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September 19, 2025

Secretary Brooke Rollins
United States Department of Agriculture
1400 Independence Ave. SW
Washington, DC 20250

RE: FS-2025-0001, Notice of intent to rescind the Forest Service Roadless Area Conservation Rule

Submitted via: <https://www.regulations.gov/commenton/FS-2025-0001-0001>

Secretary Rollins,

On behalf of the human-powered outdoor recreation community, we write to share our community's interest in the U.S. Forest Service's (USFS) 2001 Roadless Area Conservation Rule (hereinafter "Roadless Rule" or "Rule"), the importance of lands and waters protected by the Rule for human-powered outdoor recreation, and the utility of the Rule in protecting recreation values. Roadless areas are deeply valuable to our community, both for their unique recreation values, and for the strong ecological and economic benefits that they provide to society. Ensuring long-term conservation and protection of these areas is a high priority for our community. These comments respond to the U.S. Department of Agriculture's (USDA) Notice of Intent (NOI) to rescind the Rule and suggest areas for further analysis in the Draft Environmental Impact Statement (DEIS).

We strongly oppose the current proposal to rescind the Rule nationally. However, as we describe below, we welcome a dialogue with USDA regarding whether and how the Rule could be improved to address wildfire risk to communities and enhance its efficacy in protecting Roadless values, including outdoor recreation. As USDA develops the DEIS, we ask that the agency work collaboratively with Tribes, scientists, fire managers, and public lands stakeholders including the outdoor recreation community to develop robust, science-based alternatives to a full repeal of the Rule.



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

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. 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. Importantly for our community—as well as for hunters, anglers, and motorized recreationists—the Rule provides strong conservation protections while allowing for a full range of recreational activities consistent with local forest plans.

The NOI proposes rescinding the Roadless Rule nationally, while maintaining the Idaho and Colorado Roadless Rules, which were developed in 2008 and 2012, respectively following petitions from both states. The proposed rescission would affect 44.7 million acres of IRAs, totaling approximately 77% of the total area protected by the Rule, including countless recreation opportunities that members of our community value and enjoy.

From our perspective, the Roadless Rule is working as intended to protect the unique values of IRAs. The NOI fails to consider the benefits that roadless areas provide to society and does not articulate an adequate justification for rescinding the Rule. Our high-level comments include:

- Roadless areas have numerous recreation values that deserve permanent protection;



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- The process pursued through this NOI is rushed and does not allow adequate time for stakeholders to understand the implications of USDA's proposal or provide input;
- A full rescission of the Roadless Rule is not necessary to address wildfire resilience and forest health;
- Expanding the USFS's already-extensive road system is fiscally problematic and should be avoided;
- Pursuing Roadless Area protections through the land management planning process would be inefficient and fails to provide certainty that roadless values will be protected;
- A rescission will uniquely affect the Tongass National Forest, and this forest's outstanding recreation, economic, and climate mitigation values require specific consideration in the DEIS; and
- The DEIS must analyze an adequate range of alternatives and should evaluate whether narrower changes to the Roadless Rule might address wildfire resilience, forest health, and community protection.

Our comments on specific aspects of the NOI are below.

Value of Roadless Areas for Outdoor Recreation

The Roadless Rule protects landscapes that recreationists value while allowing for a wide variety of recreational uses ranging from backpacking to motorized recreation. Recreationists seek these areas out specifically for their scenic, undeveloped character, for their ecological integrity, for opportunities to view wildlife, for opportunities to travel long distances over challenging terrain, and more. These recreation values and resources, which would be put at risk if the Rule is rescinded, require thorough and specific consideration in the DEIS.

IRAs contain a striking number and variety of high-quality outdoor recreation opportunities. According to maps from Outdoor Alliance's GIS Lab, roadless areas affected by the rescission (which does not include Colorado or Idaho) protect more than 25,121 miles of trails including 10,794 miles of mountain biking, 8,659 climbing routes and 768 miles of whitewater (in addition to critically important headwaters). Roadless areas are found in 42 states and Puerto Rico, and they are home to recreation gems like:



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- 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 on 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;
- 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 seek out intentionally. 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. Rescinding the Roadless Rule would put these recreation opportunities at risk by removing an essential nationwide protection for these backcountry areas.

