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Brooke Rollins, Secretary
United States Department of Agriculture
Washington, DC

Secretary Rollins:

Friends of the Clearwater and Wilderness Watch provide these comments on the U.S. Department of Agriculture Forest Service's Proposed Rule (Federal Register Vol. 91, No. 160 53827-53832) to rescind the 2001 Roadless Area Conservation Rule, its associated 2001 Roadless Area Conservation Rule Rescission Draft Environmental Impact Statement (DEIS), and the associated cost benefit analysis (hereinafter "Rescission").

Friends of the Clearwater is a science-based wildlands defense nonprofit organization whose purpose is to protect and preserve the wild nature of the Wild Clearwater Country and adjacent watersheds comprising the Big Wild of north-central Idaho and western Montana, including Wilderness, roadless areas, and habitat connectivity for large predators and other at-risk species. Friends of the Clearwater and its board, staff, members, and supporters regularly visit and enjoy the public lands and waters of the Big Wild, including roadless areas, for recreation, conservation, scientific, aesthetic, and other non-consumptive reasons. We fully incorporate Friends of the Clearwater's September 19, 2025 comments on the Notice of Intent (Federal Register 8/29/2025) to prepare an environmental impact statement for the purpose of rescinding the 2001 Roadless Area Conservation Rule.

Wilderness Watch is a national nonprofit organization that has worked to defend the integrity of the National Wilderness Preservation System through policy advocacy, agency oversight, public education, and litigation since 1989. Wilderness Watch has members and supporters throughout the United States. We incorporate by reference Wilderness Watch's September of 2025 comments on the original proposal (Notice of Intent, Federal Register 8/29/2025).

The Rescission would remove restrictions on active management over approximately 44.7 million acres of lands classified as inventoried roadless areas (IRAs) on National Forest System lands, paving the way for increasing human activities that could forever degrade their wild character and other natural qualities the American public values, including biological diversity,

habitats for rare and endangered wildlife and fish species, and the observation of nature unfolding under its own terms.

Purpose and Need

To begin, it is important to identify the real reason for this extremely unpopular Rescission proposal:

> Under the current Administration, the Department has refocused policies, programs, and resources on increasing rural economic opportunity, decreasing Federal regulation, and streamlining Federal Government services. Specifically, this deregulatory action advances the policy objectives of Executive Order 14192, *Unleashing Prosperity Through Deregulation*, to alleviate unnecessary regulatory burdens. In Executive Order 14225, *Immediate Expansion of American Timber Production*, the President declared that "the United State has an abundance of timber resources that are more than adequate to meet our domestic **timber production** needs, but heavy-handed Federal policies have prevented **full utilization** of these resources. In Executive Order 415, *Unleashing American Energy*, the President likewise declared that "it is in the national interest to **unleash** America's affordable and reliable **energy and natural resources**. In Executive Order 14153, *Unleashing Alaska's Extraordinary Resource Potential*, the President declared that "it is the policy of the United States to fully avail itself of Alaska's vast lands and resources" and "**maximize the development and production of the natural resources** located on both Federal and State lands within Alaska."

(DEIS at 10-11; emphases added.) In other words, this is Trump's way of paying back the ultrarich capitalist oligarchs who funded his reelection, attempting to deliver them the publicly owned natural resources found on national forests for extractive and profit-driven purposes. We are not distracted by the various other justifications the Rescission offers, however we do point out contradictions, inconsistencies, lack of logic and failures of reasoning that the Forest Service uses in an attempt to veil this attempted theft of public resources. It is a stain on the Forest Service for promulgating a fiction-based purpose and need and wasting the public's time and energy when it should instead be focused on the genuine critical issues facing our national forests—biodiversity loss and the climate crisis.

Inadequate Range of Alternatives

Our organizations' September 2025 comment letters requested an alternative with more protection than the no-action alternative. There was no such alternative in the DEIS. In the November 2000 EIS for the 2001 Roadless Rule, the Forest Service did consider and evaluate an alternative that had no exceptions for logging and roadbuilding. Now, with its arbitrarily and capriciously narrow purpose and need and narrow range of alternatives, the Forest Service violates the National Environmental Policy Act.

