FSEEE Forest Service Employees for Environmental Ethics

P.O. Box 11615 | Eugene, OR 97440 | 541-484-2692

September 29, 2026

Via email to: SM.FS.WOFOIA@usda.gov
FOIA Service Center, USDA Forest Service Washington Office
1400 Independence Ave., SW, Code 1123
Washington, DC 20250

Re: FOIA Request — Resource Specialist Analyses Underlying the 2001 Roadless Rule Rescission Draft Environmental Impact Statement (Docket No. FS-2025-0001; RIN 0596-AD66)

Dear FOIA Officer:

Under the Freedom of Information Act, 5 U.S.C. § 552, and USDA's implementing regulations, 7 C.F.R. part 1, subpart A, Forest Service Employees for Environmental Ethics (FSEEE) requests copies of the records described below.

Background

In August 2026 the Forest Service released the *2001 Roadless Area Conservation Rule Rescission Draft Environmental Impact Statement* (DEIS), together with supporting analysis materials. Those materials include the Economic Analysis, Draft Biological Assessments, Draft Biological Evaluation, and Tribal Summary Impact Statement. They do not include the resource specialist reports or other interdisciplinary analyses on which the DEIS's resource sections rely.

Records requested

For the period **July 1, 2025, to the date of search**, FSEEE requests:

1. **Specialist reports.** All resource specialist reports, resource reports, technical reports, or equivalent analyses, final or draft, prepared for the DEIS, including those addressing:
   - fire and fuels management;
   - vegetation, forest management, and forest health (including insects and disease);
   - soil, water, and aquatic resources, including municipal water;
   - wildlife, fish, and biodiversity;
   - roads and transportation;
   - recreation, scenery, and designated areas;
   - social and economic effects.
2. **Drafts of three DEIS passages.** All drafts, with any comments, tracked changes, or redlines, of the DEIS passages addressing:
   - (a) hazardous fuels treatment in inventoried roadless areas, including the discussion of Healey (2020) at DEIS page 96;

- (b) the statement that "a lack of roads has not prevented fire prevention or protection measures" (DEIS at 105, 139, 157, 218);
- (c) insect and disease risk in inventoried roadless areas, including Table 14 (DEIS at 67).

3. **Communications about those passages.** Communications (including email and attachments) among Forest Service or USDA personnel, or with contractors, concerning the characterization of Healey (2020) or of the planning studies cited at DEIS page 96 (North et al. 2015; Ager et al. 2021; Woolsey et al. 2024).

4. **Plan-direction and operability methods.** Records documenting the methodology, coding protocol, or crosswalk used to classify land management plan direction ("allowed," "generally allowed," "generally not allowed," "not allowed") and timber operability ("likely operable," "likely operable but complex," "likely not operable") in DEIS Appendix 1, including any unit-level tables or spreadsheets.

5. **Economic Analysis workpapers.** Spreadsheets, workpapers, or calculation files supporting Tables 1, 4, and 6 of the *Cost Benefit Analysis and Consideration of Impacts on Small Entities* accompanying the proposed rule.

6. **Alaska subsistence and the Chugach.** Records reflecting consideration of whether to prepare an ANILCA § 810 evaluation for this rulemaking, and records addressing the rulemaking's effects on the Chugach National Forest.

7. **Team roster.** A list of interdisciplinary team members and resource specialists for the DEIS, showing their assigned resource areas. A list or organizational document suffices; FSEEE does not seek personal information beyond names, titles, and assignments.

Likely custodians: Ecosystem Management Coordination staff; members of the DEIS interdisciplinary team; Alaska Region (Region 10) planning and subsistence staff; and staff responsible for the Economic Analysis.

Format

FSEEE requests records in electronic form, in their native format where practicable (for example, spreadsheets as .xlsx or .csv), delivered by email or secure download. FSEEE requests rolling production as records become available, beginning with Item 1.

As an alternative to, or in addition to, direct delivery, FSEEE would welcome the Forest Service posting the responsive records on the rulemaking's project webpage, so they are available to all members of the public at once. If the Forest Service does so, FSEEE asks to be notified of the posting, and asks that this request remain open for any records not posted.

Exemptions and segregability

If any record or portion is withheld, FSEEE asks that the Forest Service identify the exemption claimed for each withholding. FSEEE also asks that the Forest Service release all reasonably segregable non-exempt material, 5 U.S.C. § 552(b), and apply the foreseeable-harm standard of 5 U.S.C. § 552(a)(8). Factual material within draft or deliberative documents is generally segregable.

Fee waiver request

FSEEE requests a waiver of all fees under 5 U.S.C. § 552(a)(4)(A)(iii) because disclosure is in the public interest and not primarily in FSEEE's commercial interest:

- **Subject of the request.** The records concern identifiable operations and activities of the government. They pertain to the administration of 44.7 million acres of public lands, and to the Forest Service resource specialists' assessment of how rescinding the 2001 Roadless Rule would affect those lands and their resources and values, including water, fish and wildlife, fire, and recreation.
- **Informative value.** The requested analyses are not in the public record. Their release would show how resource specialists' findings were carried into the DEIS, contributing significantly to public understanding of a rulemaking that has drawn more than 625,000 submissions. The public cannot now evaluate whether the DEIS accurately reflects the agency's own expert analysis; these records would allow it to do so while the decision remains pending.
- **Ability and intent to disseminate.** FSEEE is a national nonprofit conservation organization whose members include current and former Forest Service employees. It publishes a quarterly newsletter, *Forest News*, distributed in print and electronically to approximately 40,000 readers interested in public lands issues. It maintains a website, www.fseee.org, where it posts regularly on public lands news and issues and which receives 3,000 to 5,000 visits per month. FSEEE staff also speak regularly with journalists about issues affecting the Forest Service, the national forests, and the administration of public lands. FSEEE intends to analyze the requested records and to share that analysis, and the records themselves where appropriate, through each of these channels, as well as in its formal comments and objections.
- **No commercial interest.** FSEEE is a 501(c)(3) nonprofit and has no commercial interest in the records.

If the fee waiver is denied, FSEEE asks that the Forest Service state the basis for the denial and inform FSEEE of its appeal rights. FSEEE may be willing to pay fees and asks to be consulted in that event.

Contact

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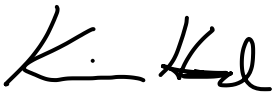
FSEEE is happy to discuss the scope of this request to facilitate timely processing, including prioritizing Items 1 and 2.

Thank you for your assistance.

Sincerely,



Kevin Hood
Executive Director
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