

To: Joshua White, Acting Director, Ecosystem Management Coordination
Cc: The Honorable Brooke L. Rollins, Secretary of Agriculture
Chief Tom Schultz, U.S. Forest Service
October 4, 2026

We, the undersigned 208 groups and businesses, on behalf of our millions of members, supporters, and customers, strongly oppose the proposed rescission of the 2001 Roadless Area Conservation Rule ("Roadless Rule" or "2001 Rule") and **urge the U.S. Department of Agriculture to adopt Alternative 1, the "No Action" alternative.**

The proposed rule—analyzed as Alternative 2 in the Draft Environmental Impact Statement (DEIS)—would remove the Roadless Rule's protections against destructive commercial logging and road building from nearly 45 million acres of intact public forests. Alternative 3 does not offer a meaningful alternative to a full rescission, as it would remove roadless designations from more than 30 million acres of forest. Rescinding the 2001 Rule would irreparably harm our nation's wildlife, compromise clean drinking water, threaten the outdoor recreation economy, and threaten Tribal resources and cultural heritage.¹

The Roadless Rule protects wildlife.

The intact wild forest lands protected by Inventoried Roadless Areas are enormously beneficial to the environment and extremely popular with the American public. These forests play an outsized role in supporting iconic and irreplaceable wildlife - making up only 2% of land in the lower 48 states, they provide important habitat for 57% of vulnerable terrestrial wildlife.² Intact mature and old-growth forests, many of which are protected by roadless areas, serve as essential refuges for wildlife facing mounting pressures from climate change, wildfire, and human development.

New logging projects, roads, and the human impacts that follow are all known detriments to wildlife. The DEIS itself admits that "potential adverse effects to terrestrial and aquatic species and habitats from fragmentation, loss of connectivity, edge effects, and human disturbance are much less likely under alternative 1 [no action alternative] than under alternatives 2 [full rescission alternative] or 3 [near-full rescission alternative]."³ This is because intact forest areas protected by the Roadless Rule act as vital corridors connecting landscapes, providing the large, undisturbed blocks of secure habitat necessary for wide-ranging species like grizzly bears, wolves, elk, and mule deer. Indeed, the biological assessments accompanying the proposed rule identify 327 threatened and endangered species and 71 critical habitats as being likely to be adversely affected by rescinding the Roadless Rule.⁴

The Roadless Rule safeguards clean water

The loss of roadless protections will degrade ecosystems far beyond the forests where they are located. The Roadless Rule protects over 130,000 kilometers of streams and rivers (2.5% of total U.S. river length) and serves as the primary safeguard for more than 100,000 kilometers of waterways.⁵ Where roads are present, rainwater diverts from its natural path across the landscape. This water rushes over

¹ Mildrexler, D. J., et al. "Roadless rule rescission threatens highest integrity forest ecosystems in the United States." *Biological Conservation*, vol 321, 111950, 2026, <https://doi.org/10.1016/j.biocon.2026.111950>.

² Dietz, M. S., et al. "The importance of U.S. national forest roadless areas for vulnerable wildlife species." *Global Ecology and Conservation*, vol 32, e01943, 2021, doi.org/10.1016/j.gecco.2021.e01943.

³ USDA Forest Service, *2001 Roadless Area Conservation Rule Rescission Draft Environmental Impact Statement*, 136 (August 20, 2026) ("DEIS").

⁴ DEIS at 161.

