171 p.
35. Edge, W.D., and C.L. Marcum. 1985. Movements of elk in relation to logging disturbances. *Journal of Wildlife Management* 49(4): 926–930.
36. Endicott, D. 2008. National Level Assessment of Water Quality Impairments Related to Forest Roads and Their Prevention by Best Management Practices. A Report Prepared by the Great Lakes Environmental Center for the Environmental Protection Agency, Office of Water, December 4, 2008. 259 pp.
37. Erkinaro, J., H. Erkinaro, and E. Niemelä. 2017. Road culvert restoration expands the habitat connectivity and production area of juvenile Atlantic salmon in a large subarctic river system. *Fisheries Management and Ecology*. 24: 73-81.
38. Fahrig, L., and T. Rytwinski. 2009. Effects of roads on animal abundance: an empirical review and synthesis. *Ecology and Society* 14(1): 21.
39. Foltz, R.B. N.S. Copeland, and W.J. Elliot. 2009. Reopening abandoned forest roads in northern Idaho, USA: Quantification of runoff, sediment concentration, infiltration, and interrill erosion parameters. *Journal of Environmental Management* 90: 2542–2550.
40. Forman, R. T. T., and A.M. Hersperger. 1996. Road ecology and road density in different landscapes, with international planning and mitigation solutions. Pages 1–22. IN: G. L. Evink, P. Garrett, D. Zeigler, and J. Berry (eds.), *Trends in Addressing Transportation Related Wildlife Mortality*. No. FLER- 58-96, Florida Department of Transportation, Tallahassee, Florida.
41. Foreman, R.T.T., D. Sperling, J.A. Bissonette et al. 2003. *Road Ecology – Science and Solutions*. Island Press. Washington, D.C. 504 p.
42. Furniss, M.J.; Staab, B.P.; Hazelhurst, S.; Clifton, C.F.; Roby, K.B.; Ilhardt, B.L.; Larry, E.B.; Todd, A.H.; Reid, L.M.; Hines, S.J.; Bennett, K.A.; Luce, C.H.; Edwards, P.J. 2010. Water, climate change, and forests: watershed stewardship for a changing climate. Gen. Tech. Rep. PNW-812. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 75 p.
43. Furniss, Michael J.; Roby, Ken B.; Cenderelli, Dan; Chatel, John; Clifton, Caty F.; Clingenpeel, Alan; Hays, Polly E.; Higgins, Dale; Hodges, Ken; Howe, Carol; Jungst, Laura; Louie, Joan; Mai, Christine; Martinez, Ralph; Overton, Kerry; Staab, Brian P.; Steinke, Rory; Weinhold, Mark. 2013. Assessing the vulnerability of watersheds to climate change: results of national forest watershed vulnerability pilot assessments. Gen. Tech. Rep. PNW-GTR-884. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 32 p. plus appendix.
44. Gaines, W.L., P. Singleton, and R.C. Ross. 2003. Assessing the cumulative effects of linear recreation routes on wildlife habitats on the Okanogan and Wenatchee National Forests. Gen. Tech. Rep. PNW-GTR-586. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 79 p.
45. Gelbard, J.L., and S. Harrison. 2003. Roadless habitats as refuges for native grasslands: interactions with soil, aspect, and grazing. *Ecological Applications* 13(2): 404-415.
46. Girvetz, E., and F. Shilling. 2003. Decision Support for Road System Analysis and Modification on the Tahoe National Forest. *Environmental Management* 32(2): 218–233

47. Grant, A., C.R. Nelson, T.A. Switalski, and S.M. Rinehart. 2011. Restoration of native plant communities after road decommissioning in the Rocky Mountains: effect of seed mix composition & soil properties on vegetative establishment. *Restoration Ecology* 19: 160-169.
48. Griffin, R.J. 2004. Case closed: public motorized trespass and administrative activity on closed roads in the Upper Swan, Lower Swan, and Noisy Face Geographic Units. 14 p.
49. Gucinski, M., J. Furniss, R. Ziemer, and M.H. Brookes. 2001. Forest Roads: A Synthesis of Scientific Information. Gen. Tech. Rep. PNWGTR-509. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 103 p.
Available at: <http://www.fs.fed.us/pnw/pubs/gtr509.pdf>.
50. Halofsky, Jessica E.; Peterson, David L., O'Halloran, Kathy A.; Hoffman, Catherine Hawkins, eds. 2011. Adapting to climate change at Olympic National Forest and Olympic National Park. U.S. Department of Agriculture, Forest Service Pacific Northwest Research Station Portland, Oregon General Technical Report, PNW-GTR-844. Available at: https://www.fs.fed.us/pnw/pubs/pnw_gtr844.pdf
51. Halofsky, Jessica E.; Peterson, David L., eds. 2017. Climate change vulnerability and adaptation in the Blue Mountains. Gen. Tech. Rep. PNW-GTR-939. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. p. 53-90. Available at: https://www.fs.fed.us/pnw/pubs/pnw_gtr939.pdf.
52. Halofsky, Jessica E.; Peterson, David L.; Dante-Wood, S. Karen; Hoang, Linh; Ho, Joanne J.; Joyce, Linda A., eds. 2018a. Climate change vulnerability and adaptation in the Northern Rocky Mountains. Gen. Tech. Rep. RMRS-GTR-374. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. Part 1. pp. 1–273. Available at: https://www.fs.fed.us/rm/pubs_series/rmrs/gtr/rmrs_gtr374_1.pdf.
53. Halofsky, Jessica E.; Peterson, David L.; Ho, Joanne J.; Little, Natalie, J.; Joyce, Linda A., eds. 2018b. Climate change vulnerability and adaptation in the Intermountain Region. Gen. Tech. Rep. RMRS-GTR-375. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. Part 1. pp. 1–197. Available at: https://www.fs.fed.us/rm/pubs_series/rmrs/gtr/rmrs_gtr375_1.pdf.
54. Halofsky, Jessica E.; Peterson, David L.; Ho, Joanne J. eds. 2019. Climate Change Vulnerability and Adaptation in South-Central Oregon. Gen. Tech. Rep. PNW-GTR-974. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. p. 496. Available at: https://www.fs.fed.us/pnw/pubs/pnw_gtr974.pdf.
55. Hargis, C.D., J.A. Bissonette, and D.T. Turner. 1999. The influence of forest fragmentation and landscape pattern on American martens. *Journal of Applied Ecology* 36(1): 157–172.
56. Hebblewhite, M., R.H. Munro, E.H. Merrill. 2009. Trophic consequences of postfire logging in a wolf-ungulate system. *Forest Ecology and Management* 257(3): 1053-1062.
57. Hedquist, S.L., L.A. Ellison, and A. Laurenzi. 2014. Public lands and cultural resource protection. *Advances in Archaeological Practice* 2: 298-310.
58. Hessburg, P.F., and J.K. Agee. 2003. An environmental narrative of Inland Northwest United States forests, 1800-2000. *Forest Ecology and Management* 178: 23-59
59. Holman, I.P., R.J. Nicholls, P.M. Berry, P.A. Harrison, E. Audsley, S. Shackley, and M.D.A. Rounsevell. 2005. A regional, multi-sectoral and integrated assessment of the impacts of climate and socio-economic change in the UK. Part II. Results. *Climatic Change* 71: 43-73.
60. Jalkotzy, M.G., P.I. Ross, and M.D. Nasserden. 1997. The effects of linear developments on wildlife: a review of selected scientific literature. Prepared for Canadian Association of Petroleum Producers. Arc Wildlife Services, Ltd., Calgary, AB. 115 p.

