

OUTDOOR ALLIANCE

August 7, 2025

Senator Mike Lee
Chair, Senate Energy and Natural
Resources Committee
363 Russell Senate Office Building
Washington, DC 20510

Senator Martin Heinrich
Ranking Member, Senate Energy and
Natural Resources Committee
709 Hart Senate Office Building
Washington, DC 20510

Rep. Bruce Westerman
Chair, House Natural Resources
Committee
202 Cannon House Office Building
Washington, DC 20515

Rep. Jared Huffman
Ranking Member, House Natural
Resources Committee
2330 Rayburn House Office Building
Washington, DC 20515

RE: Outdoor recreation community support for the Forest Service Roadless Rule

Chairs Lee and Westerman, Ranking Members Heinrich and Huffman, and
Committee Members,

On behalf of the human-powered outdoor recreation community, we write to express our strong support for the U.S. Forest Service's (USFS) 2001 Roadless Area Conservation Rule (Roadless Rule).¹ For nearly a quarter century, the Roadless Rule has provided sound and flexible management for many of America's best backcountry recreation opportunities while also providing countless other benefits for water quality, wildlife habitat, and other environmental and economic values. Rescinding the rule, as the U.S. Department of Agriculture (USDA) recently proposed,² would put these benefits at risk. We encourage Congress to pass the Roadless Area Conservation Act of 2025 (S. 2042/H.R. 3930), which would codify the Roadless Rule and provide lasting protection for these iconic landscapes.

Outdoor Alliance is a coalition of nine member-based organizations representing the human powered outdoor recreation community. The coalition includes Access

¹ Special Areas; Roadless Area Conservation, 66 Fed. Reg. 3244 (Jan. 12, 2001).

² U.S. Dep't of Agriculture, Press Release No. 0141.25, *Secretary Rollins Rescinds Roadless Rule, Eliminating Impediment to Responsible Forest Management* (June 23, 2025).



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Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

The Roadless Rule protects more than 58 million acres of National Forests across the U.S. in a way that flexibly allows access for a wide variety of recreation opportunities ranging from backpacking to motorized recreation. The Rule itself is both effective and straightforward. It generally prohibits roadbuilding in inventoried roadless areas (IRAs) with commonsense exceptions for public safety and existing rights, and places reasonable limits on logging that provide land managers with the flexibility needed to mitigate the risk of wildfire to both communities and ecosystems.

Our community values these areas for the opportunities they provide for climbing, hiking, mountain biking, paddling, and backcountry skiing. According to maps from Outdoor Alliance's GIS Lab, roadless areas protect more than 8,743 climbing routes and bouldering problems, 782 miles of whitewater paddling runs (in addition to critically important headwaters), 26,647 miles of trail, and 19,596 miles of mountain biking. Roadless areas are found in 42 states and Puerto Rico, and they are home to recreation gems like:

- Hiking, backcountry skiing, and mountain biking near Emerald Bay in Lake Tahoe;
- Alpine summits like Wyoming's Franc's Peak;
- Montana's Hyalite Canyon, a world-renowned ice climbing destination;
- Climbing and backcountry skiing at Washington Pass and Liberty Bell at the headwaters of Washington's Methow Valley;
- Popular day hikes including Graveyard Fields, Black Balsam Knob, and Sams Knob on North Carolina's Pisgah National Forest;
- Whitewater paddling along the Wild & Scenic Tuolumne River;
- Mountain biking on the Maah Daah Hey Trail in western North Dakota, Kettle Crest of Washington, and Tea Creek Mountain in West Virginia;
- Multi-pitch climbing at Cochise Stronghold in Arizona;



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- Stellar hiking and camping adjacent to the Dolly Sods and Otter Creek Wilderness in West Virginia; and
- Endurance trail running on the Dog Canyon Trail on New Mexico's Lincoln National Forest.

The Roadless Rule's core limitation on road building protects a backcountry setting that many recreationists value and seek out. The undeveloped character of these areas enables recreationists to challenge themselves and escape the crowds that are more common to roaded, developed areas of National Forests. For recreational pursuits not compatible with designated Wilderness, such as mountain biking, IRAs are often *the best* places to experience backcountry recreation. Rescinding the Roadless Rule would put these recreation opportunities at risk by removing an essential nationwide protection for backcountry areas of National Forests.

Outdoor recreation in IRAs also supports America's \$1.2 trillion outdoor recreation economy. IRAs are often highly scenic areas that contain popular backpacking loops, whitewater runs, multi-pitch climbing routes, and other recreation resources that visitors spend money and travel long distances to enjoy. These destination recreation areas often support local businesses such as guides and outfitters and are some of the primary places that technical outdoor gear is put to use.

Beyond putting recreation values at risk, rescinding the Roadless Rule is problematic from a fiscal standpoint. The USFS already manages more than 368,000 miles of roads,³ more than any other federal land management agency. Deferred maintenance needs for the USFS road system total more than \$5,980,000,000 and comprise by far the largest share of the agency's immense deferred maintenance backlog.⁴ Considering the enormity of this backlog, and the USFS's current work to reduce its overall fiscal footprint, taxpayer dollars would be better spent maintaining existing roads and, where necessary, decommissioning unneeded roads, rather than on further expanding the road system into the most rugged and inaccessible areas of the National Forest System.

