

5 October 2026

Dear Acting Director White,

We, the undersigned public lands advocates and scientists, on behalf of our members, supporters, and ourselves oppose the rescission of the 2001 Roadless Area Conservation Rule. However, we also reject the premise that the only choices on the table are rescission, mostly-rescission, or maintaining the rule as is. The Draft Environmental Impact Statement (DEIS) for the Roadless Rule rescission proposal claims (p. 10) that there is a need for more “active management”, in the form of road building and logging, ostensibly to better address “increasing wildfire risk”, “forest health”, and “community protection”. Yet the failure of the USDA to consider an alternative which would meet these stated objectives through greater, not lesser, protections for Roadless Areas ultimately renders the DEIS illegal under the National Environmental Policy Act and the Administrative Procedures Act. For the reasons articulated below, the DEIS in its current form should be withdrawn.

The Draft EIS Concedes that the Action Alternatives Fail to Meet the Agency’s Claimed Goals

Throughout the DEIS, the USDA repeatedly invokes the need to reduce wildfire risk and improve forest health as the central reasons for the proposed rescission of the Roadless Rule, and yet their own analysis shows that less protection, and more roads and logging, as envisioned by Alternatives 2 (Rescission of the Roadless Rule) and 3 (Rescission of the Roadless Rule in most Roadless Areas), is likely to undermine these stated goals. The DEIS admits (p. 22) that “impacts from road construction and timber harvest activities” include “increased fire frequency (human-caused)”. The DEIS (p. 24) further admits that “the number, frequency, and density of wildfire ignitions are lower in designated wilderness and potentially affected IRAs [Roadless Areas] compared to other NFS lands”, and that building roads into Roadless Areas will likely “increase the number and frequency of wildfires as human-ignitions are more likely near roads.” It also admits (p. 24) that road building and logging would “increase the extent” of “invasive plant species”, which are highly combustible. Nowhere does the DEIS analyze or disclose the increased threat to communities that would result from the intensified and expanded wildfire activity that would result from the road-building/logging action alternatives.

The DEIS (p. 24) then states that “public access could be limited to minimize fire hazard”, which would be caused and increased by the road building and logging that would occur under the action alternatives, in certain “high-risk areas”. In other words, the DEIS proposes to close an undisclosed acreage—potentially millions of acres—to hikers, equestrians, hunters, mountain bikers, and cars or trucks as a way to partially mitigate the increased wildfire activity and spread the Forest Service’s proposal would cause, by the agency’s own admission. Nowhere does the DEIS divulge the specific or estimated extent of this serious and potentially landscape-scale exclusion of the public from public lands.

The DEIS (p. 22) also admits that the road building and logging that would occur under the action alternatives would cause degradation of forest health, including, “sedimentation and impacts to water quality”, “landscape fragmentation”, and “adverse impacts to threatened, endangered, or sensitive wildlife and plants”. There would also be an increase in mining and development of forests for fossil fuel extraction under the existing action alternatives (DEIS, p. 23). The DEIS (p. 24) further elaborates on the degradation of forest health that would be caused by the road building and logging envisioned by the action alternatives, including “loss of vegetation”, “soil erosion and compaction”, “loss of soil productivity”, “increased water runoff” (i.e., increased flooding), and “reduced water quality”, as well as “reduced air quality”. In a shocking admission, the DEIS (p. 25) states that the road building and logging that would occur under the action alternatives “is likely to adversely affect” a total of “327 ESA-listed species and 71 critical habitats”.

Notably, the DEIS (p. 22) states that the road-building/logging action alternatives would cause “economic losses related to recreation” but would benefit economic interests “that value timber harvest and potential mineral and energy development” (DEIS, p. 26). The DEIS (p. 26) also admits that these action alternatives would cause “adverse affects” to the “spiritual” and “religious” interests of Tribes, including “cultural practices and ceremonies”, as well as adversely impacting the “plant and animal life” important to Tribes.

Mixed Intensity Wildfire is Beneficial to Forest Ecosystems

Mixed-intensity fire is a natural and necessary process in these forests. It is not a hazard to be corrected. The Forest Service’s rationale treats fire itself as the failure state. That premise is false, and no amount of extraction framed as a response to it will make it true. Roadless Areas should be a place where natural processes like lightning fires can occur without interference, for the benefit of biodiversity, instead of wildfire activity that is artificially increased by human exploitation, as would occur under Alternatives 2 and 3.

Unlogged, unmanaged Roadless and wilderness areas function as an experimental control for our public lands. They show how these forests respond to fire, insects, and other natural disturbance without human intervention. Without unlogged acres to compare against, logging can no longer be tested against what the forest does on its own, and the agency’s premises about mechanical intervention go unexamined by the data that would otherwise test them.

Grazing Increases Fire Risk

The DEIS never examines one of the best-documented drivers of wildfire risk to communities and human infrastructure in dry forests: livestock grazing. Cattle grazing is currently permitted across over ten million acres of Inventoried Roadless Areas. Cattle selectively graze palatable native perennial bunchgrasses and trample the biological soil crusts that stabilize soils and resist invasion, leaving openings for invasive annual grasses such as cheatgrass to establish themselves. Those annuals cure early, stay dry through the fire season, and form continuous fine fuels, while live bunchgrasses are further spaced, keep moisture and burn less readily. The DEIS acknowledges this without actually analysing it. It names livestock as an ongoing

invasive-plant vector (p. 107) and claims that "... grazing [has] disrupted natural fire cycles" across the National Forest System (p. 215). Yet grazing appears only in a list of activities allowed under every alternative (p. 21). The DEIS's stated purpose and need for reducing wildfire risk ignores an ongoing, permitted activity that it admits is part of the problem it allegedly seeks to address.

