Wyoming Conservation Community Comment on the Draft Environmental Impact Statement (DEIS) and Proposed Rule to Rescind the Roadless Area Conservation Rule

October 6, 2026

Comments electronically submitted at:
https://www.regulations.gov/commenton/FS-2025-0001-223869

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Re: Comments on Docket FS-2025-0001-223869: Special Areas; Roadless Area Conservation; National Forest System Lands (91 FR 53,827 August 20, 2026), the associated Draft Environmental Impact Statement, and available supporting documentation

Dear Director White,

On behalf of the nineteen undersigned Wyoming based organizations and businesses, and our thousands of members and supporters from across both Wyoming and the nation, we submit these comments in response to the August 20, 2026 Draft Environmental Impact Statement (DEIS) and Proposed Rule. We stand in strong and unanimous support for the "No Action" alternative that would keep the 2001 Roadless Area Conservation Rule (Roadless Rule) in place, protecting the wildest parts of our public forests. Thank you for your consideration of the comments made in this letter.

Introduction

The proposed action of rescinding the 2001 Roadless Rule, analyzed as Alternative 2 in the DEIS, jeopardizes more than 45 million acres of undeveloped backcountry forestland managed by the U.S. Forest Service, comprising around a third of the territory in our national forest system. In Wyoming, Inventoried Roadless Areas (IRAs) make up 3.2 million acres[1], which is over 5% of Wyoming's land and over 35% of the state's National Forest System Lands. IRAs protect more than 5,000 river miles and the watersheds they flow through provide water for nearly 120,000 Wyoming residents. IRAs in Wyoming act as the connective tissue between the celebrated lands that make up the Greater Yellowstone Ecosystem, such as Yellowstone National Park, Grand Teton National Park, the Gros Ventre and Wind River Ranges, while also protecting additional forests throughout the Medicine Bow and Bighorn Mountain Ranges.

[1]https://wildwyo.maps.arcgis.com/apps/instant/basic/index.html?appid=794a4ab63053447b8b23f31ca294e405

These landscapes have remained intact in part due to the Forest Service's more than 25-year-old commitment to limit road building, logging and other disruptive activities in the areas now protected as Inventoried Roadless Areas.

Our undersigned organizations and businesses and the constituents we represent have a direct interest in the Roadless Rule and protections it offers to the last best forests in our state. Many of the groups signed onto this letter commented on the Notice of Intent in September of 2025. Along with over 99% of the 625,000 other comments the agency received, we were in strong support of maintaining the Roadless Rule as it currently stands, and were in strong opposition to its rescission. Our position on this matter has not changed, as we outline below.

Flawed Purpose and Need

The Purpose and Need frames the proposed rule as a means for reducing regulatory burden, restoring local decision making and increasing management flexibility, but the DEIS does not go on to show that the Roadless Rule is the cause of the identified problems or that rescission is the appropriate remedy. Furthermore, the argument that the Proposed Action is designed to restore local decision making is insincere considering how the statement immediately goes on to share that the action is in fact driven by Executive Order 14225, *Immediate Expansion of American Timber Production*; Executive Order 14154, *Unleashing American Energy*; and Executive Order 14153, *Unleashing Alaska's Extraordinary Resource Potential*.[2]

The argument is then made that the Purpose and Need is to help the Forest Service respond to changing conditions including wildfire risk, insect and disease infestations, and community protection in the Wildland-Urban Interface (WUI), yet the Roadless Rule has exceptions and flexibility as it stands that allow managers to respond to this list of issues already. Furthermore there is evidence that suggests the rescission stands to worsen the same conditions it claims as its need for action. We argue that the agency has failed to provide a "reasoned explanation" for the proposed rescission of the Roadless Rule, and we ask that the Forest Service either revise the Purpose and Need to provide an evidence-based rationale for the effort, or draw the conclusion that the rescission is not appropriate or necessary.

Migration Corridors, Big Game Habitat, and Habitat for At-Risk Species

Roads fragment habitat and degrade the migration corridors that Wyoming's big game herds depend on. Fragmentation occurs when continuous habitat is broken into smaller, disconnected pieces, most often by roads and the development they enable[3]. For elk, pronghorn, and mule deer, which move seasonally across large landscapes, the costs compound: reduced access to forage and water where habitat becomes discontinuous[4], mortality from wildlife-vehicle collisions along new routes[5], and loss of genetic diversity as populations become isolated in smaller

[2] DEIS at 4

[3] Clevenger, A. and M. Huijser. 2011. Wildlife crossing structure handbook: design and evaluation in North America. Federal Highway Administration Technical Report FHWA-CFL/TD-11-003.