³ U.S. Forest Service, *Fiscal Year 2026 Budget Justification*, Page 29a-87 (June 1, 2025), <https://www.fs.usda.gov/sites/default/files/fs-fy26-congressional-budget-justification.pdf>.

⁴ U.S. Forest Service, *National Forest System Statistics, Fiscal Year 2024*, FS-905 (Apr. 2025), https://www.fs.usda.gov/sites/default/files/fs_media/fs_document/FY24-forest-system-stats.pdf.



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USDA has repeatedly cited—with little detail—concerns around wildfire risk as its primary justification for rescinding the Rule.⁵ As a stakeholder that is directly affected by extreme wildfires, the outdoor recreation community supports forest thinning, prescribed fire, community hardening, and other actions needed to address the wildfire crisis.⁶ We are generally sympathetic and open to policy changes that science or other expertise show are needed to increase wildfire resilience on public lands. However, in this instance, we reject the USDA's assertion that a full rescission of the Roadless Rule is necessary for achieving wildfire suppression, community protection, or landscape fire resilience objectives within and around IRAs.

By their very nature, IRAs tend to be remote landscapes, generally far from communities, where wildfires are less likely to threaten life or property. Where fuels treatments and other wildfire mitigation work is needed in IRAs, the Roadless Rule already clearly allows for fuel reduction, including tree removal, necessary to reduce the risk of uncharacteristic wildfires.⁷ Indeed, the bipartisan Wildland Fire Mitigation and Management Commission's comprehensive report on wildfire solutions in 2023 does not mention the Roadless Rule, implying that it was not top-of-mind for Commission experts charged with improving wildfire policy.⁸

Wildfire science also does not identify the Roadless Rule as an impediment to effective wildfire management, and instead science shows significant drawbacks related to roads and fire. Most wildfires start along roads, and thus wildfire ignitions are significantly more common in roaded landscapes than in IRAs or

⁵ See, U.S. Dep't of Agriculture *Supra* note 2, Roadless Rule rescission will allow for "fire prevention and responsible timber production."; See also, U.S. Forest Service, *It's Time for Common-Sense Roadless Reform* (June 20, 2024), <https://www.fs.usda.gov/inside-fs/leadership/its-time-common-sense-roadless-reform>, "For nearly 25 years, this rule has frustrated land managers and served as a barrier to action – prohibiting road construction, which has limited wildfire suppression and timber harvesting on nearly 60 million acres."

⁶ See, Jamie Ervin, *Wildfire and Outdoor Recreation in the West: How Recreationists Can Support a Fire-Resilient Future*, Policy Report, Outdoor Alliance, Washington, D.C. (2023).

⁷ 36 CFR § 294.13(b).

⁸ Wildland Fire Mitigation and Management Commission, *ON FIRE: The Report of the Wildland Fire Mitigation and Management Commission* (2023).



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Wilderness.⁹ Building additional roads in IRAs would increase the likelihood of unwanted ignitions during extreme fire conditions. Science also does not show increased fire severity within roadless areas. Instead studies have found no significant difference between fire severity in roaded versus unroaded landscapes,¹⁰ and have shown high severity fire to be more frequent within and adjacent to industrially-managed timberlands than on public lands.¹¹

To the extent that modifications to the Roadless Rule may be helpful for addressing wildfire management objectives, the outdoor recreation community is open to an honest dialogue about those changes. Such a process must be guided by sound science, land manager expertise, Tribal consultation, and public input. A full national repeal of the Rule should not be the starting point for such discussions. In the absence of such a process, we firmly oppose any effort to rescind or otherwise weaken the Roadless Rule.

* * *

Thank you for considering the outdoor recreation community's perspective on this important issue. We look forward to working with Congress to secure strong science-backed protections for roadless areas in line with the Roadless Area Conservation Act.

Best regards,



Louis Geltman
Vice President for Policy and Government Relations
Outdoor Alliance

⁹ James D. Johnston et al., *Does conserving roadless wildland increase wildfire activity in western US national forests?*, 16 Environmental Research Letters 084040 (2021), <https://doi.org/10.1088/1748-9326/ac13ee>.

¹⁰ *Id.*

¹¹ Jacob I. Levine et al., *Higher Incidence of High-Severity Fire in and Near Industrially Managed Forests*, 20 Frontiers in Ecology & the Environment 397 (2022), <https://doi.org/10.1002/fee.2499>.



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cc: Secretary Brooke Rollins, U.S. Department of Agriculture
Chief Tom Schultz, U.S. Forest Service
Sen. John Boozman, Chair, Committee on Agriculture, Nutrition, and Forestry
Sen. Amy Klobuchar, Ranking Member, Committee on Agriculture, Nutrition, and Forestry
Rep. G.T. Thompson, Chair, Committee on Agriculture
Rep. Angie Craig, Ranking Member, Committee on Agriculture

Adam Cramer, Chief Executive Officer, Outdoor Alliance
Heather Thorne, Executive Director, Access Fund
Beth Spilman, Executive Director, American Canoe Association
Clinton Begley, Executive Director, American Whitewater
Kent McNeill, CEO, International Mountain Bicycling Association
David Page, Executive Director, Winter Wildlands Alliance
Tom Vogl, Chief Executive Officer, The Mountaineers
Ben Gabriel, Executive Director, American Alpine Club
Madeline Bachner Lane, Chief Executive Officer, Colorado Mountain Club
Chad Nelsen, Chief Executive Officer, Surfrider Foundation

