September 19, 2025

Via Regulations.gov

Brad Kinder, Director, Ecosystem Management Coordination
U.S. Department of Agriculture
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

RE: Notice of intent to prepare an environmental impact statement to rescind the Roadless Rule (Docket number FS-2025-0001).

Dear Mr. Kinder:

The American Forest Resource Council (AFRC) and California Forestry Association (Calforests) submit the following comments regarding the U.S. Forest Service's notice initiating an environmental impact statement (EIS) and rulemaking concerning the management of Inventoried Roadless Areas (IRA), rescinding the 2001 Roadless Area Conservation Rule (Roadless Rule). 90 Fed. Reg. 42179 (Aug. 29, 2025).

We strongly support modernizing our approach to federal land and resource management by rescinding the Roadless Rule, which unnecessarily prohibits, restricts, or reduces responsible access and active forest management on nearly 59 million acres of federal forest land.

Background

AFRC is a trade association representing mills, wood product manufacturers, loggers, and purchasers of public timber in the Western United States. We have member companies in Montana, Idaho, Washington, Oregon, Nevada, and California who all, to some degree, rely on a robust and reliable supply of timber products from federal forest land to provide the domestic wood products that the American public demands. We support active forest management to

attain productive and healthy public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands.

Calforests is the preeminent trade association and advocate for California's forest industry. Collectively, our members – private forestland owners – manage nearly 3.5 million acres of forest land in California and operate nearly all the state's forest products infrastructure, including sawmills, veneer mills, and biomass power plants. Our members are committed to working with Federal and state agencies to achieve our shared wildfire prevention and forest resiliency goals. We support rural communities and remain committed to working towards finding solutions that achieve desirable outcomes for all.

AFRC and Calforests members manage and operate wood product facilities that are surrounded by some of the most productive forests in the world. In the west, a large proportion of those forests are managed by the federal government, specifically the Forest Service. A robust and predictable supply of timber products from these National Forest System (NFS) lands is a critical component to maintaining and growing our Nation's ability to produce domestic wood products for the American public. This supply is often hindered by a web of federal laws, regulations, policies and decisions – including the Roadless Rule – that complicate access to and management of public forest lands.

The Roadless Rule is Not Based in Science, Nor Scientifically Justified

In practice, the Roadless Rule is not about conservation or "protection." The notion that a paradigm of preservation (no management) rather than conservation (intentional, strategic management) is more effective at "protecting" forest resources is outdated and disconnected with the current threats facing federal forest land.

The Roadless Rule is based on a false, unscientific premise: if we draw artificial lines on a map, do nothing, and walk away, we are "protecting" the environment. This is demonstrably false with catastrophic impacts to our lands, resources, and people.

It is well documented that high-severity wildfire and insect and disease infestation pose the most existential threats to our Nation's forests. When assessing the impacts of the Roadless Rule to these threats, the Department should consider the following facts:

- Nearly half of all roadless acres are in areas rated as high or very high wildfire risk.
- Since the Roadless Rule was enacted, more than 8 million acres of roadless forests have burned—highlighting the consequences of limiting access and management.

- Strategically placed and maintained roads are essential for safe and effective wildfire response and resource management.
- Rescinding the rule allows land managers to reduce fuels and restore healthier, more fire-resilient forests.

There is a growing consensus among the scientific community that active forest management, including timber harvest, is the most effective way to mitigate fire risk. A 2021 study[1] published by Johnston et al. focused on the benefits of mechanical thinning in regard to wildfire mitigation. Key points of that paper include:

- Mechanical thinning can moderate fire behavior in the absence of prescribed fire.
- Modeled crown fire potential declined immediately following thinning, undoubtedly due to significant reductions of ladder fuels that carry fire into the crown and crown density that facilitates spread between crowns.
- Increase in surface fuel and modeled fire behavior was offset by a steady decline in litter and a dramatic decline in duff over time.
- Fuel loading in a dry ponderosa pine forest increased for a year or two after thinning and then declined.
- Woody fuel particles increased somewhat following thinning but litter and duff fuel loading declined dramatically as a result of thinning.

A 2023 paper[2] by some of the same authors made similar conclusions about the role of mechanical thinning in mitigating fire risk:

- Mechanical thinning aids in restoring tree and understory vegetation conditions associated with forest resilience to disturbance.
- In forests where thinning reduces stand density, vigorous overstory trees and increased herbaceous cover can help facilitate the re-establishment of low intensity surface fire regimes that maintain stable and persistent vegetative states.
- Elements of forest resilience can be restored in dry forest systems via selective thinning to promote historical forest structure.

