



Consideration of Temporary Roads in the Development of the Roadless Area Conservation Rule

The Forest Service, in its development of the Roadless Area Conservation Rule, conducted extensive analysis and review of the impacts of temporary roads, and found the difference between temporary road construction and permanent road construction to be minor. It was determined by the agency that the use of temporary roads in roadless areas was inconsistent with the protection of roadless area characteristics and values.

According to the FEIS,

Although only used for relatively short periods, **temporary roads present most of the same risks posed by permanent roads**, although some may be of shorter duration. Many of these roads are designed to lower standards than permanent roads, are typically not maintained to the same standards, and are associated with additional ground disturbance during their removal. Also, use of temporary roads in an area to support timber harvest or other activities often involves construction of multiple roads over time, providing a more continuous disturbance to the area than a single, well-designed, maintained, and use-regulated road. **While temporary roads may be used for periods ranging up to ten years, and are then decommissioned, their short- and long-term effects can be extensive to terrestrial species and habitats.**¹ (emphasis added)

In fact, allowing temporary roads was considered as an alternative by the US Forest Service during the development of the Roadless Area Conservation Rule. It was dismissed because it “could have the same effects as the No Action Alternative.” As, “The use of temporary roads may have the same long lasting and significant ecological effects as permanent roads”.

No Net Loss and Rotation of Roadless Areas

These alternatives would provide that the current amount of roadless acres be maintained. Existing roadless areas could be roaded provided new roadless areas are created through decommissioning or obliteration of temporary and classified roads. One approach would involve rotating the roaded and unroaded areas on different parts of each national forest in a one-for-one exchange to maintain the same amount of roadless areas. As an example, after timber harvest activities are completed and the area planted with trees, the roads in the area would be closed or decommissioned returning it to a roadless status. Roads would then be allowed for access to timber in other areas. In this manner, roadless areas would be restored, timber harvest from current roadless areas would continue at the current level, and overall road miles on NFS lands would neither increase or decrease. These various alternatives were eliminated from detailed study, as they **could have the same effects as the No Action Alternative**. These options do not meet the purpose and need of the proposed action. **The use of temporary roads may have the same long lasting and significant ecological effects as permanent roads**, such as the introduction of nonnative vegetation and degradation of stream channels. Vegetation recovery after timber harvest can take decades to restore structure and composition. These alternatives would postpone roaded entry to harvest unroaded areas until the vegetation in the in neighboring harvested areas was sufficiently recovered to mitigate anticipated effects caused by the new entry. Additionally, no-net-loss programs can lead to complicated systems of monitoring, excessive procedural requirements, and complex definitions and criteria.² (emphasis added)

¹ Forest Service Roadless Area Conservation Final Environmental Impact Statement 3-150, 3-164, & 3-176

² Ibid, 2-18