Roadless areas sustain healthy watersheds that slow and store water, filter sediment, protect water quality and provide habitat for fish and wildlife. National Forest lands supply drinking

water to more than 60 million people. Roadless forests will also serve as climate refugia into the future. Protecting these high-value habitats is critical.

Roadless areas are vitally important for recovering populations of endangered species, which can only thrive if habitat connectivity is maintained across their ranges. Current roadless area protections provide essential habitat connectivity, but not enough to assure robust and viable numbers. To preserve biological diversity and manage lands in compliance with laws such as the National Forest Management Act and Endangered Species Act, stronger safeguards are needed.

Human-caused climate change is causing severe and widespread harm to the health and livelihoods of people around the world, as well as to ecosystem integrity and biological diversity. Unmanaged forests play a critical role in combating climate change by capturing carbon dioxide and storing it within soils and forest biomass. Yet the DEIS promotes soil carbon loss due to road construction, skid trails, landings and other logging impacts. Scientific studies show that soil compaction and removal or vast disruption of the forest floor lead to large, persistent losses of soil carbon. Only when forests are sustained by natural processes will they efficiently continue to sequester carbon, providing the greatest opportunity for near-term climate benefits. The DEIS's purpose and need is cynically and irresponsibly written to result in action alternatives that can only accelerate climate chaos. What is really needed are Rule alternatives that move more areas of national forest land—nationwide and including Colorado, Idaho, and Alaska—into a status that minimizes greenhouse gas emitting management activities.

The administration's push to rescind the Roadless Rule relies heavily on fire arguments. But science is unequivocal: roads are the primary facilitator for sources of ignition by human-caused fire, with nearly 95 percent starting within a half-mile of a road. Allowing more roads would increase fire starts and therefore elevate risk to communities. Climate and weather, not fire-adapted ecosystems, are the primary drivers of fire behavior. Fire becomes catastrophic only when lives or homes are at risk. Home hardening and maintaining defensible space within 100 feet of structures remain by far the best ways to protect lives and property. The agency propaganda promoting fear of fire to justify logging, another management activity that makes forests more vulnerable to fire, is unethical and reprehensible. Again, what is needed is an alternative resulting in more areas of national forest land in a roadless, unmanaged condition.

The Forest Service must include more protective alternatives that also prohibit livestock grazing in roadless areas, given the degradation of ecological integrity, increased wildfire activity, and emission of greenhouse gases resulting from grazing of domestic, nonnative livestock.

Action alternatives would degrade Wilderness

Congress established the Wilderness Act "to secure for the American people of present and future generations the benefits of an enduring resource of wilderness" and established the National Wilderness Preservation System and the administration of this system, "for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character." 16 U.S.C. §1131(a).

Wilderness is “in contrast with those areas where man and his own works dominate the landscape,” and is “an area where the earth and its community of life are untrammeled by man.” Wilderness areas are “undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.” 16 U.S.C. §1131(c). These are often the standards that guide recommendations to designate areas as Wilderness.

The Forest Service has an obligation to preserve wilderness character of designated Wilderness. 16 U.S.C. §1133(b).

Because of the Roadless Area review and evaluation process that grew, in part, out of the Wilderness Act’s mandates to the agencies to recommend Wilderness, the substantive qualities underlying roadless characteristics are similar to wilderness character: roadless areas are relatively undisturbed and undeveloped ecosystems where natural processes are often left alone to govern. Roadless areas are often the pool from which the Forest Service considers and evaluates recommendations for Wilderness. Both action alternatives would drastically impact Roadless areas’ potential to become Wilderness.