61. Jensen W.F., T.K. Fuller, and W.L. Robinson. 1986. Wolf (*Canis lupus*) distribution on the Ontario-Michigan border near Sault Ste. Marie. *Canadian Field-Naturalist* 100: 363-366.
62. Joslin, G., and H. Youmans, coordinators. 1999. Effects of recreation on Rocky Mountain wildlife: A Review for Montana. Committee on Effects of Recreation on Wildlife, Montana Chapter of The Wildlife Society. 307 p. Available at: <http://joomla.wildlife.org/Montana/index>
63. Kasworm, W.F., and T.L. Manley. 1990. Road and trail influences on grizzly bears and black bears in northwest Montana. *International Conference on Bear Research and Management* 8: 79-84.
64. Kerkvliet, J., J. Hicks, and B. Wilmer. 2008. Carbon Sequestered when Unneeded National Forest Roads are Revegetated. The Wilderness Society Briefing Memo.
65. Kolka, R.K., and M.F. Smidt. 2004. Effects of forest road amelioration techniques on soil bulk density, surface runoff, sediment transport, soil moisture, and seedling growth. *Forest Ecology and Management* 202: 313–323.
66. Lamb, C.T., G. Mowat, A. Reid, L. Smit, M. Proctor, S. Nielson, S. Boutin. 2018. Effects of habitat quality and access management on the density of a recovering grizzly bear population. *Journal of Applied Ecology* 55: 1406–1417.
67. Lee, D., J. Sedell, B.E. Rieman, R. Thurow, and J. Williams. 1997. Broad-scale assessment of aquatic species and habitats. In: An assessment of ecosystem components in the interior Columbia basin and portions of the Klamath and Great Basins. Edited by T.M. Quigley and S.J. Arbelbide. General Technical Report PNW-GTR-405. USDA Forest Service, Pacific Northwest Research Station, Portland, OR. Vol III. p. 183–196.
68. Lendrum, P.E., C.R. Anderson, R.A. Long, J.G. Kie, and R.T. Bowyer. 2012. Habitat selection by mule deer during migration: effects of landscape structure and natural-gas development. *Ecosphere* 3: 82.
69. Lendrum P.E., C.R. Anderson, K.L. Monteith, J.A. Jenks, and R.T. Bowyer. 2013. Migrating Mule Deer: Effects of Anthropogenically Altered Landscapes. *PLoS ONE*, 8. available online at: <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0064548>
70. Lloyd, R., K. Lohse, and T.P.A. Ferre. 2013. Influence of road reclamation techniques on forest ecosystem recovery. *Frontiers in Ecology and the Environment* 11(2): 75-81.
71. Loucks, C., N. Brown, A. Loucks, and K. 2003. USDA Forest Service roadless areas: potential biodiversity conservation reserves. *Conservation Ecology* 7(2): 5. Available at: <http://www.ecologyandsociety.org/vol7/iss2/art5/>
72. Logan, R. 2001. Water Quality BMPs for Montana Forests. Montana Department of Environmental Quality. Missoula, MT. 60p.
73. Lyon, L.J. 1983. Road density models describing habitat effectiveness for elk. *Journal of Forestry* 81: 592-595.
74. Luce, C.H. 1997. Effectiveness of road ripping in restoring infiltration capacity of forest roads. *Restoration Ecology* 5(3): 265-270.
75. Mace, R.D., J.S. Waller, T.L. Manley, L.J. Lyon, and H. Zuuring. 1996. Relationships among grizzly bears, roads and habitat in the Swan Mountains, MT. *Journal of Applied Ecology*. 33: 1395-1404.
76. Madej, M., J. Seney, and P. van Mantgem. 2013. Effects of road decommissioning on carbon stocks, losses, and emissions in north coastal California. *Restoration Ecology* 21(4): 439–446.
77. Mattson, D.J., S. Herrero, R.G. Wright, and C.M. Pease. 1996. Science and management of Rocky Mountain grizzly bears. *Conservation Biology* 10(4): 1013-1025.

78. McCaffery M., T.A. Switalski, and L. Eby. 2007. Effects of road decommissioning on stream habitat characteristics in the South Fork Flathead River, Montana. *Transactions of the American Fisheries Society* 136: 553-561.
79. McGurk, B.J., and D.R. Fong, 1995. Equivalent roaded area as a measure of cumulative effect of logging. *Environmental Management* 19: 609-621.
80. Mech, L.D. 1989. Wolf population survival in an area of high road density. *American Midland Naturalist* 121: 387-389.
81. Mech, L. D., S.H. Fritts, G.L. Radde, and W.J. Paul. 1988. Wolf distribution and road density in Minnesota. *Wildlife Society Bulletin* 16: 85-87.
82. Meredith, C. B. Roper, and E. Archer. 2014. Reductions in instream wood in streams near roads in the Interior Columbia River Basin. *North American Journal of Fisheries Management* 34:493-506.
83. Merrill, B.R., and E. Cassaday. 2003. Best Management Practices for Road Rehabilitation – Road – Stream Crossing Manual. California State Parks. Eureka, CA. 25p. Available at: http://www.parks.ca.gov/pages/23071/files/streamcrossingremovalbmp5_03.pdf
84. Mladenoff, D.J., T.A. Sickley, R.G. Haight, and A.P. Wydeven. 1995. A regional landscape analysis and prediction of favorable gray wolf habitat in the Northern Great Lakes region. *Conservation Biology* 9: 279-294.
85. Miller, Stephanie A.; Gordon, Sean N.; Eldred, Peter; Beloin, Ronald M.; Wilcox, Steve; Ragon, Mark; Andersen, Heidi; Muldoon, Ariel. 2017. Northwest Forest Plan—the first 20 years (1994–2013): watershed condition status and trends. Gen. Tech. Rep. PNW-GTR-932. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 74 p.
86. Moomaw William R., Masino Susan A., Faison Edward K. 2019. Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good. *Frontiers in Forests and Global Change*, Vol. 2. <https://www.frontiersin.org/article/10.3389/ffgc.2019.00027>
87. Moore, T. 2007. [unpublished draft]. National Forest System Road Trends, Trends Analysis Submitted to Office of Management and Budget. United States Department of Agriculture, Forest Service, Engineering Staff, Washington Office, Washington, DC.
88. Muñoz, P.T., F.P. Torres, and A.G. Megías. 2015. Effects of roads on insects: a review. *Biodiversity Conservation* 24: 659-682.
89. Nagy, R.C., E. Fusco, B. Bradley, J.T. Abatzoglou, and J. Balch. 2018. Human-related ignitions increase the number of large wildfires across U.S. ecoregions. *Fire* 1(4): 1-14.
90. Narayanaraj, G., and M.C. Wimberly. 2011. Influences of forest roads on the spatial pattern of wildfire boundaries. *International Journal of Wildland Fire* 20: 792–803.
91. Narayanaraj, G., and M.C. Wimberly. 2012. Influences of forest roads on the spatial pattern of human- and lightning-caused wildfire ignitions. *Applied Geography* 32: 878–888.
92. Narayanaraj, G., and M.C. Wimberly. 2013. Influences of forest roads and their edge effects on the spatial pattern of burn severity. *International Journal of Applied Earth Observation and Geoinformation* 23: 62–70.
93. National Fish, Wildlife and Plants Climate Adaptation Partnership (NFWPCAP). 2012. National Fish, Wildlife and Plants Climate Adaptation Strategy. Association of Fish and Wildlife Agencies, Council on Environmental Quality, Great Lakes Indian Fish and Wildlife Commission, National Oceanic and Atmospheric Administration, and U.S. Fish and Wildlife Service. Washington, DC.

