



FSEEE

Forest Service Employees
for Environmental Ethics

Citizens Working Together to Save our Forests

Defending the 2001 Roadless Area Conservation Rule

The U.S. Department of Agriculture intends to rescind the 2001 Roadless Area Conservation Rule in its entirety, **stripping protection from 44.7 million acres of the wildest national forest land** in the United States. The USDA published the proposed rescission rule Aug. 20, and public comments are due Sept. 21.

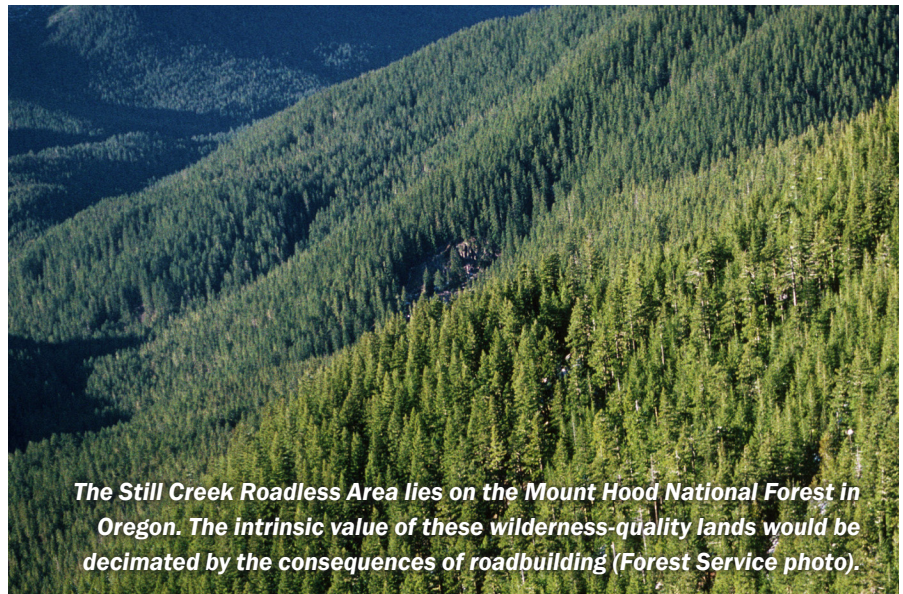
We have one month to respond, and we need your voice.

The Ag Department frames this as a measure to combat wildfire and to return authority to local forest managers. Its own proposal says otherwise, conceding that the acreage where timber harvest is both operable and permitted (by its own forest plans) totals roughly **4.8 million acres — about 16 percent of forested roadless land** — and that the resulting opportunities would be **“modest and localized.”** Rescinding the Roadless Rule will not deliver forest health; it will permanently damage high-value, unfragmented ecosystems and vital habitat.

CONSERVATION VALUES

Inventoried roadless areas are the crown jewels of the National Forest System. They have remained roadless because they lie in the most rugged and remote terrain in the system. Building and maintaining roads in these areas have never offered a “return on investment” due to exorbitant costs.

These pristine landscapes are biological strongholds. The Forest Service’s 2001 Record of Decision states that **roadless areas provide critical habitat for roughly 25 percent of endangered animal species and 13 percent of endangered plant species.** Peer-reviewed research published in *PLOS Water* found that these areas serve as the primary protection mechanism for more than 62,000 miles of rivers and for watersheds that supply drinking water to **25 million Americans.**



The Still Creek Roadless Area lies on the Mount Hood National Forest in Oregon. The intrinsic value of these wilderness-quality lands would be decimated by the consequences of roadbuilding (Forest Service photo).

Roads are the primary cause of habitat fragmentation, sedimentation, and invasive species introduction in forest ecosystems. Road density is among the strongest predictors of declining elk, grizzly, and salmon populations. Road construction strips protective vegetation, causes erosion, degrades water quality, and triggers landslides that deposit debris into spawning gravels and municipal water supplies. A Forest Service and BLM study of 1,290 landslides in Oregon and Washington attributed 52 percent to roads. Once road construction fragments these natural landscapes, restoration becomes virtually impossible.

RECREATION VALUES AND RURAL ECONOMIES

Roadless areas are the economic backbone of hundreds of rural communities. The outdoor recreation economy accounted for 2.4 percent of U.S. GDP — \$696.7 billion — and 5.2 million jobs in 2024. Roadless areas encompass more than 43,000 miles of trails, 11,000 climbing routes, and 1,000 whitewater runs. They anchor the backcountry hunting and fishing opportunities that draw visitors to small towns across the West. Unlike a resource-damaging, once-in-a-lifetime timber sale, the recreation economy delivers exponential benefits year after year. **Trading sustainable recreation for one-time resource extraction is not economic development. It is exploitation.**

NOT SUPPORTED BY SOUND SCIENCE

The Department's central public argument is that roadless protections prevent managers from reducing wildfire risk. This claim is false.