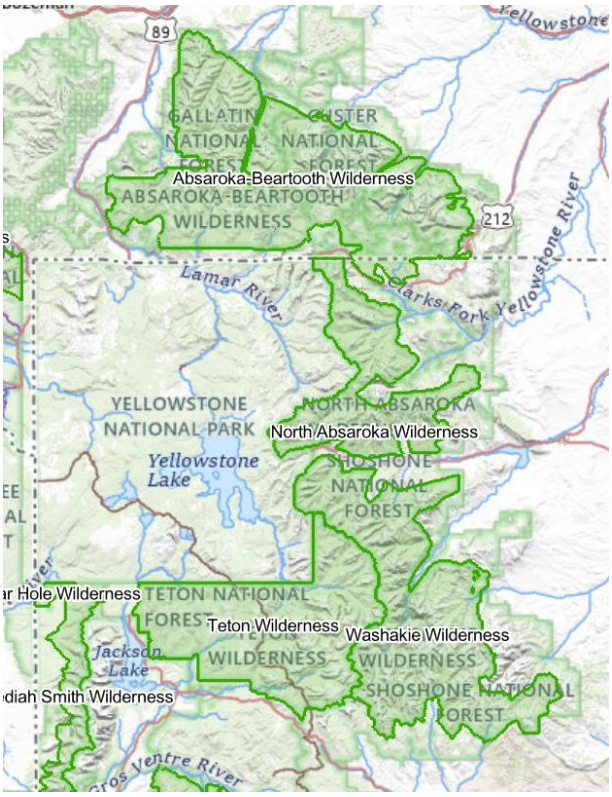
Repealing the roadless rule would delay and may prevent adding eligible areas to the Wilderness System in our lifetime. Once roads are built and roadless areas logged, recovery could take many, many years before it “appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable.” For the Eastern U.S., the Forest Service recognized the time for an area with past logging to become “substantially unnoticeable” was 100 years. Trees generally don’t grow as fast in the arid West, so that time could be even longer.

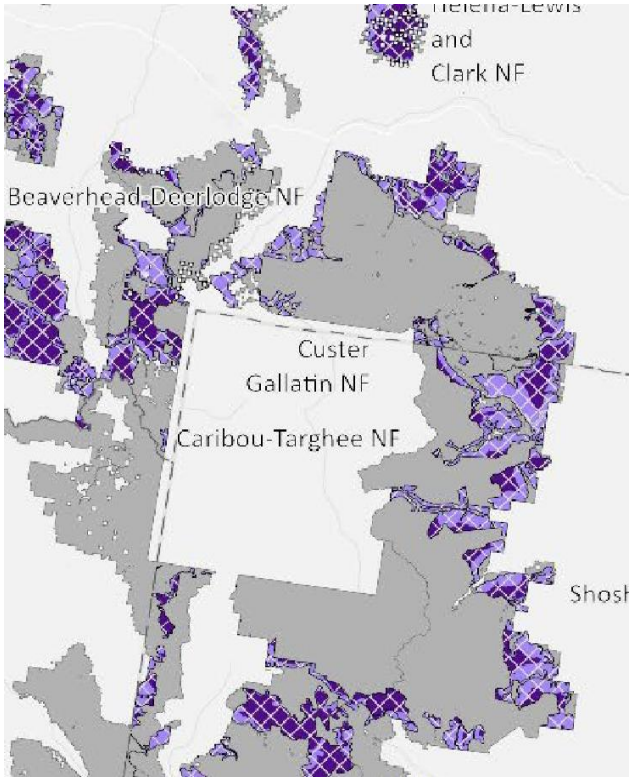
The EIS presumed that congressionally designated “wilderness study areas” (WSAs) would protect some of the roadless areas where the action alternatives remove roadless protections. But the protection of these WSAs is no guarantee. In the 119th Congress, for example, the bill H.R. 6788 and its counterpart, S. 3527, releases over 92,000 acres of Wilderness Study Areas in the National Forest System of Montana. These WSAs are also roadless areas. Montana’s Senator Daines has been on record justifying this bill’s repeal of WSA designation in these areas because the 2001 Roadless Rule would protect them. So the Forest Service is working to eliminate the Roadless Rule saying congressional WSA designation will protect some of these areas, while Congress is trying to eliminate WSA designation while explicitly assuming the 2001 Roadless Rule will protect these areas. There is a real chance these areas would end up entirely unprotected without the Roadless Rule, so assuming continuing protection in other forms is not realistic.