94. Neeson, T.M., A.T. Moody, J.R. O'Hanley, M. Diebel, P.J. Doran, M.C. Ferris, T.C. Peter, B. McIntyre. 2018. Aging infrastructure creates opportunities for cost-efficient restoration of aquatic ecosystem connectivity. *28(6): 1494-1502*
95. Nelson, N., T. Black, and R. Cissel. 2010. Monitoring road treatments in the Island Park watershed. Boise, ID. 34p.
96. Noss, R.F. 2001. Beyond Kyoto: forest management in a time of rapid climate change. *Conservation Biology 15(3): 578-590.*
97. Ortega, Y.K., and D.E. Capen. 2002. Roads as edges: effects on birds in forested landscapes. *Forest Science 48(2): 381-396.*
98. Ouren, D.S., C. Haas, C.P. Melcher, S.C. Stewart, P.D. Ponds, N.R. Sexton, L. Burris, T. Fancher, and Z.H. Bowen. 2007. Environmental effects of off-highway vehicles on Bureau of Land Management lands: A literature synthesis, annotated bibliographies, extensive bibliographies, and internet resources: U.S. Geological Survey, Open-File Report 2007-1353, 225 p.
99. Pacific Watershed Associates. 2005. Erosion Assessment and Erosion Prevention Planning Project for Forest Roads in the Biscuit Fire Area, Southern Oregon. Prepared for Pacific Rivers Council and The Siskiyou Project. Pacific Watershed Associates, Arcata, California.
100. Parmesan, C. 2006. Ecological and evolutionary responses to recent climate change. *Annual Review of Ecology, Evolution, and Systematics 37: 637-669.*
101. Paton, D.G., S. Ciutu, M.S. Boyce, and M. Quinn. 2017. Hunting exacerbates the response to human disturbance in large herbivores while migrating through a road network. *Ecosphere 8(6): 1-18.*
102. Proctor, M. F., et al. 2012. Population Fragmentation and Inter-Ecosystem Movements of Grizzly Bears in Western Canada and the Northern United States. *Wildlife Monographs 180:1-46; DOI: 10.1002/wmon.6*
103. Proctor, M. F., B. N. McLellan, G. B. Stenhouse, G. Mowat, C. T. Lamb, and M. Boyce. 2018. Resource Roads and Grizzly Bears in British Columbia, and Alberta. Canadian Grizzly Bear Management Series, Resource Road Management. Trans-border Grizzly Bear Project. Kaslo, BC. Canada.
104. Prokopenko., C.M., M.S. Boyce, T. Avgar. 2017. Extent-dependent habitat selection in a migratory large herbivore: road avoidance across scales. *Landscape Ecology 32(2): 313-325.*
105. Quigley, T.M., and S.J. Arbelbide, tech. eds. 1997. An assessment of ecosystem components in the interior Columbia basin and portions of the Klamath and Great Basins: volume 1 and volume 3. Gen. Tech. Rep. PNW-GTR-405. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station.
106. Ramlow, M., C.C. Rhoades, and M.F. Cotrufo. 2018. Promoting revegetation and soil sequestration on decommissioned forest roads in Colorado, USA: A comparative assessment of organic soil amendments. *Forest Ecology and Management 427:230-241.*
107. Reynolds, K. 1999. Netweaver for EMDS user guide (version1.1); a knowledge base development system. General technical Report PNW-GTR-471. USDA Forest Service, Pacific Northwest Research Station, Portland, OR.
108. Rieman, B., D. Lee, G. Chandler, and D. Myers. 1997. Does wildfire threaten extinction for salmonids? Responses of Redband Trout and Bull Trout Following Recent Large Fires on the Boise National Forest, in Greenlee, J. M., Proceedings: First Conference on Fire Effects on Rare and Endangered Species and Habitats. Coeur d'Alene, Idaho. International Association of Wildland Fire. Fairfield, WA. p. 47-57.

