



Comments on the Proposed Rescission of the 2001 Roadless Area Conservation Rule

Submitted by: Backcountry Hunters & Anglers, Texas Chapter

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Proposed Rule: Special Areas; Roadless Area Conservation

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I. Introduction

Backcountry Hunters & Anglers (BHA) is a national organization representing hunters, anglers, and other public-land users who depend on healthy fish and wildlife populations, functioning ecosystems, and meaningful access to public lands. The Texas Chapter appreciates the opportunity to provide technical comments regarding USDA's proposal to rescind the 2001 Roadless Area Conservation Rule.

BHA supports active, science-based forest management, including management that addresses wildfire risk, forest health, wildlife habitat, and responsible public access. These needs should be evaluated at the forest and project level rather than assuming that rescission of the Roadless Rule is necessary to achieve them. Where access or management needs exist, the Forest Service should consider existing roads, road reconstruction, temporary or seasonal access, existing exceptions, and project-level environmental review before determining that permanent new road construction is warranted. BHA supports Alternative One, the No Action Alternative.

All inventoried roadless areas in Texas are within the Sam Houston National Forest, less than an hour north of Houston. The SHNF provides public hunting opportunities for white-tailed deer, waterfowl, dove, small game, predators, and feral hogs, and makes up 16 percent of all public hunting land in the state. Rescinding the Roadless Rule would put the SHNF at a higher risk to soil loss through erosion, habitat loss due to heightened wildfire risk, and contaminated aquatic habitat due to increased runoff.

There are four inventoried roadless area fragments within the SMNF, listed below. Erosion potential is calculated based on the internationally recognized Revised Universal Soil Loss Equation (RUSLE). All four fragmented areas, including one that carries the highest level of legal protection afforded to federal public lands under the Wilderness Act of 1964, are highly sensitive to road building and other disturbances and show a high potential for increased soil erosion.



Big Creek is a 1,447-acre Inventoried Roadless Area in the Little Creek-Big Creek watershed (HUC-12 120302021201), Sam Houston Ranger District. This area is centered near 30.510°N, 95.093°W, with boundaries spanning roughly 30.493°N to 30.525°N latitude and 95.108°W to 95.079°W longitude. It drains into the Big Creek. 100% of this IRA (1,447 acres) has high erosion potential -- above 10 tons/acre/year based on the RUSLE model -- indicating high sensitivity to road building and other disturbance that could send sediment into downstream aquatic habitats

Big Woods is a 1,320-acre Inventoried Roadless Area in the Hopkins Branch-Winters Bayou watershed (HUC-12 120401030303), Sam Houston Ranger District. This area is centered near 30.616°N, 95.307°W, with boundaries spanning roughly 30.606°N to 30.633°N latitude and 95.325°W to 95.285°W longitude. It drains into the East Fork Caney Creek. 94% of this IRA (1,242 acres) has high erosion potential -- above 10 tons/acre/year based on the RUSLE model -- indicating high sensitivity to road building and other disturbance that could send sediment into downstream aquatic habitats.

Little Lake Creek is a 596-acre Inventoried Roadless Area in the Little Lake Creek-Lake Conroe watershed (HUC-12 120401010205), Sam Houston Ranger District. This area is centered near 30.492°N, 95.746°W, with boundaries spanning roughly 30.462°N to 30.511°N latitude and 95.758°W to 95.719°W longitude. It drains into the Sand Branch. This IRA also contains the Little Lake Creek Wilderness, which carries the highest level of legal protection afforded to federal public lands under the Wilderness Act of 1964. 96% of this IRA (576 acres) has high erosion potential -- above 10 tons/acre/year based on the RUSLE model -- indicating high sensitivity to road building and other disturbance that could send sediment into downstream aquatic habitats.

