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September 17, 2025

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These comments were also submitted to www.regulations.gov, docket number FS-2025-0001

Thank you for the opportunity to comment on USDA's Notice of Intent (NOI) to rescind the 2001 Roadless Area Conservation Rule (Rule).

The National Association of Forest Service Retirees (NAFSR) is comprised of many hundreds of long-tenured, retired USDA Forest Service employees, who have unparalleled experience and expertise in all facets of National Forest management. This includes the development of the 2001 Roadless Rule, the development of the Colorado and Idaho Roadless Rules, and implementation of all the roadless rules.

Based on these experiences, we believe that the best path forward is neither keeping the 2001 Roadless Rule as is, nor totally rescinding it. The Rule should be dynamic. Reviewing and modification to make it more relevant for the times would be helpful. We encourage the States and communities of interest to be involved in the process.

Roadless Areas are a recognized resource that has existed for more than fifty years. Many activities prohibited in designated Wilderness are allowed in Roadless areas. These areas are

mostly free of roads because they are often located in steep and unstable terrain with poor site conditions that do not always support dense tree growth.

It is important to note that over the last 25 years since the Rule has been in place, a great deal of successful fuel treatments, including prescribed and other beneficial fire, have been accomplished in areas where the Rule applied. The Rule also provides exceptions for roads to access private land, mining claims, and allows motorized trails. However, it prohibits new permanent road construction. Numerous fire suppression activities, including the use of heavy motorized equipment, have been successfully carried out in roadless areas. Based on our experience, the argument that complete rescission of the Rule would lead to improved fuel treatments and fire suppression response may not hold.

Some of the timber in roadless areas is of low value, but in other areas that might not be the case. Building roads into these areas would require additional funding from the Forest Service's limited budget to cover road construction costs. Due to the terrain of many roadless areas, road construction would be very costly. The silvicultural prescriptions aimed at improving forest resiliency in these areas will likely not cover the expenses of building the roads.

When the rule was adopted in 2001, the Forest Service faced an extensive backlog of road maintenance. Although this backlog has decreased somewhat over the last 25 years thanks to road decommissioning efforts, the Forest Service has not seen a meaningful increase in road maintenance funding during that time period. The President's Budget Proposal for the Forest Service does not assure us that there will be an increase in funding for road construction or maintenance in the future.

The 2001 Rule helped some organizations feel more comfortable with how the areas were managed, especially Colorado and Idaho where litigation over Forest Service actions in roadless areas decreased. This is because the States and Forest Service collaborated to resolve the issue. The Rule also led to many successful collaborative efforts. If the Rule is revoked, we worry that there will be a return to the unproductive, costly and time-consuming litigious environment of the past.

It would also require environmental analysis (likely an EIS) and forest plan revision for almost every national forest outside of Idaho and Colorado. This NEPA (*National Environmental Policy Act*) process is necessary to determine the management objectives and actions that can be implemented in the formerly designated roadless areas. We are not sure why you would want to do this without creating state specific rules.

This approach aligns with Chief Schultz' goal of cooperative federalism which involves working in partnership with the states and stakeholders to manage these areas. So, as an alternative, NAFSR suggests the NOI be amended to include a third option, one for keeping the 2001 Rule in

place until each state goes through a process like what was successfully done in Idaho and Colorado. Both efforts allowed for more locally based public input and resulted in general agreement on how the roadless areas would be managed.

The Forest Service cannot adequately address the forest health and catastrophic wildfire issues in roaded areas of the National Forests because resources are rapidly shrinking. The agency has limited funds, equipment and personnel to maintain existing roads. Increased road access may help ground crews better suppress human-caused fires but also increases the risk of new fires started by people. It is important to remember that roadless areas are priceless resources offering many benefits, including critical wildlife habitat, more primitive recreation options, vital cold-water habitat for various fish species, tribal cultural sites and values, and excellent hunting and fishing opportunities. While building roads improves access, it can also lead to more human-caused wildfires.

As former employees, we prefer to see solutions that are stable across administrations. The Colorado and Idaho results show us there is a middle way that can gain broad support and will be stable. As you know, NAFSR advocates more active forest management on national forest system lands, and increased logging, when done properly and in suitable areas. We believe this combined with more prescribed fire will boost forest resilience. Considering all the contentious history around the roadless policy, we question whether withdrawing the 2001 Rule would quickly and effectively help achieve that goal.

We appreciate the opportunity to comment and remain available to help provide our knowledge and experience throughout this process.

Sincerely,

Steve Ellis

Steve Ellis, Chair
National Association of Forest Service Retirees