



September 21, 2026

Secretary Brook Rollins
United States Department of Agriculture
201 14th Street SW
Washington, DC 20250

RE: Comments on the DEIS regarding the repeal of the 2001 National Forest Roadless Area Conservation Rule (Docket # FS-2025-0001-223869)

Dear Secretary Rollins:

The undersigned **XX** conservation, recreation, and wildlife organizations, along with elected officials and local businesses that serve or represent Washington citizens, are writing to express our opposition to the repeal of the 2001 National Forest Roadless Area Conservation Rule.

This proposed rollback of the 2001 Roadless Rule jeopardizes nearly 45 million acres of undeveloped backcountry forestland managed by the U.S. Forest Service. The 2001 Roadless Rule provides protections for around a third of our national forest system. These forests have only remained intact because of the Forest Service's nearly 25-year-old commitment not to build roads in these areas for harmful activities like major logging operations or oil-and-gas drilling.

The US National Forests are the headwaters of our great rivers and the largest **source of municipal water supply** in the nation, serving over 60 million people in 3,400 communities in 33 states. Roads are a major cause of water pollution. Because it protects these headwaters, the 2001 Roadless Rule is vital for maintaining clean drinking water for communities across the country. In Washington State, several cities and towns rely on water quality partially provided by existing inventoried roadless areas in the headwaters of their drinking water supply including the cities of Port Townsend, Sequim, Everett and more than 670,000 residents in towns in southern Snohomish County.

Roadless areas also provide important **protections for our remaining old-growth forests**. Much of the permanently protected Wilderness areas statewide which were designated in the 60's, 70's and 80's protected mostly alpine areas above 3,000 ft elevation. Lower elevation forests where old-growth forests thrive are underrepresented in legislatively protected Wilderness areas. Most of our remaining old growth forests on national forest lands are in roadless areas and the 2001 Rule is the main protection for these ancient forests. Repealing the rule would put these incredible landscapes at risk.

Roadless areas include lower-elevation forests, wetlands, canyons and other undeveloped lands that are critical to our nation's ecological health. Because they are not fragmented by roads, these Roadless Areas provide **habitat for imperiled species** such as California condors, grizzly bears and wolves in the Yellowstone area, native salmon and trout in the Pacific Northwest, migratory songbirds in the Appalachian hardwoods and more. They also sustain wild salmon, especially in Alaska where they are the lifeblood for both the fishing industry and traditional subsistence practices of Indigenous communities. In Washington, 25 at-risk species, including bald eagles, spotted owls, marbled murrelets, steelhead and bull trout, and Chinook salmon are found in National Forests and could be harmed by the building of new roads and the ensuing destruction of Roadless areas.

These protected roadless areas have offered abundant **outdoor recreation opportunities** such as hunting, fishing, camping or other activities. Every year, millions of people take advantage of free (or extremely affordable) access to these public lands. Nationally, Roadless areas protect 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.

Here in Washington State, nearly 2 million acres of these roadless forests are at stake. The proposed repeal threatens access to 830 national forest trails totaling more than 4,000 miles; beloved trails like Lena Lake on the Olympic Peninsula, Kettle Crest in eastern Washington, and Maple Pass Loop in the North Cascades and Juniper Ridge in southwest Washington could face irreversible damage if protections are lifted.

Roadless areas are places where **hunters and anglers can still pursue their passions** and support local economies. Cradling some of the most productive fish and wildlife habitat in the country, these unfragmented national forest lands continue to offer solitude, self-reliance, and opportunities that define our outdoor heritage. Research conducted by the U.S. Forest Service shows that roadless areas are nearly twice as likely to have properly functioning watersheds compared to roaded areas. Roads introduce sediment and invasive species, alter hydrologic

flows, fragment habitat, and create barriers to fish migration, directly impairing the cold, clean water that native salmonids require. Evidence shows a strong correlation between the absence of roads and healthy fish populations, with approximately 70% of all roadless areas supporting native trout and salmon.

Roads also fragment habitat and degrade migration corridors that game species like elk and mule deer rely on. Protected roadless areas help ensure these migratory game corridors remain intact and protected from roads and the industrial development roads enable.

Increased industrial activity in roadless areas would also **threaten Tribal treaty rights and lifeways**, including culturally important sites and subsistence use areas. These spaces are critical to 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. Several Tribes and indigenous organizations weighed in strongly in opposition to the repeal of the Roadless Rule last year for these reasons.

Although proponents of rolling back the Roadless Rule have primarily argued that the repeal is necessary to suppress wildfires, **the science is clear that more roads in these forests will lead to more fires not less.** [Research](#) from The Wilderness Society, now in peer review, shows that from 1992-2024, wildfires were four times as likely to start in areas with roads than in roadless forest tracts. Another [study](#) showed that more than 90 percent of all wildfires nationwide occurred within half a mile of a road. The Firefighters United for Safety, Ethics and Ecology (FUSEE) sent a letter to Congress signed by 120 current and former wildland firefighters that said (in part), “Ending the Roadless Rule and building more roads into roadless areas will not make firefighters safer. New roads will create more human-caused wildfire ignitions in remote steep terrain, increasing firefighter exposure to hazardous suppression efforts with low probabilities of success. This will also pull scarce resources away from the priority of protecting communities.”

Additionally, the 2001 **Roadless Rule permits forest health activities** such as prescribed burning and fuel reduction — it only bars new road construction and industrial logging. [According to the Forest Service’s own research](#), 34% of all fuel treatment activities between 2001–2019 occurred in roadless areas.

After an extensive two-year public process, including more than 400 public meetings nationwide (and 28 throughout Washington State) as well as 1.6 million public comments (95% of which were in support of the Rule) the rule was finalized in January of 2001. The Roadless Rule has a large base of support in Washington State. Over 900 Tribes and Washington stakeholders including elected officials, conservation groups, recreation organizations, hunting & fishing groups, and local businesses have shown their support for roadless areas.

The existing roadless rule is a balanced policy which includes common sense for temporary or other actions relating to road building for wildfire response, public health and safety, cleaning up toxic waste, existing mineral leases, federal highway projects, ecosystem restoration and habitat protection.

Roadless protections are one of the last, best tools we have to protect our remaining old-growth forests, salmon streams, clean drinking water, and backcountry recreational areas. **We urge you to choose the No Action Alternative as part of the Draft Environmental Impact Statement and not repeal or weaken the 2001 Roadless Rule.**

Sincerely,

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