Each of the human-powered recreational pursuits noted above benefits uniquely from roadless area protections. Hikers and backpackers benefit from opportunities to travel through and camp in landscapes less affected by development, noise, and light pollution; skiers benefit from access to less-traveled winter terrain; and climbers benefit from opportunities to pursue more remote climbing objectives far from crowds. Paddlers benefit from the roadless setting, but also from clean water resulting from a lack of sedimentation from roads and other development, as well as a more natural flow regime when rivers originate in landscapes protected by the Rule; in fact, river-based recreationists benefit directly from roadless protections even when paddling at a significant remove from roadless areas, and the DEIS must



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consider impacts to rivers and river-based recreation on segments that currently benefit from roadless protections. For mountain biking, which is not permitted in designated Wilderness, IRAs are often *the best* (and sometimes the only) places to experience high-quality backcountry recreation on National Forests. Regardless of recreational pursuits, all recreationists benefit from these roadless areas' outstanding scenic character and ecological values.

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.

The DEIS must analyze the effects that a loss of roadless protections would have on outdoor recreation on National Forests. This should consider how the rescission might affect the diversity of recreation opportunities and settings across the National Forest System (NFS), the effect on guides, outfitters, and other outdoor businesses that use roadless areas, and how rescinding roadless area protections will affect ecological values, such as clean water and natural flow regimes, that support the recreation experience. Importantly, the DEIS must consider whether a narrower change to the Rule might maintain its protections for recreation values while also addressing any concerns related to forest health, wildfire resilience, and community protection. Any move by USDA to rescind the Rule without adequate consideration of recreation values would be arbitrary and would ignore a key benefit that roadless areas provide to the American public.

USDA's Approach to Rescinding the Roadless Rule

The 21-day public comment period associated with the NOI does not allow for meaningful public involvement and should be extended. Rescinding the Roadless Rule is a consequential decision that would affect 44.7 million acres of National Forest lands containing a wide range of ecological and social settings across the country, including some of America's most high-quality and popular outdoor recreation destinations. Moreover, the NOI itself contains little justification for USDA's decision beyond several brief paragraphs generally citing wildfire and forest



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health concerns, leaving the public with little information to respond substantively to USDA's proposal. Twenty-one days is not enough time for the public to fully understand, much less provide meaningful feedback on, such a consequential decision, especially given such little information. The 2001 Roadless Rule was adopted following extensive public comment, drawing more than 1.6 million comments.¹ USDA should extend the public comment period associated with the NOI to allow for a more meaningful public dialogue before moving forward with a DEIS.

Wildfire in Roadless Areas

The NOI cites several concerns related to wildfire and forest health, particularly within and around the wildland-urban interface (WUI), as justification for rescinding the Rule. As a stakeholder that is directly affected by extreme wildfires, we take this concern seriously. Outdoor recreationists are frequent visitors to fire-prone landscapes, and members of our community often reside in communities subject to high wildfire risk. Outdoor Alliance supports the USFS's work to plan and implement forest thinning, prescribed fire, community hardening, and other actions needed to address the wildfire crisis,² and we are generally sympathetic and open to policy changes that science, Indigenous knowledge, or other expertise show are needed to increase wildfire resilience on public lands.

In this instance, however, the USDA has not shown that a full rescission of the Roadless Rule is necessary—or even helpful—for achieving wildfire suppression, community protection, or landscape fire resilience objectives within and around IRAs, and the NOI fails to mention the well-established connection between roads and unwanted fire ignitions. As is described below, the Rule already allows for a wide range of actions to address wildfire, and to the extent that changes to the Rule would benefit wildfire resilience or fire suppression, these changes could be targeted in a way that maintains the Rule's critical protections for recreation values. In fact, as recently as 2023, the bipartisan Wildland Fire Mitigation and Management Commission—chartered by Congress to identify solutions to the wildfire crisis—did not mention the Roadless Rule in their comprehensive report,

¹ Special Areas; Roadless Area Conservation, 66 Fed. Reg. 3244, 3248 (Jan. 12, 2001).

² 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).



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implying that it was not top-of-mind for Commission experts charged with improving wildfire policy.³

Our perspective is described in more detail below in relation to the different aspects of wildfire resilience referenced in the NOI.

Ignitions

Building additional roads in IRAs will increase the risk of unwanted wildfire ignitions. The vast majority of wildfires are human-caused,⁴ and wildfire science overwhelmingly shows that human-caused fire ignitions are significantly higher in areas with higher road density.⁵ Rescinding the Roadless Rule opens up the possibility that new roads will be proposed in roadless areas, thereby increasing the likelihood of ignitions in these areas. The DEIS must thoroughly analyze the relationship between roads and wildfire ignitions, including consideration of how an increase in human-caused wildfire ignitions within IRAs would affect wildfire management and forest health across the NFS.