[1] Johnston, James D., et al. *Mechanical thinning without prescribed fire moderates wildfire behavior in an Eastern Oregon, USA ponderosa pine forest*. Forestry and Ecology. 501 (2021) 119674.
[2] Johnston, James D., et al. *Mechanical thinning restores ecological functions in a seasonally dry ponderosa pine forest in the inland Pacific Northwest, USA.* Forest Ecology and Management. 546 (2023) 121371.

Research also indicates that active forest management mitigates insect infestations, which have a direct correlation to wildfire risk. A 2007 study[3] made the following conclusions:

- Factors involving tree density are consistently associated with the occurrence and severity of bark beetle infestations. Management to reduce stand or landscape-level susceptibility to bark beetles must address factors related to tree density.
- Thinning's effectiveness as a preventative measure to reduce the amount of bark beetle caused tree mortality is supported by the scientific literature.

A study[4] published this year, which focused on commercial thinning in California's Sierra Nevada Mountains, made similar conclusions:

- Thinning treatments not only reduce fire severity and its carbon consequences but also bolster forests' capacity to withstand and recover from climate extremes.
- Treatments reduced average fire severity by 32% and the prevalence of high-severity fire by 88%.

A 2024 study[5] that explored constraints on expanding mechanical fuels reduction treatments to effectively address the Forest Service's wildfire crisis specifically addressed the role of a viable road network. The study considered the ability to effectively manage 21 priority landscapes under the status quo. One of the primary limiting factors to treating these landscapes was the **absence of existing road infrastructure and the inability of the agency to construct new roads**.

The study concluded that "Investing in steep-slope systems, **expanding use of temporary roads**, and revising administrative rules to allow for appropriately tailored mechanical thinning in special conservation areas are possible ways to meet fuel reduction treatment objectives of the USDA Forest Service Wildfire Crisis Strategy in twenty-one landscapes across the western United States. Broadening the land base available for mechanical treatment allows for flexibility to develop treatment plans that optimize across the multiple dimensions of effective landscape-scale fuel treatment design and restore fire as a key ecosystem process."

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[3] Fettig, C.J., et al. 2007. *The effectiveness of vegetation management practices for prevention and control of bark beetle infestations in coniferous forests of the western and southern United States*. Forest Ecology and Management 238, 24-53.

[4] Yackulic E, et al., (2025) *Rising from the ashes: treatments stabilize carbon storage in California's frequent-fire forests*. Front. For. Glob. Change 8:1498430. doi: 10.3389/ffgc.2025.1498430.

[5] Woolsey, George A., et al. *Constraints on Mechanical Fuel Reduction Treatments in United States Forest Service Wildfire Crisis Strategy Priority Landscapes*. Journal of Forestry, 2024, XX, 1–17. 2024. https://doi.org/10.1093/jofore/fvae012

We urge the Department to include this body of research and science in the ensuing Environmental Impact Statement (EIS) to highlight the positive effects of rescinding the Roadless Rule as they relate to active forest management that addresses forest health and wildfire risk reduction. Simply put, implementing scientifically-based active management treatments at the pace and scale required to address our federal wildfire and forest health risks is made impossible by the Roadless Rule.

Lack of forest management and increased wildfire risk on federal lands poses significant wildfire risk on private timber lands, as wildfire does not recognize property lines. For example, Calforests members share in excess of 7,000 miles of adjacent ownership with Federal lands, making implementation of treatments across boundaries that much more important. The Roadless Rule not only has wildfire risk impacts on federal lands, but implications for increasing wildfire risk on adjacent private timber lands as well when these forest management activities are prohibited or significantly reduced.

Rescinding the Roadless Rule Helps Protect Firefighters, Public Access, and Communities

The Department should also focus on the correlation between unroaded areas and effective wildfire suppression. A significant factor contributing to increased fire activity is the decreasing road access to our federal lands. In nearly every major wildfire over the past 15–20 years, the Forest Service has identified the lack of road access as a key barrier to effective response. Building new roads mid-crisis is inefficient and dangerous.

When fires start in remote areas, it often takes days for the Forest Service to build temporary roads just to get equipment on-site. On the other hand, maintaining access in advance saves valuable time and resources. Having roads in place, including ones that are closed but can be quickly reopened, allows firefighting crews to access ignition points faster and prevent small fires from becoming large, destructive events.

Some stakeholders have falsely claimed that rescinding the Roadless Rule will lead to more human-caused fire ignitions. We encourage the Department to tackle this issue head-on in its EIS. This false assertion argues that roads increase public access to public lands, and this access increases the likelihood of human-caused fire ignitions. Rescinding the Roadless Rule does not require new road building, and not all roads must be open to the public all the time. The Forest Service routinely restricts access to certain roads using gates, locks, and barriers, especially in areas with sensitive wildlife or fire concerns. Roads can be managed to reduce ignition risks. Agencies can control access to prevent human caused ignitions while maintaining roads for emergency response, fuels treatment, and maintenance.

