CASCADE FOREST CONSERVANCY
CONNECT • CONSERVE • EXPLORE
Formerly Gifford Pinchot Task Force
Main: 4506 SE Belmont Street, Suite 230A, Portland, OR 97215 • 2700 E Evergreen Boulevard, Vancouver, WA 98661 • (503) 222-0055 • www.cascadeforest.org

October 11, 2016

Via email to:
comments-pacificnorthwest-giffordpinchot-mtadams@fs.fed.us

Erin Black
2455 Hwy 141
Trout Lake, WA 98650

Re: Upper Lewis River Roads Pilot Project EA

Dear Erin Black:

Thank you for the opportunity to comment on the Upper Lewis River Roads Pilot Project Environmental Assessment (EA). We are pleased to see this important aspect of management given priority. Closing unneeded roads and effectively blocking unclassified routes in the project area, as outlined in the EA, will have positive impacts on water quality, wildlife habitat, invasive plant control, the U.S. Forest Service budget, and forest recreation opportunities such as hiking, snowshoeing, cross-country skiing, mushroom gathering, camping, and exploring secluded forest locations. While the EA is a step in the right direction in creating a more sustainable road system and reducing negative impacts on habitat and recreation, the plans to close or decommission roads are insufficient. The Upper Lewis River Roads Pilot Project should close or decommission more roads, as we will outline in more detail below.

I. Road density affects habitat quality

Both aquatic and terrestrial species benefit from lower road densities. The suggested maximum density of 3 miles per square mile for aquatic health[1] and 2.6 miles per square mile for wildlife habitat[2] is surpassed in several of the sub-basins of this watershed. Removing 17 miles of forest roads, as described in the EA, is a step in the right direction, but a more significant portion of road miles should be closed and decommissioned to reach important benchmarks for habitat and water quality. Only a very small portion of the road miles in the area are being considered in this proposal (see Table 1), with decommissioning accounting for an average of 1.8% and closing actions accounting for an average of 5.8% of the total road miles of the subwatersheds of the main project area. Considering the large density of roads in the Gifford Pinchot National Forest (GPNF) relative to habitat benchmarks and road densities of other forests, more significant steps

[1] "Road densities within a subbasin that exceed 3.0 miles per square mile of area are viewed as "red flags" and indicate where road related problems are most likely to occur….Riparian reserve aquatic habitat is adversely affected by each instance where a road crosses a stream. The flow of fish, LWD, and sediment can be interrupted, i.e. the habitat becomes fragmented. The degree of this fragmentation/impact can be gauged (and sub-basins can be compared) by the number of road/stream crossings per mile of stream length." –Lower Lewis River Watershed Analysis at 48.

[2] "All the terrestrial risk criterion are related to a road density within a certain area for a particular species, set of species and special habitats. For most of these individual criteria, the road density attributing to a high risk was greater than 2.6 road miles per square mile area." –Draft Travel Analysis Plan for the Gifford Pinchot National Forest at 26.

should be taken to lessen road miles. As outlined through agency publications, forest roads "may cause increased frequency of flooding and landslides, increased stream sedimentation, and associated reductions in fish habitat productivity", as well as "fragmentation and degradation of habitat" and "reductions in travel corridors of species with large home ranges." 63 Fed. Reg. 4350, 4350 (Jan. 28, 1998). It is also noted that roads may also "begin or accelerate the invasion of exotic plant species that ultimately displace native species." The Middle Lewis River Watershed Analysis states:

> The effects of fragmentation may be compared by using an index based upon the number of road crossings over streams per unit of stream length in each sub-basin. Sub-basins 06B, 06I, 06J, 06S, 06Y, 06Z, and 08J (Curly Creek, Copper Creek, Middle Falls/Lewis River, Little Creek, Spencer Creek, Sidewalls Curly/Rush, Drift Creek) were within the highest one-quarter of the values which indicates they have received the most intense degree of habitat fragmentation caused by roads. Sub-basin 06Z (Sidewalls Curly/Rush) had the highest value of 3.1. This small watershed (1100 acres) with only 3.1 miles of stream had 10 stream crossings. The aquatic fragmentation index value is 1.28 over the entire watershed, indicating more than one crossing for each mile of stream. (Middle Lewis River Watershed Analysis)