Fire Suppression

The Roadless Rule allows for a full range of fire suppression activities, including building roads where “needed to protect public health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property.”⁶ The USFS has extensive experience suppressing wildfires in roadless areas and has had a high success rate under current policy. Roads can, however, be important infrastructure for fire suppression, and often provide important strategic infrastructure for fire crews to

³ Wildland Fire Mitigation and Management Commission, *ON FIRE: The Report of the Wildland Fire Mitigation and Management Commission* (2023).

⁴ James Balch et. al., *Human-started Wildfires Expand the Fire Niche Across the United States*, 114 Proc. Nat’l Acad. Sci. 4,840 (2017), <https://doi.org/10.1073/pnas.1617394114>.

⁵ See, William Downing et. al., *Human Ignitions on Private Lands Drive USFS Cross-Boundary Wildfire Transmission and Community Impacts in the Western US*, 12 Sci. Rep. 2624 (2022), <https://doi.org/10.1038/s41598-022-06002-3>; See also, Adrián Jiménez-Ruano et. al., *Spatial Predictions of Human and Natural-Caused Wildfire Likelihood across Montana (USA)*, 13 Forests 1200 (2022), <https://doi.org/10.3390/f13081200>.

⁶ 36 C.F.R. Part 294.12(b)(1).



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stage equipment, establish holding lines, and conduct backburning operations to remove fuels ahead of a wildfire. With this context, the DEIS should analyze whether installing some additional fire suppression infrastructure—such as non-public roads or fire lines—within and adjacent to the WUI might aid wildfire response *before* a wildfire poses an imminent threat to life or property. Such infrastructure should be limited to strategic locations, such as ridgelines, where strategic wildfire planning or Indigenous knowledge indicate that geographic conditions would aid fire suppression in the inevitable event of a future wildfire. This work could tie to the USFS fire managers’ existing work to identify Potential Operational Delineations (PODs) to plan appropriate locations for managing wildfires for resource objectives when conditions allow.

Fuels Management and Fire Severity

The NOI states that “[t]he occurrence of moderate- to high-severity fire in inventoried roadless areas has increased in recent decades, especially since 2000, consistent with trends throughout the National Forest System.”⁷ Both within and outside of IRAs, frequent-fire forests across the NFS have become more susceptible to high-severity fire outside of the natural range of variation due to multiple factors including widespread fire suppression, removal of Indigenous stewardship, and the homogenization of dry forest ecosystems following aggressive logging and reforestation.⁸ Science is clear that increasing the pace and scale of fuels treatments including targeted removal of small-to-medium diameter trees, prescribed fire, and managed wildfire is critically needed to reduce fuels in dry forests to a level more reminiscent of historical conditions in order to mitigate the risk of uncharacteristic high severity wildfire in a warmer, dryer climate.⁹ The outdoor recreation community strongly supports this work, including in IRAs where ecologically appropriate and thoughtfully designed.

⁷ Special Areas; Roadless Area Conservation; National Forest System Lands, 90 Fed. Reg. 42180 (August 29, 2025).

⁸ Keala Hagmann et. al., *Evidence for Widespread Changes in the Structure, Composition, and Fire Regimes of Western North American Forests*, 31 Ecol. Appl. e02431 (2021), <https://doi.org/10.1002/eap.2431>.

⁹ Paul Hessburg et. al., *Wildfire and Climate Change Adaptation of Western North American Forests: A Case for Intentional Management*, 31 Ecol. Appl. 54 (2021), <https://doi.org/10.1002/eap.2432>.



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The NOI's acknowledgement that the increase in high severity fire within IRAs is consistent with trends across the NFS reflects sound science and indicates that roadless area protections are not driving the increase in high severity fire across the NFS. Indeed, studies have found no significant difference between fire severity in roaded versus unroaded landscapes¹⁰ and have shown high severity fire to be more frequent within and adjacent to industrially-managed timberlands than on public lands.¹¹ Given that there is no significant difference in fire severity within and outside of roadless areas, it is unclear how rescinding the Rule is expected to advance the USFS's goal of decreasing the amount of uncharacteristic high severity fire occurring across the NFS, and moving forward based on this rationale would be arbitrary and capricious.