- The 2001 Roadless Rule already allows hazardous fuels treatment as demonstrated by roughly 2 million acres already treated under the Rule. Appropriations and workforce capacity limit treatments, not the Roadless Rule.
- **Roads facilitate fires.** A 2026 study in *Fire Ecology* examining every national forest ignition from 1992 to 2024 found a density of 7.99 fires per 1,000 hectares within 50 meters of a road versus 1.97 in inventoried roadless areas — four times higher near roads. **Roads are ignition corridors**, and about 89 percent of wildfires nationally are human-caused. Far from preventing wildfire, building roads boosts wildfire ignitions.

FISCALLY RESPONSIBLE BUDGETING

Building a road is among the most expensive undertakings in any national forest, and that doesn't account for road maintenance, which the Forest Service infamously neglects. The Forest Service already manages roughly 380,000 miles of road — nearly eight times the length of the Interstate Highway System — and already carries a \$6.9 billion deferred maintenance backlog for roads and bridges. The agency receives a fraction of the funding needed to maintain existing roads.

Timber sales in remote roadless terrain routinely generate more expenditures than revenues, **requiring taxpayers to subsidize logging their own land.** Timber sales that require taxpayer subsidies demonstrate an utter lack of fiscal responsibility; therefore, the Ag Department's revenue

estimate of \$5-11 million deserves a hard look. Those numbers represent gross receipts under an “unlikely” maximum-harvest scenario that fails to calculate any expenses — not sale preparation, not environmental analysis, not contract administration, not road construction, and not the long-term maintenance obligation every new road creates.

The agency’s own history shows what happens when those costs are counted. In the 2018 fiscal year, the Forest Service spent \$388 million on its Forest Products Program and collected \$41 million in receipts; in fiscal 2020, it spent more than half a billion dollars and collected only \$110 million. On the Tongass, where this rescission reaches furthest, timber sales burned through taxpayer monies totalling \$1.73 billion between 1980 and 2019.



The Tongass National Forest safeguards more than 9 million acres of inventoried roadless areas.

Executive Order 12866 requires an accounting of net benefits, not gross receipts. FSEEE will ask USDA to disclose the net figure — receipts minus the cost of access — before it finalizes this rule. Meanwhile, roadless lands generate an estimated \$24 billion a year in public benefits. Rescission trades a permanent dividend for a temporary cashout followed by lasting debt.

“LOCAL DECISION-MAKING” IS NOT A SUBSTITUTE FOR THE PUBLIC RECORD

The Forest Service’s own 2001 rulemaking record explains why delegating these decisions fails. **Forest-by-forest approvals do not account for the national significance of roadless values**, and the cumulative result is the irreversible, piecemeal loss of intact landscapes that belong to all Americans. That reasoning is stronger today, not weaker.

The proposal also shifts the burden of defending these lands from one national rule onto thousands of site-specific project reviews — a burden that falls hard on Tribes, rural communities, and local conservation and advocacy groups. The USDA acknowledges in the proposal that the majority

sentiment among Tribal governments is opposition, and that rescission would have substantial direct effects on Tribes. Local flexibility that overrides local opposition is not local control.

Promulgating the Roadless Rule in 2001 involved more than 600 public meetings and drew more than 1.6 million comments with roughly 95 percent supporting protection at a time when most comments arrived by mail. Last September, the USDA's notice of intent to rescind the Roadless Rule drew 625,737 comments; an independent analysis found **99 percent of those comments opposed rescission.**

Support for rescinding the Rule was statistically indistinguishable from zero. Independent polling has consistently shown that three out of four Americans support the Rule, with rural respondents as supportive as urban ones. That level of consensus has no parallel in the history of federal rulemaking. The agency should honor it!

TAKE ACTION BEFORE SEPTEMBER 21

Please submit a comment opposing the rescission:

Go to [regulations.gov](https://www.regulations.gov) and search Docket No. **FS-2025-0001** or **RIN 0596-AD66**. Follow the instructions for sending comments. Comments must be submitted by Sept. 21.

Form letters count for little. Substance counts. **Tell the agency what these places are worth to you** — the watershed above your community, the family elk hunt or fishing trip, the trail you walk to find quiet, the natural setting that helps you unwind and reboot.

If you have professional experience — as a guide, a watershed manager, a forester, a wildlife ecologist, a wildland firefighter, a civil engineer, or a tourism promoter — speak up and share what you know. If you are or were a Forest Service employee, your firsthand account of what the Rule does and does not do would be incredibly valuable.

If you are able, please consider contributing to FSEEE via one of the methods noted on the enclosed reply card. FSEEE is on the front lines of this fight, advocating for the agency to practice stewardship grounded in science and law. Your support funds that work and helps ensure the people inside the Forest Service who believe in its conservation mission have a voice.

The Roadless Rule has protected wild places for a quarter century. With your comments, it can protect them for generations more.

Respectfully,



Kevin Hood
Executive Director
Forest Service Employees for Environmental Ethics