⁵ Olden, J. D., et al. "Assessing the value of the U.S. Roadless Rule for people and nature." *PLOS Water*, vol. 5, no. 7, 2026, e0000538, doi.org/10.1371/journal.pwat.0000538.

the soil and past the vegetation that would typically filter out pollutants, picking up sediments that degrade water quality along the way. Pollution from road traffic and toxic byproducts accumulate on the road's surface, further degrading the water quality entering rivers and streams and directly threatening sensitive aquatic life, including native salmon and the threatened bull trout.⁶

Intact, roadless forests often protect the headwaters of rivers and streams. They naturally capture, filter, and channel clean water, reducing the massive capital costs of advanced water treatment downstream.⁷ At least 25 million Americans rely directly on roadless area-influenced watersheds for their drinking water.⁸ In New Mexico and Montana, over one-third of the population sources its water from these protected areas. Commercial logging, which is a major motivation for rule rescission,⁹ directly degrades water quality by increasing sedimentation, turbidity, and nutrient runoff, effectively driving up water treatment costs for millions of customers in downstream municipalities.

The Roadless Rule helps prevent human-caused fires

Roadless areas experience some of the lowest rates of fire ignition across the national forest system. While many of the USDA's statements regarding the rule's rescission have asserted a need to cut roads into these intact forests to prevent wildfires,¹⁰ the latest scientific information effectively dispels that myth.¹¹ The DEIS itself further belies those assertions, finding that fire ignitions are four times more common near roads than in roadless areas; it states that "[i]gnition density is approximately four times greater on other NFS lands compared to potentially affected IRAs and wilderness."¹² While the DEIS does not go far enough in its analysis of the ecological impacts of rule rescission, on this the science is clear: humans are the number one cause of wildfires and fires are significantly more likely to start near a road.¹³ More roads will only heighten wildfire risk.

Moreover, despite the lower risk of wildfire starts, fuel treatments are already - under the current Roadless Rule - taking place across roadless areas.¹⁴

The Roadless Rule provides access to nature for Americans

Spending time in nature offers essential opportunities for fitness, wellbeing, and backcountry adventure. By keeping wild landscapes unfragmented, the rule preserves tens of thousands of miles of trails, climbing routes, and whitewater runs for public access and conserves vital habitat supporting 70% of native trout as well as big game for hunters and anglers.¹⁵

⁶ Tian, Z., et al. "A ubiquitous tire rubber-derived chemical induces acute mortality in coho salmon." *Science*, vol 371, issue 6525, 2020, pp. 185-189. DOI: 10.1126/science.abd6951

⁷ Liu, N., et al. "Quantifying the Role of National Forest System and Other Forested Lands in Providing Surface Drinking Water Supply for the Conterminous United States." *Gen. Tech. Rep. WO-100*. Washington, DC: U.S. Department of Agriculture, Forest Service, Washington Office (2022), p. 40, 10.2737/WO-GTR-100

⁸ Olden (2026)

⁹ The White House, "Immediate Expansion of American Timber Production." 1 March 2025. <https://www.whitehouse.gov/presidential-actions/2025/03/immediate-expansion-of-american-timber-production/>. Accessed 8 September 2026.

¹⁰ US Department of Agriculture, "USDA acts to remove roadless rule restrictions that exacerbate rising wildfire risk." Accessed 1 September 2026. <https://www.usda.gov/about-usda/news/press-releases/2026/08/18/usda-acts-remove-roadless-rule-restrictions-exacerbate-rising-wildfire-risk>

¹¹ Aplet, G. H., et al. "Three-decade record of contiguous-U.S. national forest wildfires indicates increased density of ignitions near roads." *Fire Ecology*, vol 22, article 8, 2026, <https://doi.org/10.1186/s42408-026-00450-2>.

¹² DEIS at 89.

¹³ Aplet (2026)

¹⁴ Healey, S. P. "Long-term forest health implications of roadlessness." *Environ. Res. Lett.* vol 15, 104023, 2020. <https://iopscience.iop.org/article/10.1088/1748-9326/aba031>.

¹⁵ Trout Unlimited. "Roadless Areas Defending America's Sporting Lands."

Each year, millions of Americans rely on roadless areas for hiking, biking, hunting, fishing, paddling, and wildlife watching. Roadless areas overlap with world-renowned landscapes and trails, including substantial portions of the Appalachian Trail, the Pacific Crest Trail, and the Continental Divide Trail. Ultimately, the Roadless Rule ensures that public lands remain intact and accessible, allowing future generations to experience quiet connection, outdoor traditions, and undisturbed wild places.