The community of life found in Wilderness would be negatively impacted by greater degrees with the action alternatives. Roadless areas provide habitat to threatened, endangered, proposed, candidate, and sensitive species. Most species that are protected by the Endangered Species Act

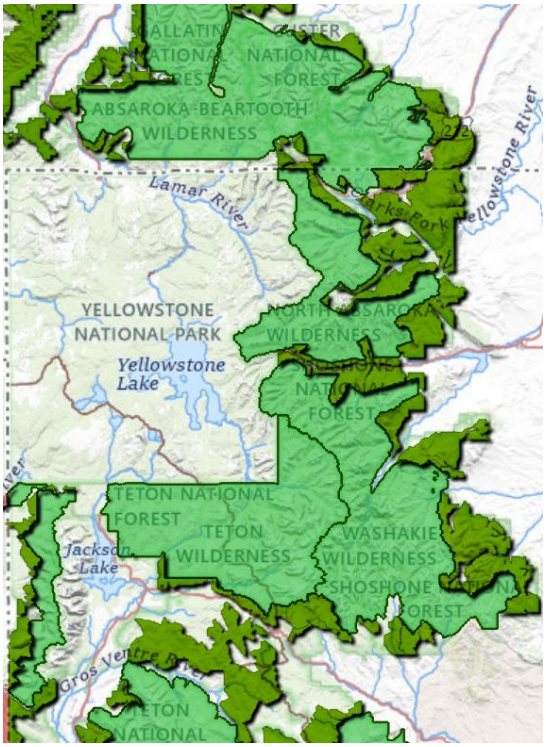
were listed because they have lost habitat due to human disturbance and development. Roadless areas often provide habitat and augment nearby Wilderness to create large, unfragmented wild systems. In some of the large wilder areas of the West, roadless also create or assist biological corridors between each other and other Wilderness areas.

To exemplify, below are maps of northwestern Wyoming. The map on the left is excerpted from the map on the Wilderness Connect website (http://wilderness.net). Lighter green are national forests, and Wilderness areas are brighter green with darker green lines as boundaries. In comparison, maps on the right are from Volume II of the Rescission DEIS. Both shades of purple with the white crosshatching are the roadless areas and prohibitions that the agency is proposing to eliminate in Alternative 2. The light purple is what the agency is proposing to eliminate in Alternative 3.