The EA for the Upper Lewis Roads Pilot Project highlights only 4.3 miles of road for decommissioning and 13 miles for transition to Maintenance Level 1 (ML 1). We recommend using this opportunity to make a greater positive impact on the sustainability of the road network and the surrounding ecosystems by increasing the amount of roads being decommissioned. The Middle Lewis River Watershed Analysis (1995) identifies several sub-basins in the project area as "priority" areas for road decommissioning. These include Curly Creek, Meadow Creek/Lone Butte, Skookum Meadow/Big Creek, Lower Rush Creek, Front Wall Tributaries, Big Creek, Little Creek, and Sidewalls Curly/Rush. We also hope to see a greater subset of roads being converted to the ML 1 category. Similar value can be obtained by converting ML 2 and ML 3 roads to ML 1.

In summary, the degradation of aquatic function and health, the impacts to wildlife and plant species, the economic and ecological repercussions of high flow events and landslides, the cost of a large road system, and the cumulative effects of each of these issues at the watershed scale are critical issues to consider when planning for roads management. We ask that a more substantial effort be made to lessen the amount of open roads in the project area, thereby improving ecosystem function, enhancing the experience of forest users, and moving toward a more manageable and affordable road system.

Table 1. Road miles and percentages of proposed road closure and decommissioning for the main subwatersheds in the project area.

Subwatershed name	Miles of existing road	Proposed miles of road closure	Proposed miles of road decommission	Percentage of road closure	Percentage of road decommissioning
Big Creek	40.44	2.3	0.3	5.7%	0.7%
Curly Creek	36.38	3.8	0.6	10.4%	1.6%
Little Creek	51.13	3.6	0.7	7.0%	1.4%
Rush Creek	50.63	0.6	2.3	1.2%	4.5%
Headwaters Wind River	62.01	2.8	0.4	4.5%	0.6%

II. Climate resilience and wildlife connectivity

The existence, size, and location of roadless areas heavily influence habitat connectivity for both aquatic and terrestrial species, which is a critical consideration in the context of changing plant and animal distributions as a result of climate change. Roadless areas offer benefits in the form of contiguous habitat and corridors that support broad ecosystem function. Effective habitat connectivity increases ecosystem resilience in the face of disturbance and threats. As species move in response to changing climate patterns, the decoupling of species relationships and the added stressors of various climate impacts will put many terrestrial and aquatic species at risk. Larger and more strongly protected roadless areas will be increasingly important for the long-term security of the wildlife species of the GPNF.

To examine the current location of roadless areas in the subwatersheds of the project area and identify where opportunities exist to support further protections, we have mapped the inventoried and uninventoried roadless areas. Inventoried Roadless Areas (IRA) are federally designated areas identified and mapped in accordance with the Roadless Area Conservation Final Rule, commonly referred to as the "2001 Roadless Rule." These undeveloped areas, usually greater than 5,000 acres, met the minimum criteria for wilderness consideration under the Wilderness Act and were inventoried during the Roadless Area Review and Evaluation (RARE) or other similar Forest Service assessments. IRAs carry stronger protections due to the value they offer in terms of habitat, recreation, and native biodiversity. Uninventoried roadless areas are either roadless areas that were not inventoried during the RARE or other Forest Service assessments or areas that are roadless for all intents and purposes but still containing very small remnant segments of ML 1 or ML 2 roads, thereby representing areas where road reduction should be prioritized to enhance further protections and improve the ecological and recreational value of the area. Roads 3220051 and 3220022 overlap uninventoried roadless areas greater than 5,000 acres in size. In identifying roads for decommissioning, we focused on uninventoried roadless areas greater than 5,000 acres because they can be evaluated as potential Wilderness areas by the Forest Service and eventually designated as Wilderness by Congress. In the current EA, road 3220051 is planned for transition to ML 1. We recommend going the extra mile and removing this road from the system to advance several tenets of ecosystem management while also increasing opportunities for strengthening protections for this area into the future. Road 3220022 is not currently part of the plan but also should be included for closure.