109. Robichaud, P.R., L.H. MacDonald, and R.B. Foltz. 2010. Fuel management and Erosion. In: Cumulative Watershed Effects of Fuels Management in the Western United States. USDA Forest Service RMRS-GTR-231. P. 79-100. Available at: http://www.fs.fed.us/rm/pubs/rmrs_gtr231/rmrs_gtr231_079_100.pdf
110. Robinne, F.N., M.A. Parisien, and M. Flannigan. Anthropogenic influence on wildfire activity in Alberta, Canada. *International Journal of Wildland Fire* 25: 1131-1143.
111. Robinson, C., P.N. Duinker, and K.F. Beazley. 2010. A conceptual framework for understanding, assessing, and mitigation effects for forest roads. *Environmental Review* 18: 61-86.
112. Rooney, T.P. 2006. Distribution of ecologically-invasive plants along off-road vehicle trails in the Chequamegon National Forest, Wisconsin. *The Michigan Botanist* 44:178-182
113. Rowland, M.M., M.J. Wisdom, B.K. Johnson, and M.A. Penninger. 2005. Effects of roads on elk: implications for management in forested ecosystems. Pages 42-52. IN: Wisdom, M.J., technical editor, *The Starkey Project: a Synthesis of Long-term Studies of Elk and Mule Deer*. Reprinted from the 2004 Transactions of the North American Wildlife and Natural Resources Conference, Alliance Communications Group, Lawrence, KS.
114. Sampson, M.P. 2009. The effects of off-highway vehicles on the cultural resources of Red Rock Canyon State Park, California. *Proceedings of the Society for California Archaeology* 21: 190-201.
115. Sawyer, H., F. Lindzey, and D. McWhirter. 2005. Mule deer and pronghorn migration in western Wyoming. *Wildlife Society Bulletin* 33:1266-1273.
116. Sawyer, H., R.M. Nielson, F. Lindzey, and L. McDonald. 2006. Winter Habitat Selection of Mule Deer Before and During Development of a Natural Gas Field. *The Journal of Wildlife Management* 70: 396-403.
117. Schwartz, H. G., M. Meyer, C. J. Burbank, M. Kuby, C. Oster, J. Posey, E. J. Russo, and A. Rypinski, 2014: Ch. 5: Transportation. *Climate Change Impacts in the United States: The Third National Climate Assessment*, J. M. Melillo, Terese (T.C.) Richmond, and G. W. Yohe, Eds., U.S. Global Change Research Program, 130-149.
118. Selva, N., A. Switalski, S. Kreft, and P.L. Ibisch. 2015. Why Keep Areas Road-free? The importance of roadless areas. In: *Handbook of Road Ecology*, First Edition. Edited by R. van der Ree, D. J. Smith and C. Grilo. John Wiley and Sons, Ltd., NJ. Pgs 16-26.
119. Semlitsch, R.D., T.J. Ryan, K. Hamed, M. Chatfield, B. Brehman, N. Pekarek, M. Spath, and A. Watland. 2007. Salamander abundance along road edges and within abandoned logging roads in Appalachian forests. *Conservation Biology* 21: 159-167.
120. Seney, J., and M.A. Madej. 2015. Soil carbon storage following road removal and timber harvesting in redwood forests. *Earth Surface Processes and Landforms* 40: 2084-2092.
121. Shilling, F., J. Boggs, and S. Reed. 2012. Recreational System Optimization to Reduce Conflict on Public Lands. *Environmental Management* 50: 381–395.
122. Simmers, S.M., and S.M. Galatowitsch. 2010. Factors affecting revegetation of oil field access roads in semiarid grassland. *Restoration Ecology* 18: 27-39.
123. Sosa-Pérez, G., and L.H. MacDonald. 2017. Reductions in road sediment production and road-stream connectivity from two decommissioning treatments. *Forest Ecology and Management* 398; 116–129.
124. Spangler, J.D., and A. Yentsch. 2008. Final Report: Baseline Site Condition and Vandalism Assessments of Archaeological Sites in Tenmile Canyon, Grand County. Ogden, Utah: Colorado Plateau Archaeological Alliance.

125. Strauch, RL. (2014a) Mt. Baker-Snoqualmie National Forest Sustainable Roads System Strategy. Climate Change Appendix. U.S. Department of Agriculture, Forest Service. Available at: https://cascadiapartnerforum.org/wp-content/uploads/2015/01/RStrauch_MBSNF_SustainableRoadsSystem_ClimateChangeReport_2014.pdf
126. Strauch RL, Raymond CL, Hamlet AF. (2014b) Climate change, hydrology, and access in the North Cascade Range. In: Raymond CL, Peterson DL, and Rochefort RM (eds) Climate change vulnerability and adaptation in the North Cascade Region, Washington. Gen Tech Rep PNW-GTR-892. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station
127. Strauch, RL & C.L. Raymond & R.M. Rochefort & A.F. Hamlet & C. Lauver. (2015). Adapting transportation to climate change on federal lands in Washington State, U.S.A. Dordrecht: Springer Science-Business Media. Available at: <https://cascadiapartnerforum.org/wp-content/uploads/2015/03/Strauch-et-al.-2015.pdf>
128. Strittholt, J., and D. Dellasala. 2001. Importance of Roadless Area Conservation in Forested Ecosystems: Case Study of the Klamath-Siskiyou Region of the United States. In *Conservation Biology* 15(6): 1742-1754.
129. Switalski, T.A., J.A. Bissonette, T.H. DeLuca, C.H. Luce, and M.A. Madej. 2004. Benefits and impacts of road removal. *Frontiers in Ecology and the Environment*. 2(1): 21-28. Available at: http://www.fs.fed.us/rm/pubs_other/rmrs_2004_switalski_t001.pdf
130. Switalski, T.A., and C.R. Nelson. 2011. Efficacy of road removal for restoring wildlife habitat: black bear in the Northern Rocky Mountains, USA. *Biological Conservation* 144: 2666-2673.
131. Switalski, T.A., and A. Jones. 2012. Off-road vehicle best management practices for forestlands: A review of scientific literature and guidance for managers. *Journal of Conservation Planning* 8: 12-24.
132. Switalski, T.A. 2018. Off-highway vehicle recreation in drylands: A literature review and recommendations for best management practices. *Journal of Outdoor Recreation and Tourism*. 21: 87-96.
133. Syphard, A.D., V.C. Radeloff, J.E. Keeley, T.J. Hawbaker, M.K. Clayton, S.I. Stewart, and R.B. Hammer. 2007. Human influence on California fire regimes. *Ecological Applications* 17 (5): 1388–1402.
134. Tarvainen, O., Tolvanen, A. Healing the wounds in the landscape—reclaiming gravel roads in conservation areas. *Environ Sci Pollut Res* 23, 13732–13744 (2016). <https://doi.org/10.1007/s11356-015-5341-6>
135. Thiel, R.P. 1985. The relationships between road densities and wolf habitat in Wisconsin. *American Midland Naturalist* 113: 404-407.
136. Trombulak S., and C. Frissell. 2000. Review of Ecological Effects of Roads on Terrestrial and Aquatic Communities. *Conservation Biology* 14(1): 18-30.
137. USDA Forest Service. (USFS) 1998. National Forest System Roads and Use. Available online at: http://www.fs.fed.us/eng/road_mgt/roadsummary.pdf.
138. USDA Forest Service. 1996. Status of the interior Columbia basin: summary of scientific findings. Gen. Tech. Rep. PNW-GTR-385. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station; U.S. Department of the Interior, Bureau of Land Management. 144 p.
139. USDA Forest Service. 1999. Roads Analysis: Informing Decisions about Managing the National Forest Transportation System. Misc. Rep. FS-643. Washington, D.C.: USDA Forest Service. 222 p. Available at: http://www.fs.fed.us/eng/road_mgt/DOCSroad-analysis.shtml
140. USDA Forest Service 2000. Forest Service Roadless Area Conservation Rule Final Environmental Impact Statement. Washington, D.C. 656 pgs.