The Roadless Rule also already clearly allows for fuels treatments, including the removal of generally small diameter timber, both to improve wildlife habitat and to "reduce the risk of uncharacteristic wildfire effects, within the range of variability that would be expected to occur under natural disturbance regimes of the current climatic period."¹² The USFS has successfully used this authority on numerous occasions to complete fuel treatments within IRAs. According to an analysis by Trout Unlimited, hazardous fuels treatments have been completed on nearly two million acres of National Forest roadless lands, comprising approximately 14% of all Forest Service hazardous fuels treatments in the western U.S.¹³

Wildland-urban interface (WUI)

By their very nature, IRAs tend to be remote landscapes, generally far from communities, where wildfires are less likely to threaten life or property. As more people have moved to fire-prone areas in recent decades, the WUI has expanded,

¹⁰ 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>.

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>; Harold Zald & Christopher Dunn, *Severe Fire Weather and Intensive Forest Management Increase Fire Severity in a Multi-Ownership Landscape*, 28 Ecol. Appl. 1068 (2018), <https://doi.org/10.1002/eap.1710>.

¹² 36 C.F.R. § 294.13(b)(1)(ii).

¹³ Trout Unlimited, *Roadless Areas by the Numbers (StoryMap)*, ArcGIS StoryMaps, <https://storymaps.arcgis.com/stories/4d9978ecdfb246e4a53b8a5681b631cb> (accessed Sept. 16, 2025).



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and there are some locations within the NFS where portions of IRAs border developed infrastructure. The extent of this overlap should be clarified based on a clear, scientifically-sound definition of the WUI.

The NOI states that 10.2 million acres of IRAs are within the WUI, and that an additional 4.8 million acres are within one mile of the WUI using the definition of the WUI established by the Healthy Forests Restoration Act (HFRA) at 16 § U.S.C. 6511(16).¹⁴ However, we are unaware of any geospatial layer identifying the WUI as defined by HFRA, and we are concerned that the HFRA analysis cited in the NOI applies an overly-broad interpretation of the WUI that lacks scientific underpinning and fails to reflect conditions on the ground. The DEIS's analysis of the relation between IRAs and community wildfire risk—especially regarding a rescission or change to the Roadless Rule—must be grounded in a clear, publicly-available, and scientifically sound map of the WUI.

We propose identifying the WUI using the authoritative map and associated data layer created by the USFS titled “Wildland Urban Interface: 2020,”¹⁵ which was created using methods identified in peer-reviewed research by researchers at the University of Wisconsin and the Forest Service Northern Research Station.¹⁶ This publicly available layer is both scientifically sound and spatially explicit and will aid the public in understanding the connection between the Roadless Rule and wildfire risk to communities. The USFS layer shows that approximately 2.8 million acres of IRAs are located within or within one mile of the WUI—a dramatically smaller area of overlap than the NOI's estimate. This distinction is extremely important, as both

¹⁴ 90 F.R. 42180.

¹⁵ See, Wildland-Urban Interface: 2020 (Map Service), U.S. Forest Service, <https://data-usfs.hub.arcgis.com/documents/usfs::wildland-urban-interface-2020-map-service/about?path=> (Visited Sept. 18, 2025); This layer was created based on the Forest Service's definition of the WUI found at 66 F.R. 751-777.

¹⁶ See, Volker Radeloff et. al., *The 1990-2020 wildland-urban interface of the conterminous United States - geospatial data, 4th Edition*, Forest Service Research Data Archive, Fort Collins, CO (2023), <https://doi.org/10.2737/RDS-2015-0012-4> 2023; See also, Volker Radeloff et. al., *Rapid Growth of the U.S. Wildland-Urban Interface Raises Wildfire Risk*, 115 Proc. Nat'l Acad. Sci. 3314 (2018), <https://doi.org/10.1073/pnas.1718850115>.



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the NOI and recent statements from the USFS Chief Tom Schultz both identify wildfire threats within the WUI as a primary justification for rescinding the Rule.¹⁷

USFS Road System

We are concerned that the USFS is considering expanding its road system when it lacks the resources needed to care for the roads currently on USFS lands. Outdoor recreationists experience the effects of a deteriorating road system through closures, hazardous road conditions, sedimentation in waterways, and more. Roads are critical for accessing outdoor recreation opportunities on National Forests, and our community has long advocated for programs like the Legacy Roads & Trails Program and the National Parks and Public Lands Legacy Restoration fund that have directed billions of dollars towards critical road maintenance and rehabilitation projects on National Forests; however, roads also come at a cost to conservation values and the recreation experience, and the USFS must be strategic in the maintenance, decommissioning, and, where needed, development of roads and do so in a manner cognizant of fiscal constraints.