Rescinding the Roadless Rule will harm the outdoor recreation economy

The economic impact of roadless areas must be understood across a variety of services and values. One report estimated that the Roadless Area Conservation Rule brings 24 billion dollars of benefits each year across habitat, scenic, and recreation values.¹⁶ The DEIS¹⁷ further acknowledges the potential for significant socio-economic loss in “non-commodity values” such as high-quality water, scenery, and personal renewal, should the rule be rescinded. Even the Forest Service’s own flawed cost-benefit analysis projects the loss of these values at approximately \$5.3 million to \$11.5 million per year.

Hunting, fishing, and wildlife-watching alone contribute nearly \$400 billion to the U.S. economy,¹⁸ while the broader outdoor recreation economy generates over \$1.3 trillion annually.¹⁹ A potential 5-10 percent increase in Forest Service timber production from IRA logging would yield just \$5.2-11.4 million of revenue to the federal government.²⁰ This potential logging revenue would not add to the economic value of these forests. Rather, it would degrade the scenic beauty and other environmental values that drive the recreation economy.

According to the DEIS, “In the long-term, losses in trail and dispersed recreation visits because of changes in the recreation opportunities or desirability of landscape conditions could yield lower aggregate expenditures from trail and dispersed area visitors in the communities around roadless areas.”²¹ The projected reduction in these recreation expenditures is estimated to total \$9 million annually, in addition to \$6.1 million in lost economic benefits to trail-based and wildlife-seeking recreationists.²² Furthermore, building new logging roads is a poor use of taxpayer funds, especially given that the Forest Service already struggles with an approximately \$9 billion maintenance backlog on its existing 370,000-mile road network.²³

The Roadless Rule preserves tribal resources

In addition to the strong economic case for retaining the roadless rule, it is critical to acknowledge the cultural value of these forests. Many of the lands protected by the Roadless Rule – such as the Tongass National Forest – are the ancestral homelands of Indigenous peoples who have stewarded them since

<https://www.tu.org/roadless-areas-defending-americas-sporting-lands/>. Accessed 1 September 20206.

¹⁶ Delaney, G. “Roadless Area Conservation Rule Brings \$24B in Benefits.” *Earth Economics*, <https://www.eartheconomics.org/news/roadless-rules>. Accessed 1 September 2026.

¹⁷ DEIS at 225.

¹⁸ U.S. Fish and Wildlife Service. *National Survey of Fishing, Hunting, and Wildlife-Associated Recreation*. 2023.

¹⁹ Outdoor Alliance. “Defend America’s Backcountry Forests: Protect the Roadless Rule.” <https://www.outdooralliance.org/roadless>. Accessed 1 September 2026.

²⁰ DEIS at 220.

²¹ DEIS at 223.

²² DEIS at 224; The Forest Service’s cost-benefit analysis of the Proposed Rule estimates \$4.6-10.6 million in “producer surplus” for the timber industry, calculated as the difference between delivered log value and stumpage value. Cost-Benefit Analysis, p. 23.

²³ Defenders of Wildlife and Wild Earth Guardians. “Technical White-Paper Deferred Maintenance of the National Forest RoadSystem.” January 2026. <https://defenders.org/sites/default/files/2026-04/Deferred-maintenance-of-the-National-Forest-Road-System-report.pdf>. Accessed 9 September 2026.

time immemorial.

The Forest Service knows this, stating, "The majority sentiment among Tribal governments consulted is opposition to the proposed rescission of the 2001 Roadless Rule, viewing it as a threat to inherent rights, Tribal sovereignty, cultural survival, and the ecological health of ancestral homelands."²⁴ Opening these lands to extractive industries threatens to irreversibly damage cultural heritage - and the rushed process for rescinding this rule falls short of the federal government's obligation for meaningful government-to-government consultation.

