



September 11, 2026

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

I am a retired Forest Service wildlife biologist who is familiar with roadless lands from recreating and working in them in several western states. Most of my career was focused on managing habitat to maintain or enhance healthy fish and wildlife populations. I am writing as Chair of the Ninemile Wildlife Workgroup which works on promoting healthy wildlife populations and habitat connectivity in our area of Montana.

We oppose rescinding the 2001 Roadless Rule as these lands provide a myriad of benefits to our environment, to our fish and wildlife, and to our society. Note that we are one of the 99 percent of the commentors who opposed rescinding the rule in our comment letter of September 17, 2025, in response to the Notice of Intent.

Part of the stated Rationale for the Proposed Rule from the 2001 Roadless Area Conservation Rule Rescission Draft Environmental Impact Statement (DEIS) is “The 2001 Roadless Rule limited the Forest Service’s ability to conduct vegetation management within inventoried roadless areas and has contributed to the lack of active management of the national forests, which has contributed to challenges in addressing forest health concerns. The 2001 Roadless Rule prohibited cutting, sale, or removal of timber—except when one of a limited set of exceptions applied. Furthermore, the limited number of roads within inventoried roadless areas and the inability to reconstruct or build new roads to provide the needed access further limit management flexibility.”

In fact, exceptions to the rule have been commonly used in roadless areas. According to an online article in Trout Unlimited by Corey Fisher on Aug 12, 2025, “Throughout the western

U.S., 1 in 5 acres treated to reduce hazardous fuels—and reduce fire risk—have been in roadless areas. Over 9,000 miles of motorized trails across twelve western states are located within roadless areas.” The effects section of the DEIS states that “There are currently about 9,500 miles of roads within the potentially affected IRAs (9,400 miles of NFS roads, 100 miles of private roads)”. The Forest Service Activity Tracking System data shows that over the last decade within IRAs an average of 500 acres per year of timber harvest and a total of 1.8 million acres of hazardous fuels were reduced.

In Montana, human activity is the leading cause of wildfires, followed by lightning. Increasing human presence in roadless areas will result in more human caused wildfires. Aerial firefighting is an increasingly efficient and larger portion of initial attacks. Air resources coupled with smoke jumpers and helitack crews reduce the need for early road access by ground based fire crews.

The DEIS states “In general (for alternatives 2 and 3), impacts from road construction and timber harvest activities could include: increased fire frequency (human-caused), reduction in primitive or semi-primitive recreational settings; sedimentation and impacts to water quality; landscape fragmentation; adverse impacts to threatened, endangered, or sensitive wildlife and plants; loss of scenic character; impacts to tribally important resources; or economic losses related to recreation or non-commodity values of roadless areas.”

It would be more accurate to say that these negative impacts will likely include rather than could include. Other negative impacts will likely include:

- the spread of invasive weeds,
- loss of biodiversity (increasing habitat fragmentation, loss of connectivity, negative edge effects, and human disturbance),
- soil erosion and compaction,
- loss of soil productivity,
- increased potential for landslides,
- reduced transpiration,
- increased water runoff, and
- loss of carbon storage accelerating climate change.

Importantly, the quality of life will diminish for people that value the existence of roadless areas and the ecosystem services and recreation benefit they provide.

The DEIS states “The Forest Service maintains and administers approximately 368,000 miles of roads on National Forest System lands. There are currently about 9,500 miles of

roads within the potentially affected IRAs. NFS road mileage, deferred maintenance and management cost increases will occur under alternatives 2 and 3.

In 2024, the Forest Service estimated a deferred maintenance backlog of \$6.9 billion for roads and bridges. This estimate is based on passenger car roads only.”

Repairing these backlogged roads should be a priority to prevent resource damage. Building additional roads will only increase the need for maintenance and exposure to resource degradation.

Biological Assessments for the proposed rule were done for species protected by the Endangered Species Act. Those assessments determined that removing the Roadless Rule could adversely affect over 300 species. This could lead to multiple extinctions,

We will close by repeating what was stated in our first letter.

Rescinding the roadless rule seems to ignore the many benefits that roadless areas provide. Following is a brief synopsis of some of those benefits:

Wildlife

Roadless areas provide critical habitat for many species including rare and endangered wildlife. Grizzly bears¹, Canada lynx, and wolverines avoid roaded areas. Many species depend on roadless areas free from human disturbance for their survival. Roadless lands serve as critical habitat connectivity areas between national parks and forest lands allowing wildlife to disperse and promote genetic fitness, especially important for wide ranging carnivore species such as grizzly bears and Canada lynx. Elk, a popular and economically important game species, will also move to roadless areas to escape hunting pressure.

Biodiversity

Roadless areas, large areas where natural processes are the norm, are increasingly rare. Wild areas are important for biodiversity and serve as refuges for species that have little suitable habitat left. As mentioned earlier, invasive plant species increases are associated with roads. Roadless areas allow native plant ecosystems to thrive along with the myriads of wildlife and insect species that depend on them.

¹ Mattson, D. J. (2024). Roads, Residences and Grizzly Bears: Effects of Human Infrastructure on Brown and Grizzly Bears. Grizzly Bear Recovery Project Report, GBRP-2024-1.

Water

Streams and rivers in roadless areas provide cool temperatures and sediment reduced water that is critical for listed and rare species such as bull trout and west-slope cutthroat trout. Roads and other management activities increase sediment loads and water temperature that would not only increase risk to these species but also reduce downstream water quality for other aquatic species and human needs for irrigation and community water systems.

Recreation

Quiet recreation activities such as nature study, hiking, biking, and horseback travel are an important part of many people's lives. Places to pursue these activities are shrinking in our developing world. Public agencies should strive to protect the roadless areas we have left to allow us to slow down and recharge, find solace and spiritual renewal. Protecting the scenic vistas of roadless areas enhances economic value and benefits our quality of life.

Climate Resilience

Roadless areas store carbon in the vegetation, maintain healthy watersheds that are especially important for rare and listed salmonids, and buffer climate change impacts.

Summary

We oppose rescinding the 2001 Roadless Rule. Inventoried Roadless Areas provide a myriad of benefits to our environment, to our fish and wildlife, and to our society as outlined above. Removing restrictions on road construction and timber harvest would harm those values, some to the point of not being recoverable. We ask that you do not rescind the Roadless Rule and select the no action alternative.

Sincerely,



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