Failure to analyze this issue matters more because rescission of the Roadless Rule could expand grazing's footprint. New and reconstructed roads, the central foreseeable consequence of Alternatives 2 and 3, would make it easier to truck livestock, haul supplements, construct new fences, and build water developments in areas that are now ungrazed or lightly grazed because of limited access. Cattle concentrated in new places would then bring the same soil disturbance, crust damage, and invasive spread into IRAs that currently have invasives on less than one percent of their area (DEIS, p. 24). Under NEPA, that is a reasonably foreseeable indirect effect of the road building the DEIS acknowledges, and leaving it out understates community fire and invasive-species proliferation risks. Neither addresses the well-documented grazing–invasive–annual–fire feedback, which the DEIS never addresses.

Failure to Consider a Reasonable Range of Alternatives

In light of the foregoing, the DEIS is invalid under NEPA because it fails to consider a reasonable range of alternatives, especially an alternative that would far better meet the Forest Service's claimed purpose and need of addressing wildfire risk and forest health while protecting communities. Such an action alternative would recognize that the current roadless and unmanaged condition of these roadless areas best addresses the issues of wildfire risk, forest health, and community protection, and would close the current loopholes in the Roadless Rule that allow logging under the guise of deceptive euphemisms like wildfire management and wildlife habitat "improve[ment]", as well as expand the Rule to include Inventoried Roadless Areas identified in forest plans and plan revisions but which are not covered by the current Roadless Rule. Such an action alternative would also prohibit livestock grazing in Roadless Areas, given the degradation of forest health and increased wildfire activity resulting from livestock grazing. The fact that the DEIS fails to include such an alternative renders it illegal under NEPA. Nor could the Forest Service simply include this Increased Protection Alternative in the Final EIS, since that would deprive the public of the opportunity to comment on the Increased Protection Alternative and compare it to the current road-building/logging alternatives. Given this, the DEIS must be withdrawn.

Sincerely,

- 350 Eugene
- 350 Pittsburgh
- 350 Salem Oregon
- 350 Seattle
- A2 (Anthropocene Alliance)
- Allegheny Forest Defense Project
- Allegheny-Blue Ridge Alliance

- Alliance for the Wild Rockies
- Athens County's Future Action Network
- Bark
- Battle Creek Alliance
- Biofuelwatch
- Blue Mountains Biodiversity Project
- Bold Visions Conservation
- California Chaparral Institute
- Cascadia Climate Action Now
- Cherokee Concerned Citizens
- Christians Caring for Creation
- Climate Communications Coalition
- Climate Crisis Solutions
- Climate Relations LLC
- Connecticut River Conservancy
- Conservation Congress
- CURE
- Defiance Canyon Raptor Rescue
- Earth Law Center
- Earth Neighborhood Productions
- Eco-Integrity Alliance
- Education, Economics, Environmental, Climate & Health Organization (EEEECHO)
- Fertile Ground Conservancy
- Friends of Bell Smith Springs
- Friends of the Bitterroot
- Friends of the Boundary Waters Wilderness
- Friends of the Clearwater
- Friends of the Kalmiopsis
- Friends of the White Salmon River
- Friends of the Wild Swan
- Fungaia
- Gallatin Wildlife Association
- Gallatin Yellowstone Wilderness Alliance
- Green Cove Defense Coalition
- Green Snohomish
- Greenpeace USA
- Heart of the Gila
- Heartwood
- High Country Forest Watch
- Indiana Forest Alliance
- Izaak Walton League Rapid City SD Chapter
- John Muir Project
- Kettle Range Conservation Group
- Klamath Forest Alliance

- Kootenai Environmental Alliance
- Legacy Forest Defense Coalition
- Legal Rights for the Salish Sea
- Los Padres ForestWatch
- Lower San Pedro Watershed Alliance
- Malach Consulting
- Methow Forest Forum
- Mighty Earth
- Minnesota Division Izaak Walton League of America
- Mount Shasta Bioregional Ecology Center
- MountainTrue
- Move Past Plastic (MPP)
- National Treasure Mustang Rescue and Sanctuary
- Natural Resources Law
- Next 100 Coalition
- New Jersey Forest Watch
- Nimiipuu Protecting the Environment
- Northern Alaska Environmental Center
- Old Growth Forest Network
- Olympic Climate Action
- Oregon Wild Horse Organization
- Partnership for Policy Integrity
- PocketForestsOregon.com
- Prairie Hills Audubon Society
- Prairie Protection
- Projectic
- Protect Thacker Pass
- Public Lands Media
- Rachel Carson Council
- Religious Campaign for Forest Conservation
- RESTORE: The North Woods
- Rock Creek Alliance
- Rockbridge Conservation
- Rootsong Ecology
- Sage Steppe Wild
- Santa Fe Forest Coalition
- Save Lake Superior Association
- Save Massachusetts Forests
- Save Our Cabinets
- Save Our Sky Blue Waters
- Selkirk Conservation Alliance
- Sequoia Forestkeeper
- Standing Trees
- Swan View Coalition

- Tahoe Forests Matter
- Tennessee Heartwood
- The Center for Responsible Forestry
- The Forest Advocate
- The Ocean Project
- Thurston Climate--Tree Action
- Tualatin Riverkeepers
- Tule River Conservancy
- Umpqua Watersheds
- Utah Physicians for a Healthy Environment
- Virginia Wilderness Committee
- We Advocate Thorough Environmental Review
- West Virginia Rivers Coalition
- Western Watersheds Project
- Whatcom Million Trees Project
- Wild Nature Institute
- Wild Watershed
- WildEarth Guardians
- WildLands Defense
- Wilderness Watch
- Wildlife for All
- Wyoming Untrapped
- Wyoming Wildlife Advocates
- Yellowstone to Uintas Connection