[4] Mullu, D. 2016. A review on the effect of habitat fragmentation on ecosystems. Journal of Natural Sciences Research 6(15):1.

[5] See footnote 9

patches and can no longer interbreed[6]. Species that require large, contiguous landscapes, including elk, pronghorn, mule deer, grizzly bears, wolves, wolverine, and mountain lions, show measurably lower abundance where roads are present[7].

Inventoried Roadless Areas keep these corridors intact. They provide large, undisturbed blocks of connected habitat and support hundreds of threatened, endangered, and sensitive species[8]. Preserving connected landscapes becomes increasingly important as species shift their ranges in a changing climate[9]. The lands at stake include lower-elevation forests, wetlands, and canyon bottoms, often the most biologically productive ground and the country wildlife use to move between summer and winter range.

The Department's own analysis reaches the same conclusions. The DEIS identifies fragmentation, barriers to movement and dispersal, direct mortality, and loss of genetic diversity and connectivity among the biodiversity effects of road construction and timber harvest, and states that these impacts would be least under the No Action Alternative[10]. Its draft biological assessment finds that the repeal of the Roadless Rule may affect and is likely to adversely affect 327 ESA-listed species and 71 designated critical habitats[11].

Water

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[12]. This is especially true in Wyoming, a headwater state. Wyoming has 5,062 miles of river within roadless areas across 538 watersheds, providing 118,375 public water system users with a significant portion of their drinking water supply[13]. Our state's roadless areas are currently home to healthy forests that store, filter, and purify drinking water that comes out at the tap for Wyoming residents. Roads, especially those that are not properly maintained, can discharge sediment into streams that contaminate water, block stream flow, and cause irreparable harm to aquatic fish species, and increase water treatment costs for utilities that they pass on to ratepayers. Because it protects these headwaters, the 2001 Roadless Rule is vital for water users downstream to maintain clean drinking water for communities, water for agricultural and industrial use, and ecosystems.

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[6] Lino, A., C. Fonseca, D. Rojas, E. Fischer, and M. João Ramos Pereira. 2019. A meta-analysis of the effects of habitat loss and fragmentation on genetic diversity in mammals. Mammalian Biology 94:69–76.

[7] Fahrig, L., and T. Rytwinski. 2009. Effects of roads on animal abundance: an empirical review and synthesis. Ecology and Society 14(1).

[8] Selva, N., A. Switalski, S. Kreft, and P. L. Ibisch. 2015. Why keep areas road free? The importance of roadless areas. In Handbook of Road Ecology, van der Ree, Smith, and Grilo, eds. John Wiley & Sons.

[9] Jones, A. 2011. The importance of connected and conserved landscapes in a time of changing climate. Utah Environmental Law Review 31(1):135–153.

[10] USDA Forest Service. 2026. Draft Environmental Impact Statement: Special Areas; Roadless Area Conservation, 161–62.

[11] See footnote 15

[12] https://www.fs.usda.gov/managing-land/national-forests-grasslands/water-facts

[13] Conservation Science Partners. 2025. River protection and freshwater benefits provided by U.S. Forest Service Inventoried Roadless Areas. Final Report. Truckee, California, USA.

This argument is valid across all landscapes currently protected under the Roadless Rule, and Wyoming landscapes are no exception. The headwaters of the Snake-Columbia River Gorge, the Mississippi-Missouri Rivers, and the Colorado River can all be found in Wyoming[14]. Beyond the recreational values discussed below, there is a responsibility that comes with managing the headwaters of our nation. The Roadless Rule currently protects significant portions of lands that encompass these waters ensuring their health for communities in Wyoming and all the others downstream.

Despite the water-related benefits provided by intact roadless areas, the agency's findings within the DEIS clearly demonstrate that full and partial rescission (Alternatives 2 and 3) threaten significant and costly harms to the security, reliability, quality, and affordability of drinking water supplies. Specifically, both rescission alternatives will cause:

- More sediment, nutrients, runoff, and higher stream temperatures following additional roads and harvest[15]
- Increasingly frequent and severe landslides and debris flows following new road construction[16]
- More vegetation loss, erosion, compaction and loss of soil productivity[17]
- Major new threats to water quality, reliability, and affordability for vital drinking water supplies potentially affecting ~24+ million people; potential treatment, flood-control, repair, and insurance costs[18]

As such, the agency's rationale for choosing rescission over the retention of the Roadless Rule is misaligned with its own findings within the DEIS.