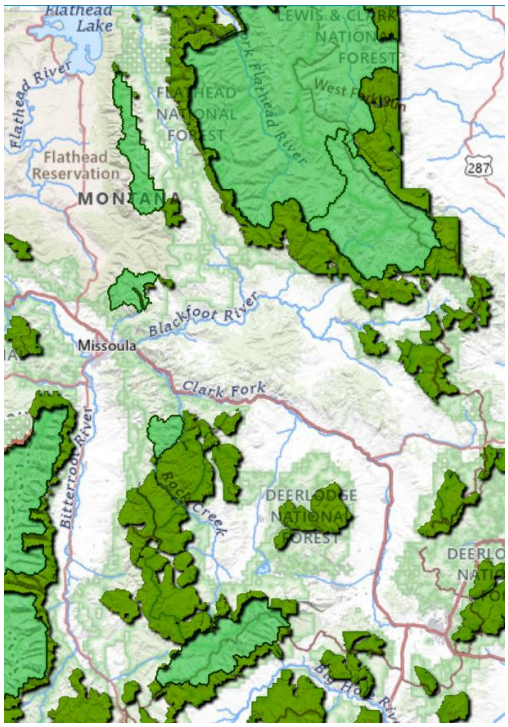


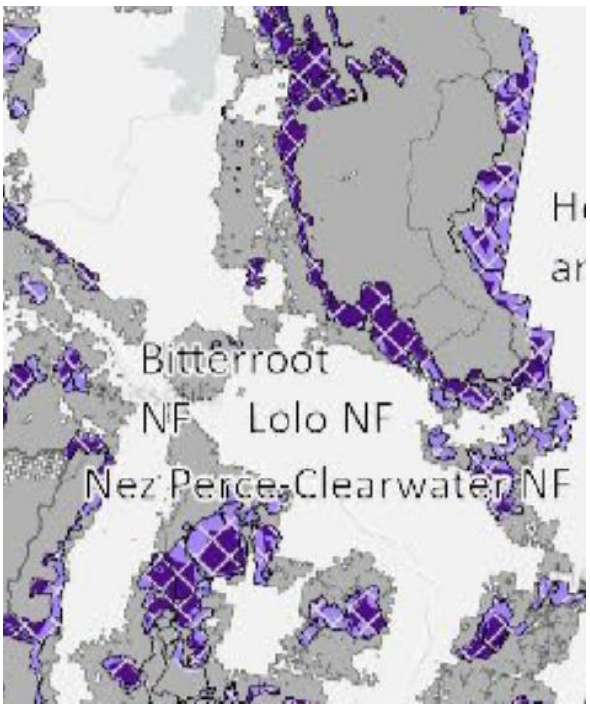


The map below is courtesy of mapping layers from the Outdoor Alliance. It depicts what the Forest Service should have done—overlay Wilderness and IRAs. The mint green is Wilderness, and the forest green is roadless. When IRAs and Wilderness are thus displayed, the manner in which roadless areas enhance habitat connectivity and other large areas of habitat is quite clear. Roadless areas are relatively secure habitat and provide links between Wilderness areas. Wilderness Watch stated this in September 2025 comments, with excerpts from the Tongass.

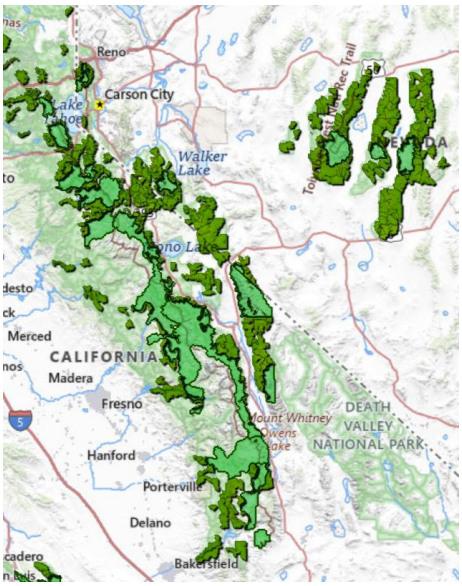


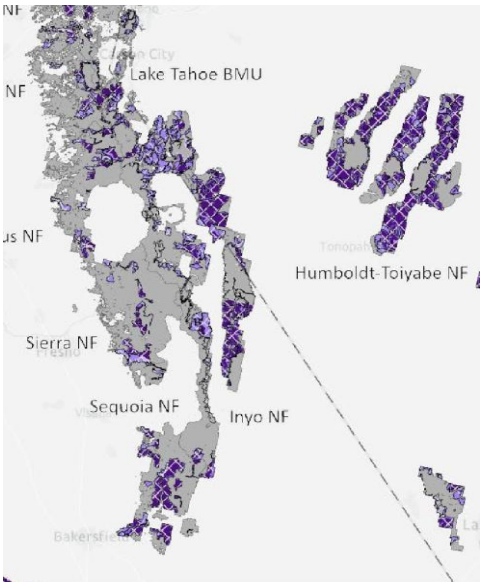
Grizzly bears, Canada lynx and wolverines in the northern Rockies, for another example, are struggling to recover even under the no-action alternative largely because of the impacts inherent to roads. Both action alternatives would delay or prevent the recovery of these species by facilitating clearcutting and other logging plus construction of more roads—further fragmenting habitat.