The Roadless Rule was enacted with overwhelming public support

The Roadless Rule has successfully protected the "living heart" of our National Forest System for a quarter-century, stemming from one of the most robust public rulemaking processes in history. As the Forest Service sought to establish the Roadless Rule, the agency received 1.6 million public comments - approximately 95 percent in support - and held over 600 public meetings nationwide. In fact, the response from the public was so positive that the agency even elected to adopt a more robust version of the Roadless Rule than they had initially proposed. The Rule continues to be widely popular among the public, across political parties and in every corner of the country. These lands are the inheritance of future generations.

By contrast, the public process for the current rescission effort has been woefully inadequate. However, despite attempts to stymie public input, the public has made its opposition known, submitting—for instance—approximately 625,000 public comments last year, when the Forest Service announced its intent to rescind the rule, 99% of which were in opposition to rescission.²⁵

In closing we reiterate that there is overwhelming public opposition to repealing the rule. **The USDA should listen to the voices of the American people. We urge you to abandon the proposed rescission, select the "No Action" alternative in the DEIS, and maintain the 2001 Roadless Area Conservation Rule to protect our remaining wildlands for generations to come.**

Sincerely,

350 Eugene
Active San Gabriel Valley
Advocates for Snake Preservation
Alaska Environment
Alaska Wilderness League
Allegheny-Blue Ridge Alliance (ABRA)
American Hiking Society
Archaeology Southwest
Arctic Connections
Arizona Trail Association
Battle Creek Alliance & Defiance Canyon Raptor Rescue
Bikepacking Roots
Bird Alliance of Oregon
Bird Alliance of Southwestern New Mexico

²⁴ 91 FR 53827.

²⁵ DEIS at 9. See also Center for Western Priorities. "Comment analysis finds over 99% opposition to repealing 2001 Roadless Rule." 19 September 2025. <https://westernpriorities.org/2025/09/comment-analysis-finds-over-99-opposition-to-repealing-2001-roadless-rule/>. Accessed 1 September 2026.

Bird's Eye View Coaching and Consulting
Bitterbrush Broadband - Great Old Broads for
Wilderness
Bluedream Wildlife River Tours
Bryan Hansel Photography LLC
California Environmental Voters
Californians for Western Wilderness
CalWild
Cascadia Wildlands
Catoctin Land Trust
Central Oregon LandWatch
Central Sierra Environmental Resource Center
Chattooga Conservancy
Climate Relations LLC
Coalition for Sonoran Desert Protection
Coalition to Protect America's National Parks
Coast Range Association
Coast to Cascades Bird Alliance
Colorado Mountain Club
Colorado Public Lands Advocacy &
Conservation Expertise (CO-PLACE), LLC
Connecticut River Conservancy
Conservation Law Foundation
Conservation Northwest
Continental Divide Trail Coalition
Craft Construction LLC
Defenders of Wildlife
Delaware-Otsego Audubon Society
Eagle Summit Wilderness Alliance
Earth Neighborhood Productions
Earthjustice
East Cascades Bird Alliance
EcoFlight
Ely Outfitting Co.
Emerald Curtain Collective
Environment America
Environment Arizona
Environment California
Environment Colorado
Environment Florida
Environment Georgia
Environment Illinois
Environment Maine
Environment Michigan
Environment Minnesota
Environment Missouri
Environment Montana
Environment Nevada