Indigenous and Cultural Values

In addition to the water and wildlife considerations, it is critical to acknowledge the cultural value of these forests. Many of the lands protected by the Roadless Rule – such as the nearly 1.5 million acres of IRAs protected on the Bridger-Teton National Forest for example – are the ancestral homelands of Indigenous peoples who have stewarded them since time immemorial.

The Forest Service knows this, stating, "The majority sentiment among Tribal governments consulted is opposition to the proposed rescission of the 2001 Roadless Rule, viewing it as a threat to inherent rights, Tribal sovereignty, cultural survival, and the ecological health of ancestral homelands." Opening these lands to extractive industries threatens to irreversibly damage cultural heritage - and the rushed process for rescinding this rule falls short of the federal government's obligation for meaningful government-to-government consultation.

[14] https://rivers.gov/wyoming
[15] DEIS, p. 108, 117-122
[16] DEIS, p. 111-112
[17] DEIS, p. 108
[18] DEIS, p. 119-121

The Department has determined that this rescission "would have substantial direct effects" on Tribal Governments and "therefore warrants consultation under E.O. 13175." By the Department's own account, it received 64 requests for consultation and held 29 consultations, conducted by line officers rather than by the officials with authority to decide this rulemaking. The draft Tribal Summary Impact Statement reflects feedback only through December 5, 2025, before the Draft EIS and Alternative 3 existed. Our Wyoming organizations and businesses urge the Department to complete government-to-government consultation at the Secretary or Deputy Secretary level with every Tribal Government that has requested it, and to issue an updated Tribal Summary Impact Statement for comment before any final rule. A record in which the sovereign governments most directly affected have opposed the action, and in which the Department has conceded the action's effects on their rights, and does not support finalizing either action alternative.

Wildfire

The topic of wildfire on our public lands is a complex issue that is deserving of nuanced attention. Although proponents of rolling back the Roadless Rule have suggested that it is being rescinded in response to wildfire, evidence shows and the DEIS states that the loss of the rule in full (Alternative 2) or even in part (Alternative 3) will exacerbate adverse impacts from wildfire and increase ignitions[19]. The best available scientific information shows us that roads dramatically increase wildfire ignitions, and that most wildfires are human-caused[20]. We are concerned that additional road development in roadless areas would only lead to more wildfires. New 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[21]. Another study showed that more than 90 percent of all wildfires nationwide occurred within half a mile of a road[22]. Roughly half of Wyoming's 3.2 million acres of roadless areas contain potential mature and old growth forests. As in other states, ignition density is higher outside IRAs, with 34% more fires in one mile of roadless areas than within their borders[23].

Additionally, the Supplementary Information in the NOI stated "About 23 percent (10.2 million acres) of inventoried roadless areas managed under the 2001 Roadless Rule are within the Wildland-Urban Interface (WUI) areas … an additional 4.8 million acres are within one mile of the WUI, totaling about 35 percent of these inventoried roadless area acres." Findings by The Wilderness Society[24], using the Forest Service's own data, suggest that only 2.8 million acres of IRAs are located within one mile of the WUI, not 24.5 million. We ask that this figure be reconciled in future draft language regarding this decision process.

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[20]https://link.springer.com/article/10.1186/s42408-026-00450-2

[21]https://www.wilderness.org/sites/default/files/media/file/Summary%20NFS%20roads%20fire%20paper%20-%202025.pdf

[22] https://www.pacificbio.org/publications/wildfire_studies/Roads_And_Wildfires_2007.pdf

[23] https://roadless-rollback.pfpi.net/

[24]https://www.wilderness.org/sites/default/files/media/file/Roadless%20testimony%20on%20WUI%20-%20TWS%202025.pdf

Many challenges to contemporary forest management stem from outdated Forest Plans, some of which are decades old and were not designed to address modern realities such as expanding WUI areas, the spread of fire-prone invasive species (e.g., cheatgrass), shifting precipitation patterns, and increasingly severe wildfire risks. Rather than rescinding the Rule—a move likely to produce unintended ecological, social, and economic consequences—the Administration should prioritize updating and investing in modern Forest Plans. Modernized plans can more effectively address current forest management challenges, incorporate meaningful local input, enhance resilience to climate and development pressures, and reduce vulnerability to litigation.

