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201 14th Street SW  
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Washington, DC 20250-1124

September 18, 2025

Re: 2001 Roadless Area Conservation Rule (2001 Roadless Rule) ([66 FR 3244](#), [36 CFR Subpart B](#) (2001))

Dear Mr. Kinder,

Jackson Hole Wildlife Foundation (JHWF) appreciates this opportunity to provide comments on the proposed rescindment of the 2001 Roadless Area Conservation Rule (2001 Roadless Rule) ([66 FR 3244](#), [36 CFR Subpart B](#) (2001)).

JHWF is a 501(c)(3) nonprofit established in 1993. We work to help communities live more compatibly with wildlife. That means grounding decisions in science, advancing projects that protect wildlife and habitat, and ensuring conservation is achieved through broad cooperation. A key focus is protecting migration corridors by conserving vital habitat through science-based, collaborative efforts. We lead volunteer-driven, hands-on projects—like fence removal and modification, highway and traffic mitigation, and habitat restoration—that deliver real, lasting benefits for wildlife across the landscape.

**We oppose the rescindment of the 2001 Roadless Area Conservation Rule (2001 Roadless Rule).** The areas currently protected by the Roadless Rule are critical for wildlife, as they provide large, undisturbed blocks of connected habitat (Selva et al., 2015). The rule's preservation of intact landscapes is vital for the long-term health and survival of numerous species (Jones, 2011). The rescission of this rule would have a profound impact on wildlife across the nation.

The primary concern regarding the rescission is the resulting habitat fragmentation. Habitat fragmentation occurs when a continuous habitat is broken into smaller, disconnected pieces, often by roads and development (Clevenger and Huijser, 2011). This can have devastating effects on wildlife, including:

- **Reduced Access to Resources:** Wildlife's ability to find food and water is limited when their habitat is discontinuous (Mullu, 2016).

- **Increased Risk of Injury and Death:** The introduction of roads and increased human presence leads to a higher risk of injury and death for wildlife as they migrate, look for a mate, or look for resources, due to wildlife-vehicle collisions (Clevenger and Huijser, 2011).
- **Loss of Genetic Diversity:** As populations become isolated in smaller habitat patches, they are unable to interbreed with other populations, leading to reduced genetic diversity and making them more vulnerable to disease and less adaptable to environmental changes. This can lead to the long-term extirpation of species in these areas. For some species that have precariously low populations, this can be a contributing factor to extinction (Lino et al. 2019).

An additional concern of revoking the Roadless Rule, is that it may result in new recreational access to previously undisturbed habitats that are critical for wildlife. Studies have found that “the presence of dispersed, nonmotorized recreation led to a five-fold decline in the density of native carnivores and a substantial shift in community composition from native to nonnative species” (Reed and Merenlender, 2008).

Roadless areas are particularly important for species with large movement areas such as elk, pronghorn, mule deer, grizzly bears, wolves, wolverine, and mountain lions that require large contiguous landscapes to thrive and whose population abundance has been found to be negatively impacted by roads (Fahrig and Rytwinski, 2009). They also provide crucial habitat for hundreds of threatened, endangered, and sensitive species (Selva et al., 2015). **By opening these areas to development, we risk unraveling the protections that have safeguarded these species for decades.**

Furthermore, repealing the 2001 Roadless Rule would undermine efforts to protect critical watersheds and the aquatic species that depend on them. Road construction and logging can lead to increased erosion and sedimentation, polluting streams and rivers, harming native fish and invertebrate populations, and spreading toxins into valleys that sustain both wildlife and human communities (Megahan, 1997; Boston, 2016).

## Conclusion

Rescinding the Roadless Rule would be particularly damaging to the unique and vulnerable landscapes of the American West, where Jackson Hole Wildlife Foundation carries out our work. The West's ecosystems are already under immense pressure from climate-related stressors like severe drought and the increased recreational use that has surged in recent years. Introducing new road networks into these remaining undisturbed areas would fragment critical wildlife habitat and disrupt the delicate ecological balance that these species depend on. Therefore, maintaining the Roadless Rule is not just a matter of conservation; it is an essential measure to safeguard the long-term health and resilience of the West's invaluable natural heritage.

Sincerely,

*Renee Seidler*

Renee Seidler  
Executive Director, Jackson Hole Wildlife Foundation

## Citations

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