

September 15, 2025

The Honorable Brooke Rollins
Secretary of the U.S. Department of Agriculture
Chief Tom Schultz
USDA Forest Service
1400 Independence Avenue, SW
Washington, DC 20250

Madam Secretary & Chief Schultz:

We appreciate the opportunity to comment on USDA's Notice of Intent (NOI) to Rescind the 2001 Roadless Area Conservation Rule (Rule). The Rule was developed or administered during our tenure in Forest Service leadership positions including as Chief, during both Republican and Democratic administrations. We are very familiar with both the Rule and associated issues. Hopefully our perspective, comments and suggestions will be useful and carefully considered.

Given that the Rule was promulgated 24 years ago, we agree that a review of the Rule may be helpful in the future management of the 44 million acres of some of the most remote backcountry land of the national forest system. However, statements from the Administration (USDA) seem only to highlight challenges with no acknowledgement of the benefits or rationale for the 2001 Rule. Yes, much has changed over the past nearly quarter century, but much also remains unchanged. More important, much has improved.

The NOI provides two alternatives: Total rescission or no action. Based on our experience, we believe a total repeal of the Rule will result in many more problems than it fixes and be more costly in the long run. Turning the clock back to the 1990's will reignite the onerous issues, divisive controversies, and costly litigation associated with that era.

We urge you to consider additional alternatives that would require a collaborative, transparent process to identify potential changes that would protect roadless values and allow additional flexibility for addressing wildfire risks to communities.

The preamble of the 2001 Rule has a thorough review of "Roadless Area Values and Characteristics." They bear repeating here, as they are so vital:

Inventoried roadless areas considered in this rule constitute roughly one-third of all National Forest System lands, or approximately 58.5 million acres. Although the inventoried roadless areas comprise only 2% of the land base in the continental

United States, they are found within 661 of the over 2,000 major watersheds in the nation (FEIS Vol. 1, 3-50) and provide many social and ecological benefits.

As urban areas grow, undeveloped private lands continue to be converted to urban and developed areas, and rural infrastructure (such as roads, airports, and railways). An average of 3.2 million acres per year of forest, wetland, farmland, and open space were converted to more urban uses between 1992 and 1997. In comparison, 1.4 million acres per year were developed between 1982 and 1992. The rate of land development and urbanization between 1992 and 1997 was more than twice that of the previous decade, while the population growth rate remained fairly constant (FEIS Vol. 1, 3-12). In an increasingly developed landscape, large unfragmented tracts of land become more important. For example, from 1978 to 1994, the proportion of private forest ownerships of less than 50 acres nearly doubled (Birch, T.W. 1996. Private forest-land owners of the United States, 1994. Resource Bulletin NE-134. Radnor, PA: USDA Forest Service, Northeastern Experiment Station. 183 p). Subdivision and other diminishment of tract size of these lands can discourage long-term stewardship and conservation.

Inventoried roadless areas provide clean drinking water and function as biological strongholds for populations of threatened and endangered species. They provide large, relatively undisturbed landscapes that are important to biological diversity and the long-term survival of many at risk species. Inventoried roadless areas provide opportunities for dispersed outdoor recreation, opportunities that diminish as open space and natural settings are developed elsewhere. They also serve as bulwarks against the spread of non-native invasive plant species and provide reference areas for study and research (FEIS Vol. 1, 1-1 to 1-4).

The following values or features often characterize inventoried roadless areas (FEIS Vol. 1, 3-3 to 3-7):

High quality or undisturbed soil, water, and air. These three key resources are the foundation upon which other resource values and outputs depend. Healthy watersheds catch, store, and safely release water over time, protecting downstream communities from flooding; providing clean water for domestic, agricultural, and industrial uses; helping maintain abundant and healthy fish and wildlife populations; and are the basis for many forms of outdoor recreation.

Sources of public drinking water. National Forest System lands contain watersheds that are important sources of public drinking water. Roadless areas within the National Forest System contain all or portions of 354 municipal watersheds

contributing drinking water to millions of citizens. Maintaining these areas in a relatively undisturbed condition saves downstream communities millions of dollars in water filtration costs. Careful management of these watersheds is crucial in maintaining the flow and affordability of clean water to a growing population.

Diversity of plant and animal communities. Roadless areas are more likely than roaded areas to support greater ecosystem health, including the diversity of native and desired nonnative plant and animal communities due to the absence of disturbances caused by roads and accompanying activities. Inventoried roadless areas also conserve native biodiversity by serving as a bulwark against the spread of nonnative invasive species.

Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land. Roadless areas function as biological strongholds and refuges for many species. Of the nation's species currently listed as threatened, endangered, or proposed for listing under the Endangered Species Act, approximately 25% of animal species and 13% of plant species are likely to have habitat within inventoried roadless areas on National Forest System lands. Roadless areas support a diversity of aquatic habitats and communities, providing or affecting habitat for more than 280 threatened, endangered, proposed, and sensitive species. More than 65% of all Forest Service sensitive species are directly or indirectly affected by inventoried roadless areas. This percentage is composed of birds (82%), amphibians (84%), mammals (81%), plants (72%), fish (56%), reptiles (49%), and invertebrates (36%).