We have also investigated the role of climate corridors, separate from our examination of roadless areas, to identify areas where increased connectivity value and lower road densities would be most beneficial for species and population longevity in the face of climate change. We have found that a large subset of roads in the area overlap with important old-growth

connectivity corridors (see Figure 1), which were identified by running a density analysis of forest stands >150 years old and then running an analysis tool that identifies suitable corridors between these areas. Table 2 highlights the ML 1 and ML 2 roads overlapping these corridors. We suggest that the roads listed in Table 2 be further considered for removal from the system to support habitat connectivity for climate resilience.

Table 2.

ML 1 and ML 2 roads overlapping old-growth habitat corridors in the Upper Lewis River Roads Project area					
3211747	3100169	3011031	3211100	3220709	9039370
5110603	3101000	3011040	3211110	3220713	9039377
9000330	5100117	3101111	3211200	3220715	9039380
5100000	5100165	3103000	3211210	3220716	9039381
3000401	5110118	3103601	3211713	3220717	9039384
3000420	5110162	3200000	3211732	3230000	9037000
3000431	3000711	3200101	3211734	3230724	
3000441	3000712	3200121	3211739	3230725	
3000446	3000713	3200141	3211743	3230729	
3000451	3000714	3200150	3211745	6500726	
3000481	3000716	3200160	3220000	9000310	
3000491	3000717	3200161	3220022	9000340	
3000500	3000722	3200166	3220030	9000360	
3000580	3000723	3200174	3220051	9000370	
3000585	3000725	3200714	3220054	9000390	
2400221	3000726	3200716	3220061	9000410	
2400230	3000729	3200718	3220070	9000470	
2400790	3000730	3200720	3220081	9039000	
2400791	3000738	3200723	3220090	9039230	
2480000	3000740	3200724	3220100	9039250	
2480020	3000744	3200726	3220121	9039310	
3054100	3011000	3200732	3220140	9039315	
3100000	3011020	3211000	3220708	9039330	

III. RoadRight GIS analysis

We previously carried out a forest-wide GIS roads analysis using the RoadRight model to add valuable ecological and recreation data to roads planning in the GPNF. These results were summarized into a report and sent to the Forest Service in 2015 for incorporation into the planning process. Below, we have created a map from this analysis showing "combined risk" values of the roads in the project area (Figure 2). This ranking was created by considering aspects that influence the negative impacts of roads, such as stream crossings, soil stability, topography, sedimentation, habitat designations, and isolation values. Using this information, we can see priority roads for closing or decommissioning which are labeled in red and orange on the map. Table 3 shows the highest ranked roads of this combined risk analysis (roads rated 100 out of 100); it highlights the roads labeled in red in Figure 2. More of these roads should be included

in this project and considered for closing or decommissioning to support the values considered in the comprehensive RoadRight analysis.

Table 3.

Roads rated high in combined risk			
9310050	3220051	9000340	3000420
9039380	3211735	9000360	3000401
9308000	3220713	5110162	3000104
9310000	3200174	5100165	6507000
9039000	3200167	5100125	3050000
9039370	3011040	3211734	6507130
9039310	3011020	3211000	3050605
9310240	3011031	3211743	5110000
5100117	3000431	3220022	

IV. Restoration plan details

During field surveys, Cascade Forest Conservancy staff and volunteers were able to locate specific restoration priorities and focus areas. Most of these have been discussed in our recent yearly reports and past comments, but information from these documents that applies to particular areas of this EA is outlined below.

Road 3000431: This road is on the list to remain a ML 2 road, but due to its placement near important terrestrial and aquatic habitat areas and its combined risk ratings of 75 and 100 identified along the majority of its length, it should be fully decommissioned or moved to ML 1.

Road 3200121: This road has many plugged culverts, related occurrences of erosion, and trash littered throughout. We are glad to see this road being rehabilitated, properly blocked, and cleaned up. But, unfortunately, this road is listed in the plan as moving from ML 1 to ML 2. Progress in the other direction is what is most needed. Further, a large section of this road has a combined risk rating of 75 (on a scale of 0 to 100), so should be a strong candidate for moving from ML 1 to a decommissioned state, rather than the opposite direction.