Winters Bayou is a 730-acre Inventoried Roadless Area in the Texas National Forest, in the Nebletts Creek-Winters Bayou watershed (HUC-12 120401030304), Sam Houston Ranger District. This area is centered near 30.393°N, 95.144°W, with boundaries spanning roughly 30.385°N to 30.401°N latitude and 95.162°W to 95.126°W longitude. It drains into the Winters Bayou. This IRA overlaps Winters Bayou Preserve, which could further affect the feasibility of road construction. 77% of this IRA (566 acres) has high erosion potential -- above 10 tons/acre/year based on the RUSLE model -- indicating high sensitivity to road building and other disturbance that could send sediment into downstream aquatic habitats.

In addition to the documented erosion risk, recent research published in the scientific journal of the Association for Fire Ecology found that wildfire ignitions were roughly four times more likely to occur near roads than in roadless forests, underscoring that more roads are not necessarily the answer to wildfire risk.



Backcountry Hunters & Anglers supports active, science-based forest management to address wildfire, forest health and responsible access. But wholesale elimination of the Roadless Rule is not the answer. Full rescission of the Roadless Rule would remove longstanding protections from more than 44 million acres of national forest backcountry across 37 states. BHA opposes this action.

Methods

Information on Inventoried Roadless Areas was obtained from the USDA Forest Service FSGeodata Clearinghouse:

<https://data.fs.usda.gov/geodata/edw/datasets.php?xmlKeyword=roadless>

Additional types of land status within IRAs were ascertained from the USGS GAP Analysis Project Protected Areas Database:

www.usgs.gov/programs/gap-analysis-project/science/protected-areas

Erosion potential was calculated using the standard RUSLE model including snowmelt. RUSLE relative soil-loss $R \cdot K \cdot S$, with slope-length (L), cover (C), and practice (P) factors held at 1. The erosion potential value represents inherent susceptibility in relative tons/acre/yr, NOT an absolute erosion rate. The three inputs included:

R: GloREDa annual, converted SI -> US customary.

<https://esdac.jrc.ec.europa.eu/content/gloreda>

K: gNATSGO surface Kw, US customary. <https://www.nrcs.usda.gov/resources/data-and-reports/gridded-national-soil-survey-geographic-database-gnatsgo>

S: McCool et al. (1987), broken at 9% slope (5.143 deg).

McCool, D.K., Brown, L.C. and Foster, G.R. (1987) Revised Slope Steepness Factor for the Universal Soil Loss Equation. Transactions of the American Society of Agricultural Engineers, 30, 1387-1396.

<http://dx.doi.org/10.13031/2013.30576>

Extended RUSLE with seasonal snow memory was derived from Mouris et al. (2022, J Soils Sediments, 22:1609-1628). The R factor is the sum of the rain term (GloREDa) and a snowmelt term: $R_{total} = R_{rain} + R_{snowmelt}$, $R_{snowmelt} = 2 [MJ/ha/h] \cdot \text{annual melt SWE (mm)}$.

Suitability for road construction was derived from the maximum slope within 120m pixels derived from the 30m resolution LandFire digital elevation model:

<https://landfire.gov/topographic/elevation>. Thresholds (30% / 60% / 67% slope, converted to the degrees LANDFIRE ships) are drawn from published forest-road engineering practice, not invented for this project:



30% (16.7 deg) -- the standard forest-road-planning break between conventional construction and full-bench (Steinbrenner-style slope classes, widely used in FS/BLM road planning: 0-30% / 30-50% / >50%; full-bench fill is specifically the method for 40-60% terrain, below which cut material can be placed directly on the slope).

60% (31.0 deg) -- pre-FRPA (British Columbia) forest-practice regulation: slopes >60% triggered mandatory terrain-stability review for road construction, independent of any other instability indicator.

\# 67% (33.8 deg) -- Alaska Administrative Code 11 AAC 95.290: operators "shall avoid locating a road on a slope greater than 67 percent or on an unstable slope" where feasible.

To be conservative a threshold of 60% grade was used to quantify the number of acres within each IRA where road building is generally not feasible

Thank you for the opportunity to comment.

On behalf of the Texas Chapter of Backcountry Hunters & Anglers,

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