The USFS already manages more than 380,000 miles of roads,¹⁸ 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.¹⁹ 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 NFS. The DEIS should include a thorough cost/benefit analysis of the USFS's current road maintenance needs, including the costs that constructing and maintaining new roads in IRAs might pose for taxpayers.

¹⁷ Marc Heller, *Rationale for More Logging in Roadless Areas Comes into Question*, E&E News, Greenwire, (Aug. 21, 2025), <https://subscriber.politicopro.com/article/eenews/2025/08/21/rationale-for-more-logging-in-roadless-areas-comes-into-question-00517454>.

¹⁸ U.S. Forest Serv., *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>.

¹⁹ 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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Local Versus National Protections for Roadless Areas

The NOI proposes removing national-level protections for IRAs and instead using “local land management planning processes to administer inventoried roadless areas.”²⁰ This approach to roadless area conservation is inefficient and fails to provide assurance that the outstanding recreation values in IRAs will be sustained.

Outdoor Alliance and our member organizations are deeply familiar with the forest plan revision process. Members of our community have extensive experience working with the USFS, Tribes, and stakeholders to ensure that forest plans accurately reflect recreation values on a particular forest, and we consider forest plan revisions to be an appropriate venue for addressing a wide range of place-based recreation issues on individual forests, as outlined in the 2012 Planning Rule. Forest plan revisions take multiple years, in some cases lasting more than a decade, and require a significant investment of time and resources from stakeholders. Although forest plans are intended to guide National Forest management for a period of 15 years, it is not unusual for individual plans to remain in place for more than double that amount of time because forests lack the resources necessary to complete regular forest plan revisions in a timely manner.

Addressing roadless area management through individual forest plans will add even more complexity to the forest plan revision process, making plan revisions slower, more contentious, more difficult for local forests to navigate, and more subject to litigation. Contrary to the agency’s claim that the national rule “adds administrative burden and does not efficiently support multiple use management,”²¹ the piecemeal approach to IRA management proposed in the NOI is certain to increase the amount of work required to revise or amend forest plans, without providing assurance to the public that the multiple use values found within roadless areas are sustained. The Roadless Rule serves as an important national overlay on forest plans, the presence of which simplifies the scope of issues that need to be evaluated through individual plan revisions.

²⁰ 90 F.R. 42181.

²¹ *Id.*



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The loss of the national Roadless Rule will also directly and foreseeably lead to significant cumulative ecological effects that extend beyond the boundaries of individual forests. Currently, the Rule provides a consistent nationwide protection for high-quality wildlife habitat and ecological services like water quality and carbon storage. If the national Rule is rescinded, individual forests may propose projects that collectively cause habitat fragmentation and other significant environmental impacts at the landscape or regional scale. The DEIS must analyze these cumulative effects, particularly in relation to habitat connectivity for sensitive species, as well as for downstream water quality.

Tongass National Forest

A loss of roadless area protections would uniquely harm Alaska's Tongass National Forest, which contains 9.37 million acres IRAs—far more than any other National Forest. The outdoor recreation community has consistently opposed removing Roadless protections from the Tongass due to its high recreation value, its importance for local economies, and its important ecological function and role as a carbon sink.

The Roadless Rule is crucial to protecting the opportunities and experiences that define the quality of life for residents of Southeast Alaska and attract visitors to the Tongass from across Alaska and around the globe. Roadless areas on the Tongass are treasured for remote and adventurous recreation opportunities like the world-renowned mountaineering routes on the Mendenhall Towers and the Direct East Ridge of Devil's Thumb, one of the 50 classic climbs of North America. Meanwhile, the East Glacier Trail and Fritz Cove Road sport climbing crag, both near Juneau, provide relatively close-to-home outdoor recreation for many people. Additionally, ocean areas adjacent to, and in many cases surrounding, Tongass National Forest roadless areas offer world-class sea kayaking and coastal recreation opportunities, with viewsheds, camping, water quality, and wildlife all protected through the Roadless Rule.