Road 3200101: This is another road moving from ML 1 to ML 2, counter to need. This road is also rated high in combined risk (75) and is therefore a strong candidate for moving from ML 1 to a fully decommissioned state.

Road 3200: This 3.5-mile road has high combined risk ratings (areas of 75 and 100). Parts of this route should be included with the roads changing from ML 2 to ML 1 or ML 1 to decommission.

Road 3011000: We are glad to see that our work surveying and cataloging blocked culverts was helpful in prioritizing this road for restoration.

Road 3054100: This road has plugged culverts along a portion of its full length and needs repair. Further, it contains areas with combined risks of 75 and 100, signifying a high value in closing and, at the least, repair.

Road 3000481: There are partially deconstructed sections of culvert pipe toward the end of this road. Although this road was noted for a shift from ML 2 to ML 1 in the scoping document, it is no longer mentioned as part of the plan. This road should be rehabilitated and moved from ML 2 to ML 1 or a decommissioned state.

Road 6507131: The end section of this road is planned for decommissioning, which is a positive development due to noted evidence of road failure and wildlife use. However, we feel that a greater portion of this road needs reclassification to more significantly and positively impact surrounding terrestrial and aquatic habitats.

V. Unclassified routes

We are pleased to see that the EA acknowledges the existence and impact of unclassified routes on the landscape and specifies efforts to effectively close these routes and fix the causes of current erosion. During the field surveys of 2014 and 2015, Cascade Forest Conservancy staff and volunteers identified and mapped the location of a portion of the unclassified routes on the landscape, and we are glad to see the results of these efforts used to improve this project. However, more restoration effort should be outlined to assist with revegetation. These areas are often heavily degraded due to misuse and trespass with off-road vehicles. Steps to sufficiently block and revegetate unclassified routes will reduce sediment delivery to streams and rivers, increase the amount of suitable habitat for terrestrial species, and decrease the amount of litter. Subpart A defines a road as "[a] motor vehicle travelway over 50 inches wide, unless designated and managed as a trail," which "may be classified, unclassified, or temporary." 36 C.F.R. § 212.1. According to these regulations, the Forest Service must consider unclassified roads located within the National Forest as part of the process of identifying roads that are no longer needed. The Guidelines for Road Maintenance (2005) states that the agency must "sufficiently block or berm these areas to discourage continued use and circumventing of blockades, per established maintenance guidelines." Further, in accordance with the Middle Lewis River Watershed Analysis, efforts should be outlined for planting trees and native seeds along closed routes to more effectively promote regrowth and increase the efficacy of the restoration effort. Middle Lewis River Watershed Analysis, p. 135. Citizen volunteers and partner organizations can add value and assistance with this, but the bulk of the restoration effort should be carried out simultaneously with the other maintenance efforts of the Upper Lewis River Pilot Project.

VI. Travel Analysis Plan for the Gifford Pinchot National Forest

The recently published draft of the Travel Analysis Plan for the Gifford Pinchot National Forest attempted to outline a sustainable plan for managing the oversized road system of the forest, but fell short in matching budgets and impacts with feasibility and access needs. We are hoping to see these shortcomings addressed at the project scale. To capture a more accurate account of timber access needs, a local plan should identify *truly necessary* access routes for timber units, consider secondary access routes, and factor in whether units will only require one entry. This will more effectively highlight the actual need to maintain a particular road segment so that they can be more accurately balanced with their ecological impact. If multiple access roads are not

needed for future management activities, the secondary routes should be considered for decommissioning. During a local-scale investigative process, such as that of the Upper Lewis River Pilot Project or road restoration efforts that are part of timber harvest proposals, the agency should recognize and highlight new opportunities to decommission a more substantial set of roads.

VII. Conclusion

We appreciate the Forest Service's consideration of our comments on the EA for the Upper Lewis River Roads Pilot Project. We hope our input is helpful in developing a road management plan for the area.

