



September 3, 2026

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

Thank you for the opportunity to comment on the USDA Forest Service's Draft Environmental Impact Statement (DEIS) – 2001 Roadless Rule Recission.

The National Association of Forest Service Retirees (NAFSR) is comprised of well over one thousand long-tenured retired USDA Forest Service employees who have unparalleled experience and expertise in all facets of National Forest management. This includes development of the 1979 RARE II inventory, development of the 2001 Roadless Rule, along with the development of the Colorado and Idaho Roadless Rules. Most importantly, NAFSR members have direct experience with on-the-ground implementation of the 2001 Roadless Rule over the last 25 years.

We have reviewed the draft EIS and appreciate the inclusion of Alternative 3 - Modified Roadless Rule/Inventoried Roadless Area (IRA) Boundaries. It is important to note that our comment letter of September 17, 2025, responding to the Notice of Intent to rescind the 2001 Roadless Rule, suggested this type of alternative. As we pointed out in that letter, Roadless

Areas are a recognized resource that have existed for over fifty years, and there is much more to this issue than a binary decision to keep or rescind the 2001 Roadless Rule.

We do have serious concerns with the way Alternative #3 has been constructed. As currently proposed in the DEIS, this Alternative does not meet the intent of our earlier comments. It will reduce the area afforded protection by the 2001 Roadless Rule by over 70% using arbitrary criteria.

The use of a ½ mile road buffer to exclude areas from consideration as Roadless Areas was not addressed in either the 1979 RARE II inventory or the 2001 Roadless Rule. Its insertion into this alternative seems to be an attempt to simply reduce roadless area acres without an explanation of why this would address the evaluation criteria used in the 1979 RARE II Inventory or the 2001 Roadless Rule EIS. This change would complicate project level implementation for no added benefit.

Additionally, the use of nationally imposed Wildland Urban Interface (WUI) Boundaries, using Community Wildfire Protection Plans (CWPP's) or another arbitrary 1.5-mile buffer around communities and evacuation routes without a CWPP in place, is also questionable. Both science and experience have shown that this type of national, top-down approach has been less than effective at protecting communities while ensuring the values provided by Roadless Areas continue to be available to the American public.

As such, we recommend that Alternative 3 be selected by the Deciding Officer, with the following revisions:

- 1) Drop the ½ mile road buffer and subsequent reduction in Roadless Area Acres;
- 2) Remove the 1.5 mile buffer in HFRA WUI areas and subsequent reduction in Roadless Area Acres. Instead, amend the WUI description in Alternative 3 by continuing to use existing CWPP's; and in areas without approved CWPP's, use the WUI definition from the Healthy Forest Restoration Act (HFRA);
- 3) Require each Forest Supervisor to identify critical treatment areas (using CWPP's or the HFRA WUI definition), within designated WUI areas that are also within IRAs, that are needed to protect communities and evacuation routes. Modify the boundaries of IRAs within the WUI areas based on a site-specific analysis supporting the need to achieve fuels treatment goals;
- 4) Delegate the decision to modify IRA boundaries to the local Forest Supervisor. The subsequent boundary changes and acres involved should be reported to the Chief annually. This best protects local communities, while ensuring the decisions are made at the field level, based on local knowledge with transparency to the public.

Additionally, given our organization's belief that the best decisions about land management come from the folks closest to the ground, not those in the Chief's Office or USDA, we recommend that all authority for all fire suppression activities, including the use of motorized

equipment in Roadless Areas, be delegated to the Forest Supervisor, who may delegate further to the local District Ranger.

We believe the selection of Alternative 3, with the revisions we have put forth, best meets the need for active fuels management treatment while ensuring that the Roadless Areas values that so many have cherished for so long are not unduly impacted.

We want to reiterate, as we stated in our September 17, 2025, comment letter that “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. Existing 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.”

We appreciate the opportunity to comment and remain available to share our knowledge and experience to help manage the American public’s National Forests.

Bill Avey

Bill Avey, Chair
National Association of Forest Service Retirees