For a real-world illustration, the Department could simply look at how private forestland is managed. Private lands in the west typically contain a well-managed and maintained road network. However, landowners strategically close certain roads during the fire season to limit public access. They also decommission and block roads that are not needed in the near-term. Those roads can be quickly reopened in the event of a fire. A similar approach can be adopted by the Forest Service on a larger landscape with the recission of the Roadless Rule. **These decisions should be made by local experts and leaders based on local conditions and in consultation with firefighters, users, and the public – not by a one-size-fits-all approach decided in Washington, D.C.**

Rescinding the Roadless Rule is about Active Management and Better Conservation Outcomes

The Department should clarify in the ensuing EIS that rescinding the Roadless Rule will lead to better resource management and conservation outcomes while maintaining existing, robust environmental safeguards. Activities on all NFS land are extremely restrained and regulated. Any action on NFS land must still comply with strict environmental laws, including the National Environmental Policy Act (NEPA), Endangered Species Act (ESA), Clean Water Act, and individual forest Land Management Plans (LMP). Forest projects must undergo site-specific environmental analysis, public input, and scientific review before proceeding.

Rescission simply removes a blanket prohibition on considering road access—it does not eliminate the rigorous oversight that governs timber harvests on federal land. Federal forests remain among the most heavily regulated lands in the world, and sustainable forest management, not "unrestrained logging," remains the standard.

The benefits of active forest management that would be enabled through rescission of the Roadless Rule on water quality and aquatic health should be highlighted and documented. Active forest management, including density reduction and hazardous fuels reduction, improve forest conditions in riparian areas that are associated with aquatic health. Conclusions from a 2011 study[6] support this notion:

- Fire exclusion has altered the structure, composition, and successional trajectory of riparian forests in fire-prone landscapes.
- Fire exclusion has been associated with increases in tree density and recruitment of shade-tolerate species that may replace large diameter, more decay-resistant Douglas-fir trees.

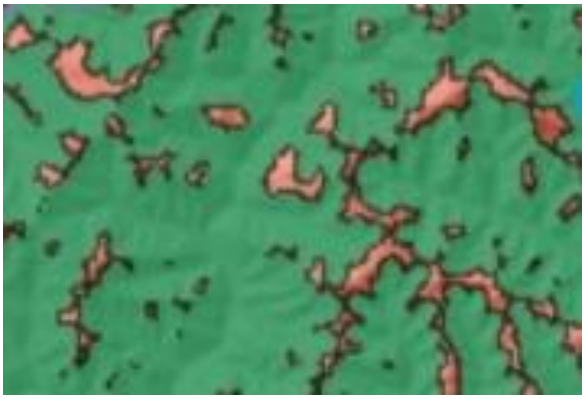
[6] Messier, Michael S., Shatford, Jeff P.A., and Hibbs, David E. 2011. *Fire Exclusion effects on riparian forest dynamics in southwestern Oregon.* Forest Ecology and Management. 264 (2012) 60-71.

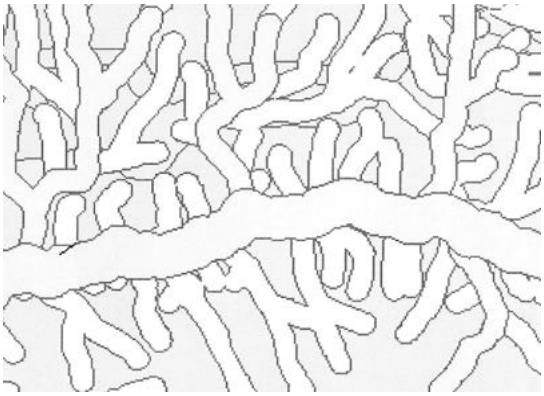
- A hands-off management regime for these riparian forests will have ecologically undesirable consequences.

This "hands-off" management regime is exactly the management paradigm that will continue under the Roadless Rule. Furthermore, all NFS land is governed by LMPs. Those LMPs include standards and guidelines specifically addressing hydrology and aquatic resources which would remain in place if the Roadless Rule were rescinded.

For example, the Northwest Forest Plan (NWFP), which governs the management of over 19 million acres of NFS land in Washington, Oregon, and California, includes an Aquatic Conservation Strategy (ACS). The ACS established Riparian Reserves (protection buffers adjacent to streams and rivers) and Key Watersheds (large blocks of land deemed to have sensitive aquatic resources). Due to the buffer widths established in the NWFP, Riparian Reserve overlays comprise millions of acres in the plan area.

