



September 19, 2025
Secretary Brooke Rollins
United States Department of Agriculture
1400 Independence Ave SW
Washington, DC 20250

Re: Docket (FS-2025-0001) Environmental Impact Statements; Availability, etc.: Special Areas; Roadless Area Conservation; National Forest System Lands
Comments submitted electronically through [regulations.gov](https://www.regulations.gov)

Dear Secretary Rollins,

On behalf of The Mountaineers, thank you for the opportunity to submit comments on the U.S. Department of Agriculture's (USDA) Notice of Intent to rescind the 2001 Roadless Area Conservation Rule (Roadless Rule). Our community is deeply invested in the management of National Forest System lands in Washington state and other public lands throughout the Pacific Northwest.

The following comments underscore the importance of a national Roadless Rule to The Mountaineers community with respect to outdoor recreation and conservation. The Mountaineers strongly supports Roadless protections for backcountry areas of the National Forest System. A full rescission of the Roadless Rule represents a significant step backwards – one that would leave 45 million acres of the national forest lands vulnerable to logging, road construction and development.

Increased development would likely bring additional threats from catastrophic wildfire and exacerbate other intensifying impacts from climate change – which are acutely felt by local forest communities. Instead of pursuing a full rescission of the Rule, we ask that the agency keep a national rule in place and study a third alternative that includes adjustments that fine tune the Rule's implementation in the Wildland Urban Interface.

Importance of the Roadless Rule to The Mountaineers

The Mountaineers, based in Seattle, Washington and founded in 1906, is a nonprofit outdoor education, conservation, and recreation organization whose mission is “to enrich the community by helping people explore, conserve, learn about and enjoy the lands and waters of the Pacific Northwest and beyond.” The Mountaineers Books publishing division expands the mission internationally through award-winning publications including instructional guides, adventure narratives, and conservation photography.

More than 1,200 Mountaineers volunteers lead 3,200 outdoor education trips and courses annually for our 17,000+ members. Our youth programs provide over 15,000 opportunities each year for children to get outside. We are a passionate, engaged, and knowledgeable community that cares about the outdoors, and protects the outdoor experience for current and future generations.

Our community's firsthand experience of the positive benefits of time outdoors in backcountry forest areas is invaluable to fostering connection to the natural world and cultivating outdoor enthusiasts as stewards. Healthy and

intact ecosystems are the foundation for our outdoor education programs and books, and therefore our organization's existence and economic contributions.

Roadless Areas are among the most valuable landscapes in the National Forest System. Since 2001, the [Roadless Rule](#) has protected old-growth forests, natural and cultural resources, fish and wildlife habitat, and backcountry recreation opportunities. The Roadless Rule is extremely popular with, and important to, the outdoor recreation community, as Roadless Areas support 11,337 climbing routes and boulder problems, more than 1,000 whitewater paddling runs, 43,826 miles of trail, and 20,298 mountain biking trails across the country.

In Washington state alone, nearly 2 million acres of Roadless Areas foster connection to nature through human-powered outdoor experiences in the backcountry and among old-growth forests through activities such as hiking, climbing, scrambling, backcountry skiing and snowshoeing. Roadless Areas also contribute to the outdoor recreation economy, which supports \$26.5 billion in economic activity and 264,000 jobs in Washington state alone.

Roadless Areas provide high-quality settings for Mountaineers programs and other recreational opportunities across Washington's six national forests – places like Mount Baker, Lake Quinalt, and Washington Pass. Other popular destinations within Washington Roadless Areas include the Maple Pass Loop Trail in the Okanogan-Wenatchee National Forest and Mount Townsend in the Olympic National Forest. These backcountry forest areas connect both youth and adults to nature, to each other, and help foster a conservation ethic amongst the human-powered recreation community.

Roadless Areas are especially important for Mountaineers programs that rely on the unique qualities of unroaded backcountry forests. Nearly all Mountaineers activities depend on Roadless Areas and other protected landscapes to provide the experiences that our members seek: refuge from the developed human experience, solitude, and undeveloped characteristics. For example, activities like backpacking and conditioning hiking require large expanses of unroaded areas to provide an experience that is uninterrupted by development. Examples of places in Roadless Areas in Washington that provide that experience are the Teanaway, areas around Washington Pass, and Baker Lake. Activities like canyoning require free-flowing, undeveloped streams that are not clogged with sediment from a nearby road, mine, or logging operation. Examples of canyons that would be negatively impacted by the rescission of the Roadless Rule include Dark, Prairie, Quicksilver, Incognito, and Mineral Creek. Repealing the Roadless Rule would degrade the remote recreational experience that our members seek, which in turn would affect our organization's ability to accommodate increasing demand for backcountry recreation.