Sincerely,

Shiloh Halsey, Conservation Science Director
Cascade Forest Conservancy

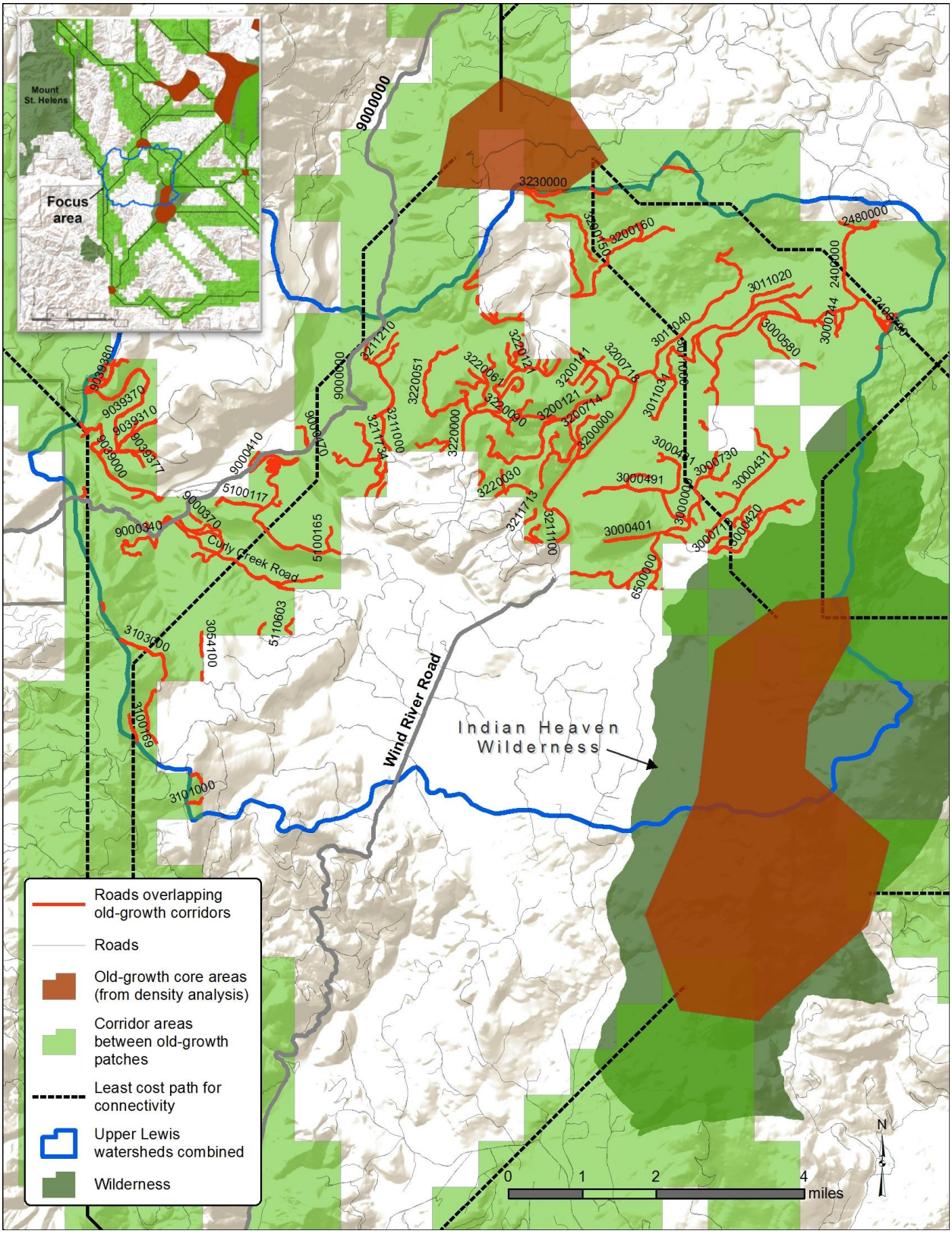
Mount St. Helens
Focus area
Wind River Road
Curly Creek Road
Indian Heaven Wilderness
Roads overlapping old-growth corridors
Roads
Old-growth core areas (from density analysis)
Corridor areas between old-growth patches
Least cost path for connectivity
Upper Lewis watersheds combined
Wilderness
0 1 2 4 miles
N

Figure 1.