In fact, due to the extent of the stream network and the size of the buffers, Riparian Reserves are effectively not a "network" at all, but rather a large-block land allocation. The two images below illustrate what these Reserve buffers look like in practice. The image on the left is from the North Fork Smith project on the Siuslaw National Forest and shows Late Successional Reserve in pink and Riparian Reserve in green. This Reserve network comprises over 83% of the project area.[7] The image on the right is from a project on the Sweet Home District of the Willamette National Forest and shows the buffers of both perennial and intermittent streams.





Outside of the NWFP area, LMPs contain different versions of the ACS. For example, many National Forests in California are governed by Riparian Conservation Areas (RCA). Like the ACS Riparian Reserves, the RCAs function as land allocations that are managed to maintain or

[7] North Fork Smith, Project Introduction Background. Available at: Siuslaw National Forest | Project Summary (#59122) | Forest Service

restore the structure and function of aquatic, riparian, and meadow ecosystems. The intent of the management direction for RCAs is to 1) preserve, enhance, and restore habitat for riparian- and aquatic-dependent species, 2) ensure that water quality is maintained or restored, 3) enhance habitat conservation for species associated with the transition zone between upslope and riparian areas, and 4) provide greater connectivity within the watershed. The size and extent of the RCAs is similar to that of the ACS Riparian Reserves illustrated above.

It is imperative that the Department acknowledge and emphasize that, in the absence of the Roadless Rule, this vast network of buffers and Land Management Plans that assist in maintaining water quality and aquatic health will remain in place.

Rescinding the Roadless Rule will enable greater active management within the Northwest Forest Plan area

When the NWFP was enacted in 1994, over 80% of the plan's land base was placed in reserved Land Use Allocations (LUAs) where sustained-yield timber production was prohibited. The Matrix LUA, where **sustainable timber harvest was expected to occur**, now accounts for only 16% of the original footprint of the NWFP area. This significant decline in acres available for active management has caused unmeasurable impacts to rural communities, businesses, contractors, and supply chains that rely on federal timber to sustain their livelihoods and operations. For these stakeholders, the management of every acre of Matrix LUA is critical.

Unfortunately, it is operationally infeasible to sustainably manage the entirety of Matrix LUA since approximately 400,000 acres (10%) of the LUA across the NWFP area is overlaid with IRA designation. While timber harvest is not entirely prohibited within IRAs, it is restricted to a degree that prohibits sustainable timber management as required in the Matrix LUA. Furthermore, the feasibility of implementing the restricted level of timber harvest that is permitted in IRAs is complicated by the Rule's prohibition on new road construction. Logging systems that do not require adjacent roads for log removal (i.e. helicopter logging) are extremely expensive and often not a viable option as flight distances become a limiting factor.

Evidence of the Forest Service's unwillingness to manage within IRAs can be seen in the dismal amount of commercial harvest which has taken place in the Matrix LUA since the Roadless Rule was enacted. Publicly available records indicate that, between 2002 and 2024, only **638 acres** of commercial timber harvest have occurred within the Matrix LUA which is overlaid by roadless designation. That means the Forest Service treated **0.15%** of roadless areas within the Matrix LUA in the last 20 years. It is also worth noting that the vast majority of these projects have occurred along existing roads which immediately abut roadless areas. In other words, the Roadless Rule has effectively placed an additional 10% of the Matrix LUA into a reserved allocation.

The Forest Service is currently working to amend the Northwest Forest Plan to increase active management, reduce wildfire risks, protect communities, and increase timber production to support the remaining milling infrastructure, workforce, and rural counties. As the Department works to rescind the Roadless Rule and amend the Northwest Forest Plan simultaneously, we urge the Department to ensure these processes are consistent and compatible. At a minimum, the rescission of the Roadless Rule should lead to a significant increase in both the acres actively managed and annual timber harvest levels in a final amendment.

Conclusion

We appreciate the opportunity to provide comments on the proposed Roadless Rule recission, an important course-correction to an outdated, inefficient and failed "passive" management paradigm. This one-size-fits-all policy has not worked, and will not work to conserve our federal forests into the future, across nearly 59 million acres of diverse, dynamic landscapes. Rescinding the rule would give local land managers, stakeholders, and experts flexibility to tailor solutions based on forest conditions, fire risk, and ecological needs. This has significant implications for private, state, county, tribal, and small forest landowners and managers who share boundaries with federal lands.

Rescinding the Roadless Rule would also meaningfully expand science-based active forest management, reduce the risk of catastrophic wildfire, protect communities and public health, and increase domestic timber supply to meet our Nation's demand for locally made wood products – exactly what the President is calling for. AFRC, Calforests, and their members are committed to working with the Department and the Forest Service at all levels of the agency to meet these goals.

Sincerely,

Travis Joseph
President/CEO

Matt Dias
President/CEO