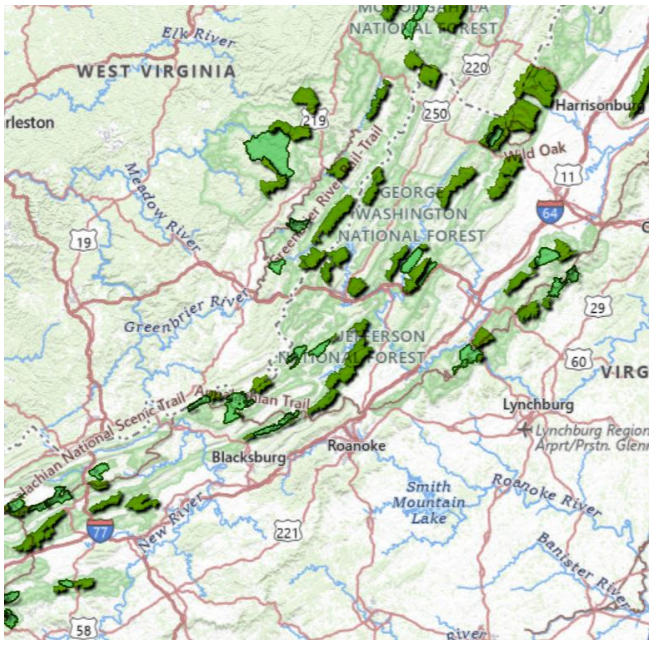


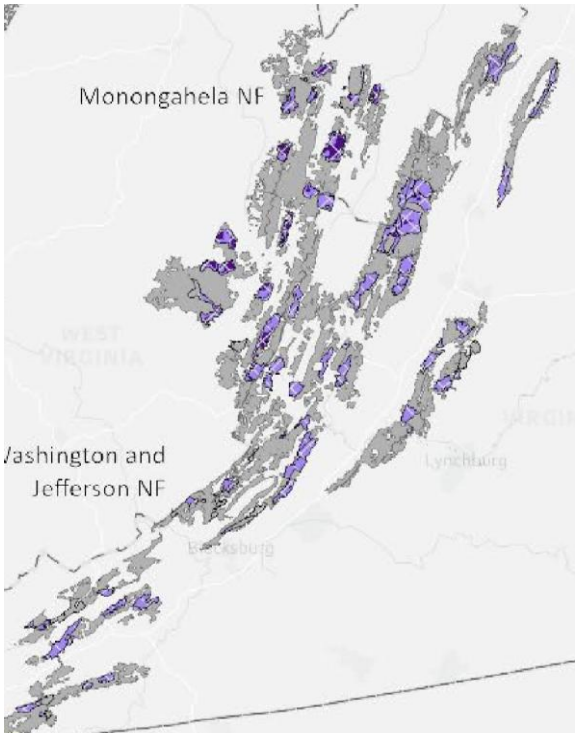
This phenomenon exists nationwide. Below are maps from roadless and Wilderness on either side of the California and Nevada border where roadless augment, connect, or lessen the distances between relatively secure habitat and Wilderness areas.





And below are maps to the same effect on the Virginia/West Virginia border.