Recreation

Protected roadless areas offer abundant outdoor recreation opportunities. The enactment of the Roadless Rule in 2001 have enabled these places to remain wild, intact and high quality ecosystems -- a rarity given man's growing footprint on the earth. Every year, millions of people take advantage of the free (or extremely affordable) access to these public lands. According to maps from Outdoor Alliance's GIS Lab[25], 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. Large sections of the Continental Divide, Pacific Crest, and Appalachian National Trails traverse protected roadless areas. The agency supports this data stating, "...the national forests that include currently inventoried roadless areas receive about 125 million visits annually or 76 percent of the 164 million visits each year to all NFS lands."[26] The DEIS also admits that recreationists will suffer both short term[27] and long term[28] impacts if the rule is rescinded.

In Wyoming, outdoor recreation generated $2.2 billion in 2023, according to the University of Wyoming Outdoor Recreation Report, and visitors to the state generated $4.8 billion, including $263 million in travel-related tax revenue[29]. Outdoor recreation now accounts for 4.1% of Wyoming's GDP, which is the fifth highest in the nation according to the Bureau of Economic Analysis and makes up nearly 16,000 jobs. It is plain to see that IRAs across Wyoming are central to these numbers. They are lands regularly accessed and cherished for hunting, fishing, skiing, snowshoeing, biking, hiking, camping, snowmobiling, kayaking, rock climbing, wildlife watching, and more. The experience recreators have in roadless areas is often due in large part to the attributes the rule protects, from opportunities for solitude to abundant wildlife. An example of this is the fact that hunters in Wyoming are exponentially more likely to tag out when elk hunting in roadless areas[30]. From Mount Glory on Teton Pass, to the foothills of the Wind River and Bighorn Mountain Ranges, to the iconic Snowy Range, Wyoming's wild allure can be

[25]https://outdooralliance.maps.arcgis.com/apps/instant/basic/index.html?appid=bffb3fe5fdfb43519a84c6a0cf4f8ff5&emci=6d6341da-c35d-f011-8f7c-6045bda9d96b&emdi=cf14ddff-7c5e-f011-8dc9-6045bdfe8e9c&ceid=5072891
[26] DEIS at 163
[27] DEIS at 11
[28] DEIS at 233
[29]https://www.uwyo.edu/news/2025/01/uws-worth-institute-releases-report-on-economic-and-community-benefits-of-outdoor-recreation-in-wyoming.html
[30] https://www.tu.org/wp-content/uploads/2026/03/TU-ROADLESS-REPORT_0401_web.pdf

attributed to protections like the Roadless Rule. Rescinding this rule could jeopardize the integrity of the beloved places it safeguards and the economic benefits it affords us.

Maintenance Backlog and Timber Economics

With the Roadless Rule in place, the Forest Service already has a 380,000-mile road system – twice as long as the nation's highway system – crisscrossing national forests[31]. This road system contributes to an agency-wide deferred maintenance backlog that was already over $8.6 billion[32] in fiscal year 2023, and both Alternatives 2 and 3 stand to increase this deficit[33]. The DEIS estimates that new road construction in the lower 48 states commonly costs roughly $80,000 to $100,000 per mile, with higher costs possible in remote roadless terrain[34]. In the Proposed Rule, the agency explains, "any efficiency gains are expected to be incremental and limited by road costs, maintenance funding gaps, and the $6.9 billion deferred maintenance backlog for roads and bridges."[35] We suggest that the agency prioritizes maintaining the roads that Wyoming already has in place over the creation of new roads and exacerbation of this maintenance backlog.

The cost of opening up roadless areas for timber extraction is likewise a concern. The agency's own economic analysis projects comparatively modest timber receipts from rescission and identifies recreation and nonmarket losses.[36] This contradicts the Purpose and Need Statements, which cite E.O. 14225 and President Trump's direction that it, "is in the national interest to unleash America's affordable and reliable energy and natural resources."[37] Yet, even with the Roadless Rule in place, 49 million acres of USFS land are open for timber management[38]. In fact, since the rule was instituted in 2001, a consistently higher percentage of USFS land has been logged in Wyoming compared to private and other ownership classes, with board feet sold on Wyoming's national forests doubling between 2000 and 2022[39].

Though responsible timber production is an acceptable use on some areas within national forests, we stand strongly behind the belief that roadless areas are inappropriate for such logging and other extractive uses and ought to continue to be managed for their roadless values. Logging within roadless areas comes at a greater ecological cost than other landscapes due to their intactness and remote nature. As previously stated, logging and road-building in roadless areas stands to diminish wildlife habitat, recreational opportunities, place culturally significant lands at risk, threaten drinking water sources and could even contribute to climate change due to the targeting of older trees that provide carbon sinks[40]. Our roadless areas are most valuable when they are left intact.