141. USDA Forest Service. 2001. Final National Forest System Road Management Strategy Environmental Assessment and Civil Rights Impact Analysis. U.S. Department of Agriculture Forest Service Washington Office, January 2001.
142. USDA Forest Service. 2008. Tongass National Forest Amendment to the Land and Resource Management Plan Record of Decision and Final EIS. Available online at: Available at: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5367433.pdf
143. USDA Forest Service. 2010. Water, Climate Change, and Forests: Watershed Stewardship for a Changing Climate, PNW-GTR-812, June 2010, 72 p.
Available at: http://www.fs.fed.us/pnw/pubs/pnw_gtr812.pdf.
144. USDA Forest Service. 2011a. Adapting to Climate Change at Olympic National Forest and Olympic National Park. Forest Service Pacific Northwest Research Station General Technical Report, PNW-GTR-844, August 2011.
Available at: http://www.fs.fed.us/pnw/pubs/pnw_gtr844.pdf
145. USDA Forest Service. 2011b. National Roadmap for Responding to Climate Change. US Department of Agriculture. FS-957b. 26 p.
Available at: http://www.fs.fed.us/climatechange/pdf/Roadmap_pub.pdf.
146. USDA Forest Service. 2012. National Best Management Practices for Water Quality Management on National Forest System Lands. Report# FS-990. 177p. Available at: http://www.fs.fed.us/biology/resources/pubs/watershed/FS_National_Core_BMPs_April2012.pdf
147. USDA (US Department of Agriculture). 2014. Strategic plan FY 2014-2018. Washington, D.C. 48p.
148. USDA Forest Service. 2018. U.S. Forest Service Transportation Resiliency Guidebook. Washington, D.C. 94 p. Prepared by: U.S. Department of Transportation John A. Volpe National Transportation Systems Center.
Available at: <https://www.fs.fed.us/eng/transp/documents/pdf/USESTransportationResiliencyGuideBook.pdf>
149. USDA Forest Service. 2019. Forest Service Geodata Clearinghouse. Accessed 9/18/19. Available at: <https://data.fs.usda.gov/geodata/edw/datasets.php>
150. USDI Fish and Wildlife Service. 1999. Endangered and Threatened Wildlife and Plants; Determination of Threatened Status for Bull Trout in the Coterminous United States; Final Rule. Federal Register Volume 64, Number 210 (Monday, November 1, 1999). p. 58922.
151. USDI National Park Service. 2010. Climate Change Response Strategy. National Park Service Climate Change Response Program, Fort Collins, Colorado.
Available at: https://www.nps.gov/subjects/climatechange/upload/NPS_CCRS-508compliant.pdf.
152. USFWS, Nevada Fish and Wildlife Office. 2007. 12-Month Finding on a Petition to List the Sand Mountain Blue Butterfly (*Euphilotes pallescens* ssp. *arenamontana*) as Threatened or Endangered with Critical Habitat. Federal Register, Vol. 72, No. 84. See pages 24260-61.
153. USDOT John A. Volpe National Transportation Systems Center. 2016. Volpe Travel Analysis Subpart A Review - Summary of Observations DRAFT
154. Van der Ree, R., D.J. Smith, C. Grilo (Eds.). 2015. Handbook of Road Ecology. Wiley-Blackwell, Hoboken, NJ. 552 pgs.
155. Van Dyke, F.G., R.H. Brocke, H.G. Shaw, B.B Ackerman, T.P. Hemker, and F.G. Lindzey. 1986. Reactions of mountain lions to logging and human activity. *Journal of Wildlife Management*. 50(1): 95–102.

156. Wasser, S.K., K. Bevis, G. King, and E. Hanson. 1997. Noninvasive physiological measures of disturbance in the northern spotted owl. *Conservation Biology* 11(4): 1019–1022.
157. Wemple, B.C., F.J. Swanson, and J.A. Jones. 2001. Forest Roads and geomorphic process interactions, Cascade Range, Oregon. *Earth Surface Process and Landforms* 26: 191-204. Available at: <http://andrewsforest.oregonstate.edu/pubs/pdf/pub2731.pdf>
158. Wisdom, M.J., R.S. Holthausen, B.C. Wales, C.D. Hargis, V.A. Saab, D.C. Lee, W.J. Hann, T.D. Rich, M.M. Rowland, W.J. Murphy, and M.R. Eames. 2000. Source habitats for terrestrial vertebrates of focus in the interior Columbia basin: Broad-scale trends and management implications. Volume 1 – Overview. Gen. Tech. Rep. PNW-GTR-485. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station.
159. Wydeven, A.P, D.J. Mladenoff, T.A. Sickley, B.E. Kohn, R.P. Thiel, and J.L. Hansen. 2001. Road density as a factor in habitat selection by wolves and other carnivores in the Great Lakes Region. *Endangered Species Update* 18(4): 110-114.
160. Yang, J., H.S. He, S.R. Shifley, and E.J. Gustafson. 2007. Spatial patterns of modern period human-caused fire occurrence in the Missouri Ozark Highlands. *Forest Science* 53: 1–15.

POLICY PRIMER

WATERSHED CONDITION FRAMEWORK SYNOPSIS AND REVIEW

By Adam Rissien

For years Wildlands CPR has urged the Forest Service to implement policies that focus on restoring whole watersheds in order to improve water quality as well as aquatic and terrestrial habitats. It seems our efforts are paying dividends: the USDA's current strategic plan makes watershed restoration a core objective for the Forest Service. In response the agency created the Watershed Condition Framework (WCF), which fundamentally changes its restoration approach.

The previous agency paradigm was to treat the worst watershed problems through small projects, resulting in scattered, uncoordinated activities that rarely achieved whole watershed restoration. The WCF represents a more holistic approach and a new way to plan and conduct improvement and maintenance projects across entire watersheds rather than in piecemeal fashion. This marks a significant gain, and while certainly not perfect, demonstrates a change in agency priorities that was long overdue.

Overview

The Forest Service describes the WCF as "a comprehensive approach for classifying watershed condition, proactively implementing integrated restoration in selected watersheds on national forests and grasslands, and tracking and monitoring outcome-based program accomplishments for performance accountability." (WCF p. 1).

In short, the WCF's goal is to maintain or improve whole watersheds; it does so through a six-step process that classifies current conditions and prioritizes watersheds in need of restoration. It also requires development and implementation of action plans followed by monitoring to determine the plans' effectiveness. The WCF describes each step:

- Step A:** Classify the condition of all 6th-level watersheds in the national forest by using existing data layers, local knowledge, and professional judgment.
- Step B:** Prioritize watersheds for restoration: establish a small set of selected watersheds for targeted improvement equivalent to a 5-year program of work.
- Step C:** Develop watershed restoration action plans that identify comprehensive project-level improvement activities.
- Step D:** Implement integrated suites of projects in select watersheds.
- Step E:** Track restoration accomplishments for performance accountability.
- Step F:** Verify accomplishment of project activities and monitor improvement of watershed and stream conditions. (WCF p. 5)

The WCF is designed to work within existing budgets, use GIS technology with quantitative measures when possible, and focus on factors that have the greatest influence on watershed conditions, [Watershed Condition Class Technical Guide, p. 4 (hereafter: "Tech Guide")]. Ultimately, the WCF's goal is to return areas to a more natural, pristine state with high watershed functionality (e.g. integrity).



It should come as no surprise: wilderness watersheds (like the Selway River) contain the most pristine water in our national forests. Photo by Dan Funsch.