Other Important Values Provided by the Roadless Rule

In addition to recreational values, The Mountaineers also appreciates the following additional values provided by the Roadless Rule:

- Climate Mitigation: Intact Roadless Areas are also critical to climate mitigation efforts – especially those with significant stands of mature and old-growth trees. These forests absorb and store carbon, which mitigates the impacts of climate change.
- Indigenous Cultural Values: Roadless Areas support the cultural lifeways and treaty rights of Tribal Nations and communities. These include food security for many Indigenous communities as well as for sustaining cultural practices, including hunting, fishing, and gathering forest plants for food, medicine, and traditional arts. Rescinding the national Roadless Rule would leave these areas vulnerable to development and affect Tribal communities' ability to carry out their cultural practices.
- Wildlife Habitat: Because of their intact nature, Roadless Areas provide habitat for many species such as elk, mule deer, black bear, wolverines, and native salmon and trout. These species depend on the migration corridors and undeveloped lands protected under the Roadless Rule.
- Clean Drinking Water: The Roadless Rule is vital for providing clean drinking water for communities across the country, including in Washington state. Roads are a major cause of water pollution. Protected upper watersheds help maintain a clean and robust municipal water supply for many communities.

Additional Concerns with Repealing the Roadless Rule

Rescinding Roadless Area protections would undermine all of the benefits listed above as well as endanger communities and put a financial burden on taxpayers.

- Wildfire: A full rescission of the Roadless Rule would make Roadless areas more vulnerable to fire starts, as most wildfires in the U.S. are human-caused – and the ignitions of these fires are strongly associated with roads. As wildfires increase in frequency and intensity across the West – including in areas like Western Washington that historically experience a wetter climate and less wildfire risk – we must consider how to leverage our intact forests as natural climate solutions instead of increasing their risk of wildland fire.
- Fiscal Responsibility: Constructing new roads in undeveloped landscapes is fiscally irresponsible. Especially in the steep, forested landscapes of Washington state, road building is extremely expensive and degrades ecological and recreational values. The Forest Service should prioritize maintaining the existing road network rather than opening Roadless Areas to new road development.

Importance of Public Engagement and Environmental Analysis

The Mountaineers strongly encourages USDA and the Forest Service to conduct this rescission process in a manner fully consistent with the requirements of the National Environmental Policy Act (NEPA) and other major rule-making procedures. For a rule change affecting over 45 million acres, the Draft Environmental Impact Statement (DEIS) should be developed through a robust scoping process that identifies a full range of reasonable alternatives. Each alternative presented should be informed by science and evaluated for its economic, social, and environmental impacts.

A transparent and inclusive process also requires extensive public engagement beyond the opportunity to provide written comments. Our community expects the opportunity to participate in public meetings, including local community meetings in Washington state. This robust, inclusive approach for both education and gathering feedback will be essential to ensuring that stakeholder perspectives are meaningfully incorporated into the Final Environmental Impact Statement (FEIS). The Forest Service has a long tradition of such outreach in large-scale planning efforts, and we urge the agency to honor those practices.

Studying a Third Alternative

The 2001 Roadless Rule strikes an appropriate balance between conservation, recreation, and fire risk mitigation. Rather than jumping directly to a sweeping repeal, the agency should do a thorough analysis of targeted changes to hone the balance among those priorities.

We request that the Forest Service analyze a third alternative focused on strategic technical adjustments to the Roadless Rule focused on specific, targeted changes to advance forest health and fire management in Roadless Areas within and immediately surrounding the Wildland Urban Interface (WUI). A more delicate approach to refining and strengthening the Roadless Rule would center the values of conservation, recreation, and climate, while working towards solutions for challenges facing the WUI.

We are confident that more targeted changes to the Rule would better address wildfire resilience and other resource values, including outdoor recreation. This approach will require extensive input from states, communities, Tribes, scientists, fire managers, and public lands stakeholders. 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.

Thank you for considering our comments. Please let me know if The Mountaineers can provide additional on-the-ground insight from our community's extensive experiences in Washington state's Roadless Areas to help inform future adjustments to the Roadless Rule.

Sincerely,

A handwritten signature in black ink, appearing to read "Betsy Robblee", with a stylized, flowing script.

Betsy Robblee
Conservation & Advocacy Director
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