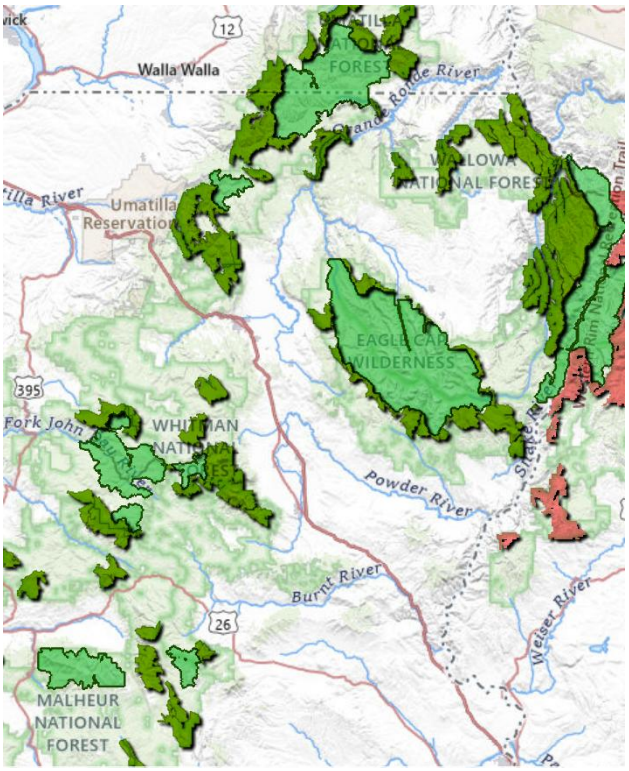




In developing roadless areas (i.e., repealing protections on those areas indicated in purple in above maps), the Forest Service would reduce vital habitat and eliminate roadless areas currently serving as biological corridors, rendering them more perilous for wildlife navigating between secure habitats.

Whereas the Forest Service estimates what might be developed, its guess seems arbitrarily optimistic because the 2001 Roadless Rule drove prohibitions in forest plans, not the other way around. Given the Rescission allowance for logging and roadbuilding in undeveloped lands, there would likely be a rush by the Forest Service to amend forest plans not only programmatically, but also under each new logging project. The DEIS severely underestimates this. And as such logging would likely be widespread, habitat value would be reduced by more than the mere logged acreage or disturbance from a new road.

The map below shows the Blue Mountains Forest Plan revision area, covering the Wallowa-Whitman, Umatilla, and Malheur National Forests in eastern Oregon and southeastern Washington. Mint green indicates Wilderness, forest green is roadless. Currently, these three national forests are undergoing a forest plan revision, and the Forest Service's favored alternative would remove protections for 722,000 acres of inventoried roadless areas.



In roadless areas bordering Wilderness, logging and roadbuilding would adversely impact Wilderness characteristics. Also, edge effects from development would displace wildlife into Wilderness, which could not accommodate all displaced individuals, causing populations to decline. People recreating in Wilderness would have to traverse further into Wilderness for the same solitude and remoteness that roadless areas now add to Wilderness. Logging and roadbuilding near Wilderness, with all the noise and other effects, would impact Wilderness.

Developing roadless areas would also push more recreation pressure into Wilderness, which is already feeling the squeeze of development because Wilderness only constitutes three percent of the lower 48 and five percent if Alaska is included. The Forest Service is receiving many comments from folks who recreate in roadless areas because they exhibit wilderness characteristics not found in clearcut, roaded landscapes. If roadless areas are developed, unconfined and primitive recreation experiences become available only in Wilderness. There is a threshold where recreation pressure adversely impacts wilderness character and wildlife behavior. Both action alternatives would squeeze wildlife into fewer acreage, and then recreation pressure would squeeze wildlife even further, accumulating effects on species already struggling with habitat loss.

Wilderness character would also likely be degraded by the proposed repeal of the Travel Management Rule, the cumulative effects of which are inadequately disclosed in the DEIS. The current Travel Management Rule assumes trails and roads are closed to motorized and mechanized use unless designated open, usually accomplished by planning. The proposed amendment to that rule opens everything to motorized and mechanized use unless specifically closed. Since there is little management motivation for planning, implementing, and administering new road and trail closures, motorized recreation pressure would spread. As DEIS (Vol. I, p. 178) states, on the National Forest System approximately 19 percent of trails are in Wilderness, but 41 percent of trails are outside of Wilderness in a nonmotorized use area, which is often a roadless area. The proposed reversal of the travel management rule effectively converts those 41 percent of nonmotorized trails into motorized. This would very also concentrate more nonmotorized recreationists into Wilderness.

When combined with roadbuilding for logging in roadless, roads would be built closer to Wilderness. The DEIS considers that new roads would be temporary and closed to public motor vehicle use, but this assumption arbitrarily downplays this impact. Repealing the Travel Management Rule would eliminate most restrictions on motorized and mechanized use while facilitating more roads. After "temporary" roads are built, one method the Forest Service uses for "decommissioning" is leaving the compacted soil/roadbed and "abandoning" them by placing a barrier or gate at the beginning of the so-called temporary road. Barriers are regularly bypassed and locks on gates broken. As a result, developing roadless areas would likely result in motorized use much closer to Wilderness.