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Watershed Condition Classification

The framework's crux rests upon the first step, which assigns a condition class using a one to three scale, where (1) means the watershed is functioning properly, (2) the watershed is at risk and (3) indicates it is impaired. "The Watershed Condition scores are tracked to one decimal point... Class 1 = scores of 1.0 to 1.66; Class 2 = scores >1.66 and <2.33, and Class 3 = scores from 2.33 to 3.0," (Tech Guide, p.12). These classifications are central to the framework since forest officials need to show success by moving watersheds up to a higher quality condition class.

In determining the classification rankings, the WCF uses four general process categories. Additionally, each category has corresponding indicators with attributes that most influence watershed conditions. The following table shows each category with the percent it is weighted in calculating scores, along with each indicator and its corresponding attributes.

Watershed Condition Indicators - (12 Indicator Model)

Aquatic Physical (weighted 30%)	
Indicator	Attribute(s)
Water Quality	Impaired waters (303d listed), Water quality problems (not impaired)
Water Quantity	Flow characteristics
Aquatic Habitat	Habitat fragmentation, Large woody debris, Channel shape & function
Aquatic Biological (weighted 30%)	
Aquatic Biota	Life form presence, Native species, Exotic and/or invasive species
Riparian/Wetland Vegetation	Vegetation condition
Terrestrial Physical (weighted 30%)	
Roads and Trails	Open road density, Road maintenance, Proximity to water, Mass wasting
Soils	Productivity, Erosion, Contamination
Terrestrial Biological (weighted 10%)	
Fire Regime or Wildfire	Wildfire condition class OR Wildfire effects
Forest Cover	Loss of forest cover
Rangeland Vegetation	Vegetation condition
Terrestrial Invasive Species	Extent & rate of spread
Forest Health	Insect & disease, Ozone

(Adapted from the Tech Guide, p. 11)

The Forest Service derives condition class scores by first assigning a 1, 2 or 3 for each attribute based on existing data; officials may decide a specific attribute is not applicable and forego assigning a score. Next, all attributes are added and averaged to derive a score for the corresponding indicator, and then indicator scores for each process category are summed and averaged as well. Finally, each of the four category's scores are averaged together based on their assigned weights. It is important to note that pre-existing data, not new site-specific analysis, is the foundation of this process. Therefore, scores can be adjusted based on professional expertise and judgments.

Next Steps

Looking back at each of the six steps listed above, all national forests have completed Step A (the classification process). Individual forests are currently selecting priority watersheds for improvement or maintenance (Step B) based, in part, on the resulting condition class scores. However, forests can only choose a limited number of priority watersheds since activities must fit within current budget levels and be finished within 5 years (WCF p. 11). Those activities become essential projects in priority watershed action plans that each forest must develop (Step C) to improve condition class scores. Step D involves actually implementing these action plans, which will take several years since projects must still go through appropriate environmental analysis. It would not be unusual to anticipate a 5-year or longer timeframe from analysis through completion. Once projects are finished, the forest will record accomplishments in its internal databases (Step E) to track project completion and changes in watershed condition classes.

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Lastly, in Step F, the WCF proposes a two-tiered approach for verifying and monitoring effectiveness. Tier 1 is performance monitoring — an administrative verification of condition classes to determine if they were properly assigned. This is done by annually reviewing a sample of priority watersheds and associated projects to judge if they can reasonably be expected to improve conditions. Tier 2 addresses effectiveness monitoring — the agency will monitor watersheds in detail to measure improvement on the ground. Both performance and effectiveness monitoring can only take place upon completion of all essential projects in the priority watershed action plan, so it will be some time before verification reports become available.



A non-functional culvert diverts water away from the creek and down a road. Photo by Adam Switalski.

WCF Concerns

While the WCF represents a paradigm shift toward holistic watershed improvement, significant shortcomings still exist. We are most concerned about potential biases, problems with monitoring/tracking, and specific issues related to road/trail density and road/stream interactions.

Biases

Forest officials are under pressure to show results so it's not unreasonable to expect some watersheds will be chosen as priorities for the sake of expediency. For example, the WCF defines five different cost categories, ranging from under \$100,000 to over \$15 million. Managers must estimate the total cost for improving the watershed, which includes environmental analysis as well as implementation. It is highly likely the agency will prioritize watersheds that require less expensive work, and thus fall into the least expensive categories. Watersheds that require a significant amount of road reclamation or culvert work are not likely to fare well in such a scenario.

Additionally, officials may have a bias because forests are only credited when a watershed moves from one condition class to another (a 3 to 2, or a 2 to 1) even though scores are calculated in decimal points. Some officials may be tempted to choose priority watersheds right on the upper edge of a class score since moving it to an improved condition would be easier. For example, the score for condition class 2 ranges from 1.66 – 2.33, so if a watershed has a 1.72 score it will be easier to move it to a condition class 1 as compared to a score of 2.29.

Tracking success and monitoring

The WCF directs managers to record improvements in condition classes upon completion of all essential projects in the priority watershed action plan. One glaring problem with this approach is that condition classes will move before managers actually verify the project results. *In other words, moving watershed condition classes is a paper exercise based on completing all essential projects from the priority watershed action plan instead of whether or not those projects actually improved watershed conditions.*

It is understandable that the Forest Service would want to demonstrate the WCF's success, but the agency should have a multi-tiered approach both for crediting managers in order to reduce the potential for bias, and to actually track whether watersheds are improving based on effectiveness monitoring. To measure success, managers should get credit at three stages: one for applying project-specific treatments; next for completing all essential projects within a priority watershed action plan; and then for actually moving a watershed condition class after effectiveness monitoring verifies the improved watershed conditions. A watershed should not be moved to a new condition class until actual improvements are verified on the landscape. That said, we recognize that some treatments, including road reclamation, could take years to change water quality measurements like sedimentation.

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Roads/Trails and the WCF

Aside from concerns with how the WCF tracks improvements to condition classes and the potential for bias in choosing priority watersheds, there are problems with specific attributes among key indicators, most notably the roads and trails indicator. For roads and trails, the FS is using four attributes to assess condition: open road density, road maintenance, proximity to water and mass wasting. These attributes have some shortcomings, for example:

- ▶ total road density should be listed instead of open road density
- ▶ in addition to proximity to water, the agency should be assessing the number/presence of road/stream crossings
- ▶ in addition to mass wasting, the agency should be assessing the percent of road miles sited on steep slopes, as all soil types are not at risk of mass wasting, but might still experience significant failures due to slope steepness.

Overall, however, the road/trail attribute is a step in the right direction, and the WCF Condition Classification Technical Guide includes an appendix with additional, helpful guidance. Still, here are examples of how two of these attributes might be problematic.

Road/trail density

Looking at Figure 1, the chart reads “Open Road Density” for the attribute label, yet the description includes “linear features.” In fact, additional guidance states, “for the purposes of this reconnaissance-level assessment, the term “road” is broadly defined to include roads and all linear features on the landscape that typically influence watershed processes and conditions in a manner similar to roads,” (Tech Guide, p. 43). This section explains that even closed roads (with or without a closure order) should be included if they are still hydrologically connected to the watershed. However it does not allow an on-the-ground assessment to verify this, so a manager would either have to assume that all

closed roads are (or are not) hydrologically connected to the stream, or would have to know which specific roads are problematic. Other linear features in the density calculation can include temporary roads and motorized trails. This latter category is especially important given that some forests have renamed hundreds of miles of roads as trails without ever physically treating them to reduce impacts. In addition, many motorized trails function as roads ecologically, even if they were never built to convey cars.