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[31] https://www.fs.usda.gov/eng/road_mgt/statistics.shtml
[32] https://www.fs.usda.gov/science-technology/infrastructure/maintaining
[33] DEIS pg 50
[34] DEIS at 42–47
[35] Proposed Rule at 3
[36] DEIS at 220–25
[37] DEIS at 11
[38] https://www.fs.usda.gov/about-agency/newsroom/by-the-numbers
[39] https://www.bber.umt.edu/pubs/forest/fidacs/WY2022Tables.pdf
[40] Talty, M. et al. "Conservation value of national forest roadless areas." Conservation Science and Practice (2020) 2:11.https://doi.org/10.1111/csp2.288.

Policy Has Built-In Exceptions

The argument that the Roadless Rule needs to be rescinded due to the burdensome barriers placed on our public land managers is overstated. The rule has built in flexibility and has often allowed for necessary forest management such as the construction of roads as needed to address fires, floods, or other catastrophic events, and other circumstances like the need to connect communities. National forest managers routinely conduct forest stewardship activities within roadless areas such as prescribed burning and wildlife habitat improvement activities and are granted necessary permissions when the circumstances require them. In fact, in Wyoming roughly a third of USFS acres treated to reduce hazardous fuels have been in roadless areas. This is proportional to the roughly one third of land in the state that is inventoried roadless[41]. Though additional treatments are needed, across Wyoming Forests there is work being done to maintain the WUI, even within landscapes currently protected as Inventoried Roadless Areas. We recommend that resources are focused on such projects rather than on the loosening of protections afforded by the Roadless Rule.

Timeline for Rescission

Before the Roadless Rule was originally adopted in 2001, the Forest Service provided a total of 129 days for the public to comment on the Notice of Intent (NOI) and the Proposed Roadless Rule and held more than 400 public meetings across the country after issuing the proposed rule. The adoption of the Roadless Rule in 2001 followed the most extensive public engagement process for any federal rulemaking in US history at the time. And even when the Bush administration sought to rescind the Rule in 2005, the Forest Service ultimately offered over 120 days for public comment on the proposed rescission. In 2025 following the NOI to rescind the rule, our groups wrote to the agency and pointed out that the 21-day comment period allotted was inadequate for the proposed action, yet no extension was granted. In August of 2026 following the release of the DEIS and proposed rule, we wrote again pointing out that the 32-day comment period was also inadequate by the Forest Service's own standards, and while we are grateful to have received the 15-day extension, we maintain that a 47-day comment period for an environmental analysis and proposed rule of this magnitude and significance is still not enough time for meaningful public review and response. As the end of the comment period draws near, we are also disheartened that not a single public hearing was offered in the continental United States on this major proposed change.

Support for the “No Action” Alternative

Our strong support of the “No Action” Alternative is heavily informed by our strong opposition to both Alternatives 2 and 3. The proposed rule–analyzed as Alternative 2 in the DEIS -- would remove the Roadless Rule’s protections against commercial logging and road building from nearly 45 million acres of intact public forests, including over 3.2 million here in Wyoming. Alternative 3 is far from offering a meaningful alternative to a full rescission in that it removes roughly three fourths of lands currently listed as IRAs from protection via excessive and arbitrary methods. Based on our groups’ analysis of the DEIS, it is inappropriate to consider Alternative 3

[41] https://storymaps.arcgis.com/stories/3aecb3a57df8494d8c74582686feaefa

as a middle ground proposal, as it would strip 30 million acres, the majority of the Roadless protection from intact Forests across the country, including two-thirds of the IRAs here in Wyoming rather than taking a measured approach or working within the already flexible confines of the Rule. The DEIS is clear that both Alternative 2 and 3 stand to have negative impacts economically[42], on wildfire risk[43], for recreationists[44] and for our water[45]. The only acceptable Alternative for our country and the people of Wyoming is the "No Action" Alternative.

Conclusion

The rescission of this popular rule stands to devastate migration corridors, ecological integrity, clean drinking water, cultural resources, outdoor recreation and wide open spaces that all Wyoming residents enjoy. The value of these protected lands extends far beyond our state borders, roadless forests across the country benefit all Americans, as well as attract visitors from around the globe. Rescinding this rule stands to have negative effects for all of these people[46]. The arguments made to justify this action are flawed as we have outlined above. Please heed our support of the "No Action" Alternative and safeguard the 2001 Roadless Areas Conservation Rule as it currently stands.

Sincerely,

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[42] DEIS at 50
[43] DEIS at 26
[44] DEIS at 233
[45] See footnotes 14-17
[46] DEIS at 26

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