In sum, both action alternatives would negatively impact the National Wilderness Preservation System. This would also delay and possibly prevent adding eligible areas to the Wilderness System, relying on legislative protections of roadless areas that may not be available in the future. The action alternatives would develop roadless areas on a bigger scale than the DEIS presumes, fragmenting protected land that connects Wilderness habitats for threatened endangered, proposed, candidate, and sensitive species. The loss of roadless protections would reduce habitat that could cause decline in wildlife populations. Developing roadless areas would concentrate primitive recreation opportunities into Wilderness, compounding issues for protected and vulnerable species. With logging and roadbuilding in roadless areas, noise and other environmental effects would impact neighboring Wilderness areas. This includes roads closer to Wilderness, which would bring much more motorized use closer to Wilderness with the combined effect of the repeal of the Travel Management Rule.

The DEIS concedes that the action alternatives fail to meet the alleged purpose and need

Throughout the DEIS, the USDA Forest Service repeatedly invokes a need to reduce wildfire risk and improve forest health as primary reasons for the proposed rescission of the Roadless Rule, and yet its own analysis shows that the increased roads and logging envisioned by the action alternatives is likely to undermine these stated goals. The DEIS admits that "impacts from road construction and timber harvest activities" include "increased fire frequency (human-caused)". The DEIS further admits that "the number, frequency, and density of wildfire ignitions are lower in designated wilderness and potentially affected IRAs compared to other NFS lands", and that building roads into Roadless Areas will likely "increase the number and frequency of

wildfires as human-ignitions are more likely near roads." The DEIS also admits that road building and logging would "increase the extent" of "invasive plant species", which are highly combustible. The DEIS fails to analyze and disclose the increased threat to communities that would result from the intensified and expanded wildfire activity that would result from the action alternatives.

Perhaps to mitigate these consequences that conflict with their stated purpose and need, the Forest Service poses that "public access could be limited to minimize fire hazard" in certain "high-risk areas". Yet the DEIS fails to divulge the specific or estimated extent of this serious and potentially landscape-scale exclusion from public lands–across potentially millions of acres–to hikers, equestrians, hunters, mountain bikers, and even motor vehicles as a way to partially mitigate the increased wildfire activity admitted in the DEIS.

The DEIS also admits that the increased road building and logging facilitated by the action alternatives would cause degradation of ecological integrity in a wide variety of ways including: "sedimentation and impacts to water quality", "landscape fragmentation", and "adverse impacts to threatened, endangered, or sensitive wildlife and plants". The DEIS further elaborates on the degradation of forest health that would be caused by this road building and logging promoted by the action alternatives, including "loss of vegetation", "soil erosion and compaction", "loss of soil productivity", "increased water runoff" (i.e., increased flooding), and "reduced water quality", as well as "reduced air quality". In a shocking admission, the DEIS states that the road building and logging that would occur under the action alternatives would be "likely to adversely affect" a total of "327 ESA-listed species and 71 critical habitats". The Forest Service has not made public a Biological Assessment that is required under law given such admitted impacts. And given the huge scale of adverse impacts, the Biological Opinions of both the National Marine Fisheries Service and U.S. Fish and Wildlife Service must be disclosed to the public as part of the public process before a decision is made.

Roadless Rescission conflict with Best Available Science (BAS)

In our above comments we allude to conclusions from scientific research, a wide body of which indicates the proposed Roadless Rule rescission ignores best available. To further the consideration of BAS, our comments incorporate by reference the October 2026 comments on this DEIS written by Dominick A. DellaSala, Senior Conservation Scientist Associate with the Conservation Biology Institute.

In closing, at the very least the Forest Service must scrap the action alternatives' proposal to rescind the Roadless Rule. As our comments clearly demonstrate, alternatives to increase land protection from management activities to safeguard biological diversity and to better combat climate change must be fully analyzed and disclosed. Please keep our organizations informed with all future communications regarding this proposal.

Sincerely submitted,

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