Environment New Hampshire
Environment New Mexico
Environment North Carolina
Environment Oregon
Environment Texas
Environment Virginia
Environment Washington
Environmental Defense Center
Environmental Law & Policy Center
Forests Forever
Freeman's Explore LLC
Friends of Animals
Friends of Bell Smith Springs
Friends of Blackwater, Inc.
Friends of Clark County
Friends of Douglas-fir National Monument
Friends of Nevada Wilderness
Friends of the Amargosa Basin
Friends of the Boundary Waters Wilderness
Friends of the Inyo
Friends of the West Shore (of Lake Tahoe)
Friends of the Wild Swan
Friends of White's Woods, Inc.
Friends of Whites Woods
FUSEE (Firefighters United for Safety, Ethics,
and Ecology)
Gallatin Wildlife Association
Georgia ForestWatch
Georgia Interfaith Power and Light
Gila Native Plant Society
Glacier-Two Medicine Alliance
Great Old Broads for Wilderness
Greater Yellowstone Coalition
Green Climate
GreenLatinos
Grove Institute
Heart of the Gila
Heartwood
High Country Conservation Advocates
Idaho Rivers United
International Fund for Animal Welfare (IFAW)
Jackson Hole Conservation Alliance
Kalmiopsis Audubon
Kentucky Heartwood
Kettle Range Conservation Group
Kootenai Forest Stakeholders Collaborative
League of Conservation Voters
Lela Rose

Lipton Landscape Design and Ecology
Los Padres ForestWatch
Maryland Ornithological Society
Massachusetts Forest Watch
MCAT Mobilizing Climate Action Together
Michigan League of Conservation Voters
Mid-Willamette Bird Alliance
Montana Conservation Voters
Mountain Mamas
MountainTrue
Nate Ptacek Photography + Film
National Parks Conservation Association (NPCA)
Native Fish Society
Native Organizers Alliance Action Fund
Natural Resources Defense Council (NRDC)
Nature for All Coalition
New Mexico Wild
New Mexico Wildlife Federation
North American Climate, Conservation and Environment(NACCE)
Northeastern Minnesotans for Wilderness
Northern Rockies Conservation Cooperative
Old Mustache Canoe Paddles
Old-Growth Forest Network
Olympic Climate Action
Oregon Wild
Otsego County Conservation Association
Pacific Crest Trail Association
Park County Environmental Council
Pendergraft Outfitters
PennEnvironment
People & Pollinators Action Network
Piragis northwoods co
Projectic
Protect Ancient Forests
Protect Our Woods
Public Employees for Environmental Responsibility
Public Lands Conservancy
Quiet Use Coalition
Resource Renewal Institute
RESTORE: The North Woods
Rockbridge Conservation
Rocky Mountain Wild
Sage Steppe Wild
Salem Audubon Society
Save Massachusetts 3
Save Our Canyons

Sequoia ForestKeeper
Seven Capes Bird Alliance
Sheep Mountain Alliance
Shenandoah Valley Bicycle Coalition
Sierra Club
Sierra Foothills Audubon Society
Sierra Forest Legacy
Snake River Fund
Snowlands Network
Southeast Alaska Conservation Council
Southern Environmental Law Center
Southern Utah Wilderness Alliance
Speak For The Trees Too
Standing Trees
Student Public Interest Research Groups (PIRGs)
Sven-Saw
Swan View Coalition, Inc.
Tali Elohi
Tennessee Citizens for Wilderness Planning (Tcwp)
Tennessee Heartwood
Teton Backcountry Alliance
The Fire Restoration Group
The Forest Advocate
The Norbeck Society
The Wilderness Society
To Nizhoni Ani
Tree Action Seattle
Trees as a Public Good
Tucson Bird Alliance
Tuleyome
Umpqua Bird Alliance
Umpqua Watersheds
Upper Gila Watershed Alliance
Upper Valley Affinity Group (Vermont)
UU Earth Action
Virginia Wilderness Committee
Watershed Sciences
Wendell State Forest Alliance
West Virginia Highlands Conservancy
Western Leaders Network
Western Slope Conservation Center
Whatcom Forest Watch
White Mountain Conservation League
Wiconi un tipi
Wild Arizona
Wild Connections
Wild Northwest

Wilderness Workshop
Willamette Riverkeeper
Winter Wildlands Alliance
Wisconsin Environment
Women's Earth and Climate Action network
(WECAN)
Wyoming Outdoor Council
Wyoming Wilderness Association
Yaak Valley Forest Council