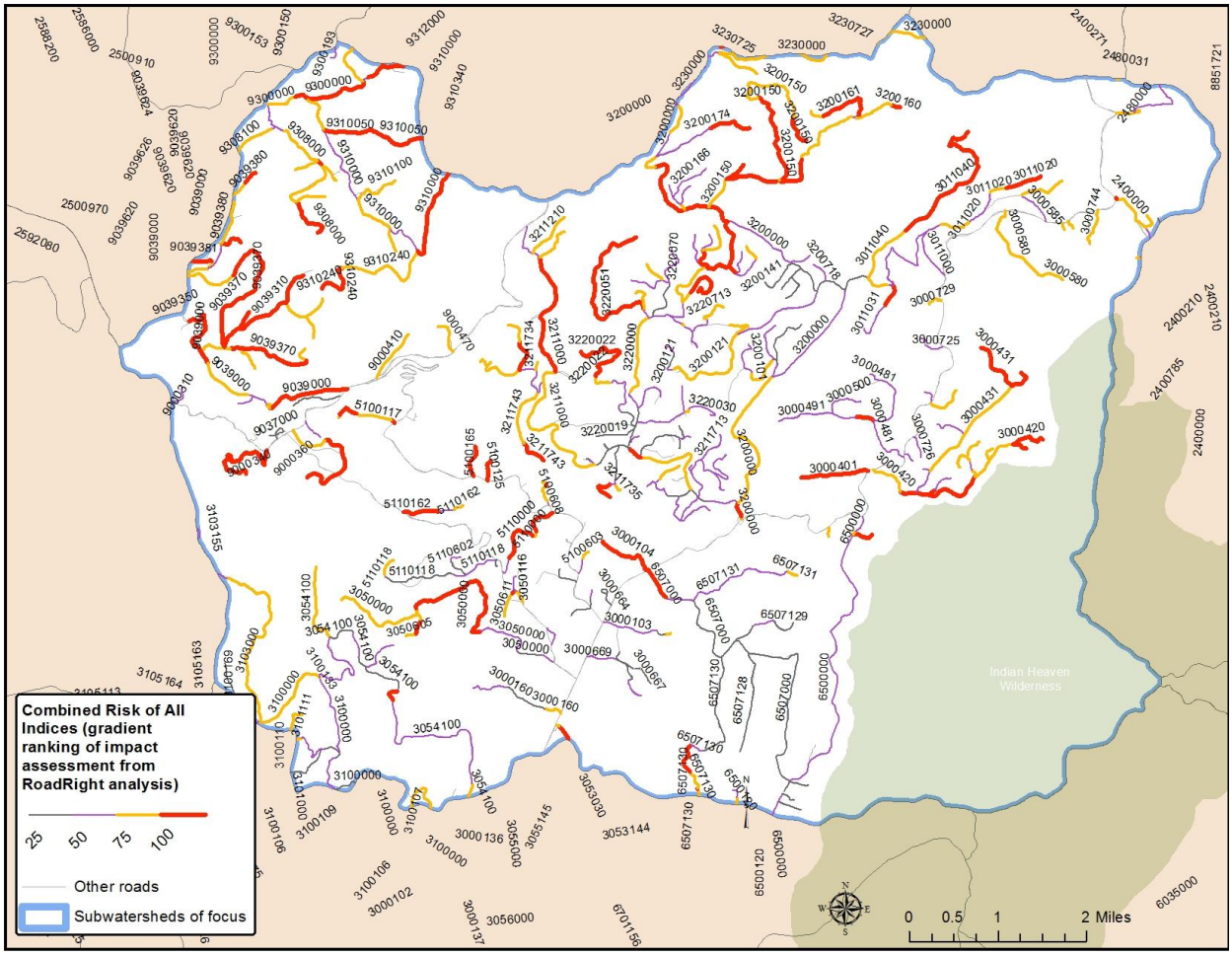
Combined Risk of All Indices (gradient ranking of impact assessment from RoadRight analysis)
25
50
75
100
Other roads
Subwatersheds of focus
Indian Heaven Wilderness
0
0.5
1
2 Miles

Figure 2.