Primitive, Semi-Primitive Non-Motorized, and Semi-Primitive Motorized classes of dispersed recreation. Roadless areas often provide outstanding dispersed recreation opportunities such as hiking, camping, picnicking, wildlife viewing, hunting, fishing, cross-country skiing, and canoeing. While they may have many Wilderness-like attributes, unlike Wilderness the use of mountain bikes, and other mechanized means of travel is often allowed on designated trails. These areas can also take pressure off heavily used wilderness areas by providing solitude and quiet, and dispersed recreation opportunities.

Reference landscapes. The body of knowledge about the effects of management activities over long periods of time and on large landscapes is very limited. Reference landscapes of relatively undisturbed areas serve as a barometer to measure the effects of development on other parts of the landscape.

Natural appearing landscapes with high scenic quality. High quality scenery, especially scenery with natural-appearing landscapes, is a primary reason that people choose to recreate. In addition, quality scenery contributes directly to real estate values in nearby communities and residential areas.

Traditional cultural properties and sacred sites. Traditional cultural properties are places, sites, structures, art, or objects that have played an important role in the cultural history of a group. Sacred sites are places that have special religious significance to a group. Traditional cultural properties and sacred sites may be eligible for protection under the National Historic Preservation Act. However, many of them have not yet been inventoried, especially those that occur in inventoried roadless areas.

Other locally identified unique characteristics. Inventoried roadless areas may offer other locally identified unique characteristics and values. Examples include uncommon geological formations, which are valued for their scientific and scenic qualities, or unique wetland complexes. Unique social, cultural, or historical characteristics may also depend on the roadless character of the landscape. Examples include ceremonial sites, places for local events, areas prized for collection of non-timber forest products, or exceptional hunting and fishing opportunities.

The values and importance of these remote back country places have increased in the past 25 years as more of this nation's private forest and farmland is developed and urbanized.

There is the assertion that the Rule restricts fire prevention and wildfire suppression efforts and that more flexibility is needed to reduce fire risk near the urban-wildland interface. The 2001 Rule specifically permits activities aimed at preventing and mitigating wildfire risks. In fact, nearly 2 million acres of roadless areas have been treated to reduce fire risk in recent years. Significantly more resources need to be directed toward the critical work of reducing fire risk in and around human habitation-the wildland urban interface.

The 2001 Rule allows hazardous fuel reduction, livestock grazing, off-highway vehicle (OHV) riding, energy development including oil and gas leasing, hardrock mining, and the entire spectrum of back country recreation. Are there changes in the past 25 years that require additional allowances or exceptions? If so, we encourage an open conversation with the community of interests to address potential changes to the Rule.

The fiscal issues and economics associated with roadless areas need to be carefully considered. Commercial timber sales in roadless areas have largely been financial losers. The cost of road construction in Roadless areas is nearly always higher than other areas

because most are rugged and mountainous remote terrain with unstable soils. A key reason roadless areas remain roadless is the easy-to-get high value old growth has been gone for decades and little remains. The totality of ecosystem services roadless lands provide is vital and far exceeds their *de-minimis* extractive commodity values.

The idea to use the local land management planning process to administer inventoried roadless areas sounds attractive. However, this same approach failed in the past. The issues simply could not be resolved at the forest plan or district project level. This was a key reason we decided a national rule was needed. Even Congress was unable to reach consensus on resolution of the future of roadless areas. Bringing the issue into the Chief's Office took a major conflict off the table at the field level enabling other important work to be accomplished. Overall, the 2001 Rule has been successful as have the Colorado and Idaho revisions.

In 2001 there were over 380,000 miles of roads on Forest Service lands carrying an \$8.4 billion maintenance backlog—a taxpayer liability. This mileage is enough to go to the moon and half-way back. This begs the question; how many roads do we really need within the national forest system and how much do they cost to maintain? The maintenance backlog on roads and other Forest Service facilities has gotten worse and will continue to degrade as more personnel are fired or leave the agency and budgets are cut. Why invest in new roads when the Forest Service cannot maintain its existing infrastructure investments?

Prior to the 1990's, the Forest Service was able to grow so effectively because it relied on the receipts from timber sales to pay for staff and the timber industry to work on its failing road system. We need to face reality. The easy to access timber has been cut. The primary role of the Forest Service should be in stewardship and restoration activities that protect human communities from fire and restore the health of the land.

The Forest Service would do well to remember that 80 percent of its road budget was cut as a surrogate to stop the agency from building roads in roadless areas and selling old growth. Road maintenance became a major issue and roadless areas took center stage for political, environmental and budgetary reasons. This led to the suspension of road building and subsequent development of the 2001 Roadless Rule.

The roadless debate has a storied history, while very complex, it largely revolves around cultural, social, economic and environmental values that are important to the citizen owners who care for and depend upon public lands. You can find [Chapter 5 of the book *From Conquest to Conservation: Our Public Land Legacy* \(here\)](#) written in 2003. It chronicles the history of the roadless area debates and dissects the complexities of the issues we faced in the 1990's. Hopefully, you will find this helpful.

We hope our perspectives and suggestions will be carefully considered. We remain convinced that repealing the 2001 Rule will not be in the long-term interest of the American people, Forest Service employees, and the communities they serve.

Sincerely,

/s/ Mike Dombeck

/s/ Dale Bosworth

/s/ Tom Tidwell

/s/ Vicki Christiansen

Former Forest Service Chiefs

CC: House & Senate Committees

Enclosure: [Chapter 5 of the book *From Conquest to Conservation: Our Public Land Legacy*](#).
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