In addition to the intrinsic and experiential values of roadless areas, the values protected by the Roadless Rule support the quality of life and economic vitality of nearby communities. Roadless lands are integral to the outdoor recreation economy in Alaska, where outdoor recreation directly employs more than 21,000



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people and comprises 4.6% of statewide GDP.²² Rescinding the Roadless Rule would harm southeast Alaska’s recreation economy. If the Tongass’s old growth forests were to be logged, the recreational value, and the reason many visitors come to Southeast Alaska, would be diminished or lost. People do not travel to southeast Alaska to kayak against a backdrop of clearcuts or hike up logging roads. They visit for outdoor recreation in superlative settings where they have the opportunity to view wildlife that is rare or not found elsewhere in the world. Intact ecosystems are core to the Alaskan experience.

Old growth forests on the Tongass are also critical for climate stability, and protecting the Tongass’s old growth is of profound importance to all Americans, both within Alaska and beyond. The Tongass currently stores more carbon than any other forest in the United States, much of which is stored in the old growth forests within IRAs. Elimination of Roadless Rule protections will turn the Tongass from a globally significant carbon sink into a carbon source. This alone should be reason to maintain Roadless protections.

Considering the important role that the Roadless Rule plays in protecting these outdoor recreation and economic values, as well as carbon storage on the Tongass National Forest, the DEIS must analyze how rescinding the Rule will affect this forest specifically.

Additional Wildfire Resilience and Community Protection Alternative

In its brief discussion of DEIS alternatives, the NOI only identifies the proposed action—a full rescission of the Roadless Rule outside of CO and ID—and a “no-action” alternative that would leave the Rule in place. This binary analysis fails to meet NEPA’s requirement that an EIS analyze alternatives to the proposed action and misses an opportunity to consider whether narrower changes to the Rule might improve wildfire resilience, forest health, and community protection, while sustaining the other multiple-use values, including outdoor recreation, that the Rule currently protects.

²² U.S. Bureau of Economic Analysis, BEA 24-53, Outdoor Recreation Satellite Account, U.S. and States, 2023 (2024).



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We request that the DEIS include additional alternatives that would leave the national Rule in place while making targeted changes to enhance wildfire resilience and forest health in IRAs, particularly within and immediately surrounding the WUI. Elements of such an alternative could include:

- Allowing for temporary roads for fire management purposes within the WUI;
- Updating the timber harvest language at 36 C.F.R. § 294.13 to allow harvest to occur for the purpose of protecting life and property within the WUI;
- Removing the qualifier that tree cutting is expected to be infrequent for areas within the WUI; and
- Analyzing whether certain topographical features, such as ridgelines, within IRAs could be enhanced to aid fire suppression without adding new public roads to the NFS.

The integrity of such an alternative hinges on an accurate, publicly-supported definition of the WUI. As noted above, USDA should delineate the WUI using the USFS's Wildland-Urban Interface: 2020 analysis, which was developed using scientifically sound and publicly available methodology.²³ This layer identifies approximately 2.8 million acres of IRAs within or within one mile of the WUI. Furthermore, all alternatives should clarify that actions taken within IRAs must be in compliance with a local forest plan.

* * *

Thank you for considering our community's input. The Roadless Rule guides National Forest management in a way that protects backcountry recreation opportunities that recreationists of all backgrounds value and enjoy. Rushing to rescind the Rule without fully considering these areas' recreation values risks irreversibly changing the backcountry character that draws millions of Americans to National Forests each year. A rescission is also certain to increase controversy related to National Forest management and would add unnecessary complexity to the forest plan revision process.

²³ Wildland-Urban Interface: 2020 (Map Service), *supra* note 15.



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We are confident that targeted changes to the Rule would better address wildfire resilience and other resource values, including outdoor recreation, while better reflecting the agency's fiscal constraints as they apply to both capacity for site-specific planning initiatives and management of the agency's road network. This approach will require time and will require USDA to take seriously the concerns of public lands stakeholders who value different aspects of the current Rule. If USDA decides to take this path, we offer our support and collaboration in envisioning the future of roadless area conservation and management. Absent such a process, we remain firmly opposed to rescinding the Rule.

Best regards,



Louis Geltman
Vice President for Policy and Government Relations
Outdoor Alliance

cc: Jamie Ervin, Senior Policy Manager, Outdoor Alliance
Adam Cramer, Chief Executive Officer, Outdoor Alliance
Heather Thorne, Executive Director, Access Fund
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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
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