Unfortunately this clarifying guidance is in an appendix, not in the chart that provides the initial overview, thus managers could have included only open, system roads in density calculations rather than all linear features. Since calculations for watershed condition classes are already finished, there is limited opportunity to go back and ensure each forest applied the additional guidance, especially since there was no public review of condition class calculations. This is especially concerning

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Figure 1. Road and Trail Condition

6. Road and Trail Condition Indicator	The density and distribution of roads and linear features within the watershed indicates the hydrologic regime is substantially intact and unaltered.	The density and distribution of roads and linear features within the watershed indicate there is a moderate probability that the hydrologic regime is substantially altered.	The density and distribution of roads and linear features within the watershed indicate there is a higher probability that the hydrologic regime (timing, magnitude, duration, and spatial distribution of runoff flows) is substantially altered.
Attributes	GOOD (1) Functioning Properly	FAIR (2) Functioning at Risk	POOR (3) Impaired
Open Road Density	Default road/trail density: < 1 mi/mi ² , <u>OR</u> a locally determined threshold for good conditions supported by Forest Plans or analysis and data.	Default road/trail density: 1 - 2.4 mi/mi ² , <u>OR</u> a locally determined threshold for fair conditions supported by Forest Plans or analysis and data.	Default road/trail density: >2.4 mi/mi ² , <u>OR</u> a locally determined threshold for poor conditions supported by Forest Plans or analysis and data.

(WCF Condition Class Technical Guide, p. 43)

because the WCF directs that reassessment of condition classes be updated annually, but only for select watersheds that may have shown significant improvement or changes due to a natural event like fire or flood. More comprehensive recalculations for all watershed conditions are supposed to occur every five years, but budget constraints may preclude this. Therefore, faulty calculations that don't give appropriate emphasis to the stress roads cause on aquatic and hydrologic conditions could persist for years.

Proximity to water

While our concerns with the open road density attribute relate to a lack of clarity, more troubling is how the WCF measures the "proximity to water" attribute. For a good score (functioning properly) the WCF directs, "No more than 10% of road/trail length is located within 300 feet of streams and water bodies or hydrologically connected to them," (Tech Guide, p. 43). But this particular language, though perhaps well-intended, could actually work as a disincentive to remove roads or other linear features that are not close to water. Basically, if roads are removed outside of the 300-foot streamside buffer zone to reduce road density, for example, the percent of roads within the buffer zone could increase, which could downgrade the watershed condition.

To explain further, consider the following scenario, as shown in Figure 2: A forest road follows a creek up a watershed and then climbs up a mountainside. One mile of the road (out of ten) is within 300ft of a stream (equaling 10% of the road length). Managers

decide to remove 5 miles of roads in the headwaters of the watershed (not within 300ft of the stream) in order to improve the watershed while leaving the lower stream-side section of road in place. The WCF calculation now changes to one mile of road out of five that is within 300ft of a stream with the result that now 20% of the road is in proximity to the stream. At 20%, the area is reclassified as functioning at risk - even though the road length was cut in half and there was no further impact to the stream. So while the road density calculation decreased, the percent of road next to the stream increased, effectively canceling the gains made by removing part of the road. To fix this problem and more accurately measure the proximity to water attribute, the WCF should use the percent of **stream miles** within 300ft of a road rather than the other way around.

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Figure 2. Proximity to Water Attribute Example

This example of a hypothetical ten-mile road shows how the "proximity of roads to streams" attribute can backfire. As currently defined, the WCF measures the percent of road miles within 300 ft of a stream, instead of the reverse.

1 road mile/10 road miles = 10%

The WCF considers 10% as functioning properly (good)

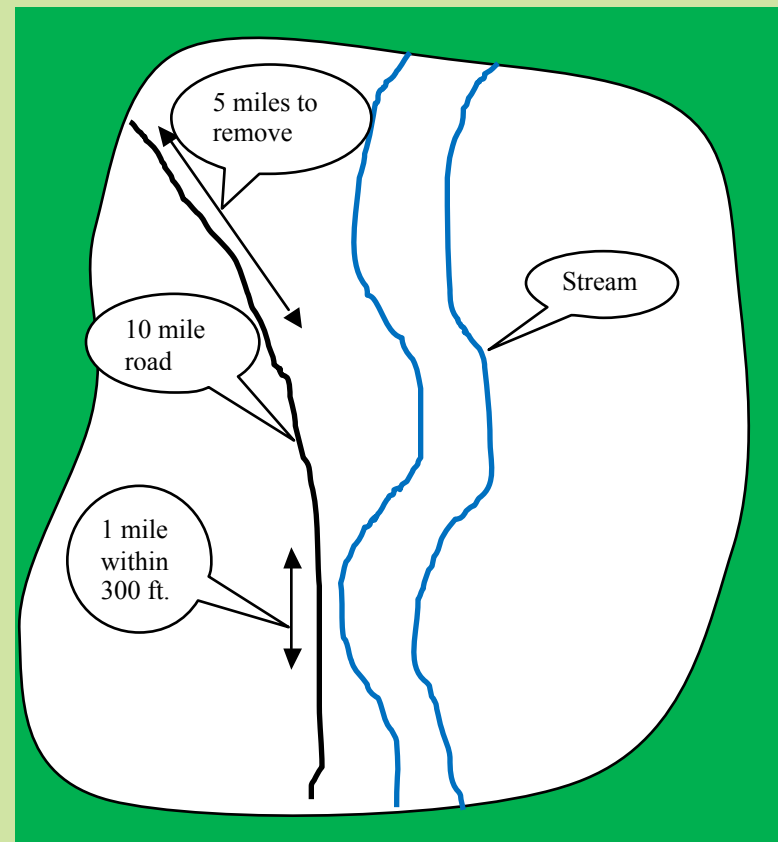
If a project removes 5 miles of road that is not within 300 ft of a stream, then the calculation becomes:

1 road mile /5 road miles = 20%

The WCF considers 20% as functioning at risk (fair)

So, even though the watershed condition was improved by reducing the road density, the percent of the road within 300 ft of the stream *increased*.

To fix this, the attribute should use the percent of stream miles within 300 ft of a road, not percent of road miles within 300 ft of a stream.



Conclusion

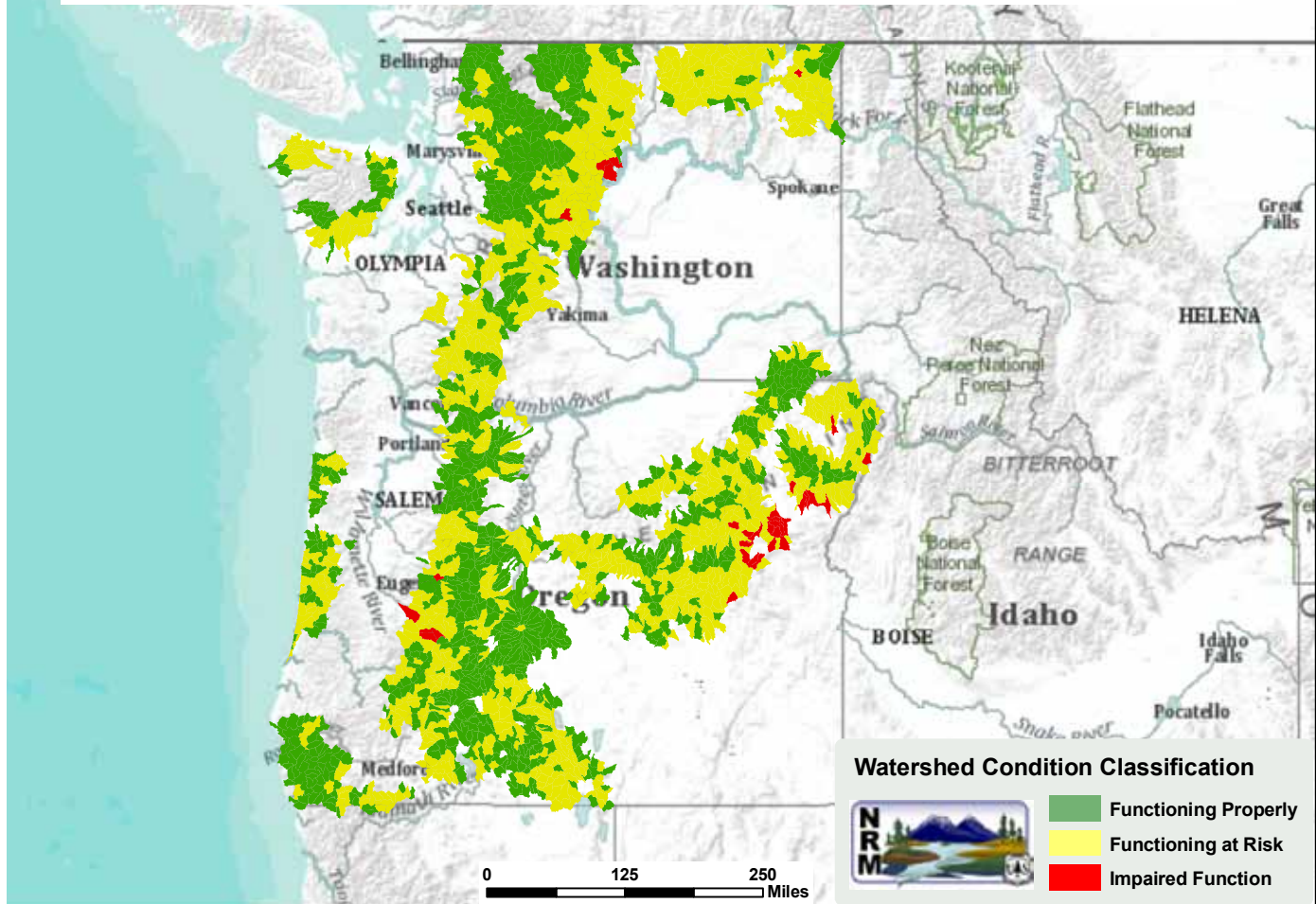
The WCF is a huge step in the right direction and shows the Forest Service is planning to walk its talk. Nonetheless, it has several shortcomings that could reduce its effectiveness on the ground. Specifically, it would be helpful if each region could verify that calculations for indicators and attributes were informed by the additional guidance, and class scores adjusted where needed. In addition, while it makes sense to choose watersheds that can realistically be improved, and possibly even to prioritize some watersheds that could reach a high level of function quickly, the prioritization process should not be entirely con-

strained by budgets and timelines. And on the reporting side, the agency should adopt a multi-tiered approach for documenting accomplishments. Finally, changes to condition classes should be based on the verification of each project's effectiveness in addition to the completion of all essential projects.

Nonetheless, the Forest Service deserves credit not only for creating the WCF but for already implementing the first step and assigning condition classes to all watersheds. Their initial map, unsurprisingly, seems to show that most high quality watersheds are

largely situated in roadless and wilderness areas, providing further justification for protected areas. But there are five more steps yet to complete, and with each new phase the agency will come closer to improving watershed health on the forests. According to recent conversations, they should be identifying priority watersheds before September 30. They also want to engage the public in some way in that process, so it would be good to contact your local forest about their process. Overall, the Watershed Condition Framework provides the opportunity to restore whole watersheds, but it will need careful monitoring and adjustments to ensure its success.

USDA Forest Service Watershed Condition Classification - Region 6
Ratings based on assessments of National Forest System land in sixth-level watersheds
MAY 12, 2011





Apache-Sitgreaves National Forests



AZ Alpine Trail – Alpine Open House

August 29, 2023

Fact Sheet:

- The AZ Alpine Trail in concept is a multi-modal, but primarily off road (OHV) motorized trail between Payson, AZ and Hannagan Meadow, near Alpine, AZ (approximately 700-800 miles long).
- The proposed location of the trail is primarily on existing motorized trails and forest roads on the Tonto, Coconino and Apache-Sitgreaves National Forests.
 - All routes considered apart of the “trail” will be approved by the Forest Service and have gone through the NEPA process.
 - Any new routes that will be added to the system and trail will go through the NEPA process.
- Arizona Alpine Trail, Inc. is an Arizona 501 (c)(3) non-profit corporation who’s mission is “to develop, maintain, document, and promote a trail system that can be used by OHV off-road enthusiasts to explore areas in Eastern Arizona while encouraging tourist development in the towns connected to the trail system” – that trail system being the AZ Alpine Trail.
- Arizona Alpine Trail, Inc. received a grant, effective June 23, 2023, for the development of a Master Trail Plan for the AZ Alpine Trail.
 - This grant was funded by Arizona State Parks and Trails.
- The Master Trail Plan will lay the groundwork for future development of the trail to improve the outdoor off highway experience of the White Mountains.
- The Master Trail Planning process is just beginning and will entail future public outreach and engagement opportunities as the development of the AZ Alpine Trail concept is put into action.
- The USDA Forest Service and many other state and local entities are working corporation with Arizona Alpine Trail, Inc. in the development of the AZ Alpine Trail and Master Trail Plan.

For more information visit Arizona Alpine Trail, Inc. website: [Your Gateway to Eastern Arizona Trails \(azalpinetrail.org\)](http://Your Gateway to Eastern Arizona Trails (azalpinetrail.org))

Additional information will be posted on the Forest Service website as appropriate, such as when we are in the NEPA process for a proposed segment. [Apache-Sitgreaves National Forests - Home \(usda.gov\)](http://Apache-Sitgreaves National Forests - Home (usda.gov))