

RE: Docket FS-2025-0001 / RIN 0596-AD66

Comment of the Upper Gila Watershed Alliance in Opposition to the Proposed Rescission of the 2001 Roadless Area Conservation Rule

Submitted to: Director, Ecosystem Management Coordination, USDA Forest Service
Via: Regulations.gov, Docket FS-2025-0001

Dear Director Kinder and USDA Forest Service staff,

The Upper Gila Watershed Alliance (UGWA) submits this comment in strong opposition to the proposed rescission of the 2001 Roadless Area Conservation Rule and the accompanying Draft Environmental Impact Statement. UGWA has worked to conserve the Upper Gila watershed and its public lands since 1996, and we write from both that institutional record and a personal connection to this rule that we believe the agency should consider.

Until his death in January 2025, one of UGWA's own board members was Jim Furnish — retired Deputy Chief of the U.S. Forest Service and the principal author of the very rule this agency now proposes to unwind. Jim led the team under Chief Mike Dombeck that wrote the 2001 Roadless Rule after a multi-year process involving unprecedented public engagement — 1.6 million comments, the most of any rule in the agency's history. He spent the rest of his life, including his final years in Gila, New Mexico, defending that rule and the 44.7 million acres it protects. We do not believe it is rhetorical excess to say that a man who devoted a 34-year Forest Service career and a lifetime afterward to this policy would regard its rescission — attempted, in its initial form, in a three-week comment window — as a betrayal of both the science and the process he helped build. We ask the agency to weigh that this proposal is opposed not only by outside advocates but also by the very career Forest Service leadership that created the rule being undone.

On process: We acknowledge and appreciate the Department's 15-day extension of the comment period to October 6, 2026. We nonetheless urge the Forest Service to recognize that a rule affecting 44.7 million acres warrants a comment period and hearing schedule measured in months, not weeks, including in-person hearings in the states most directly affected. New Mexico alone has roughly 1.6 million roadless acres at stake, including inventoried roadless areas in the Gila National Forest that UGWA has worked to protect for three decades.

We also note that concern over this proposal is not limited to conservation advocates. More than 45 members of the U.S. House and Senate have co-sponsored legislation to codify the Roadless Rule into permanent statute, specifically to ensure that a rule of this consequence cannot be reversed by unilateral agency action of the kind now proposed. A policy with that degree of durable, bipartisan support warrants more deliberate treatment than a truncated rulemaking process affords.

On substance, we ask that the Final EIS specifically and quantitatively address the following, which the draft treats inadequately:

1. Cumulative climate impacts. Intact, unfragmented forests are among the most effective carbon stores in this country. Earth system scientists tracking planetary boundaries report that seven of nine boundaries governing a stable planet — including climate change and land-system change — have now been transgressed. Against that backdrop, the EIS should quantify the carbon and climate-stability costs of increased road construction and harvest in roadless areas, rather than treating each forest as an isolated management decision.

2. Biodiversity and migration corridors. Roadless areas comprise roughly two percent of land in the lower 48 states, yet provide habitat for an estimated 57 percent of the nation's most vulnerable wildlife, including California condors, grizzly bears and wolves in the Greater Yellowstone ecosystem, and native salmon and trout throughout the Pacific Northwest. These areas are equally critical as unfragmented migration corridors: elk, mule deer, and other game species depend on roadless terrain to move safely between seasonal ranges. The EIS should require forest-specific, species-level habitat and connectivity analysis, not aggregated, generalized findings.

3. Recreation and public access. Roadless areas are the backbone of the nation's outdoor recreation economy. According to GIS mapping compiled by the Outdoor Alliance, protected roadless areas contain more than 11,000 climbing routes and boulder problems, over 1,000 whitewater paddling runs, nearly 44,000 miles of trail, and more than 20,000 miles of mountain biking trail, along with major segments of the Continental Divide, Pacific Crest, and

Appalachian National Scenic Trails. The draft EIS fails to analyze the recreation-access or local-economy impacts of converting these areas to industrial use.

4. Wildfire risk. To the extent this proposal is justified by wildfire management needs, the available research does not support that rationale. Peer-reviewed research by The Wilderness Society, examining Forest Service fire data from 1992 to 2024, found that wildfires were roughly four times more likely to originate in roaded forests than in roadless tracts. A separately published study found that more than 90 percent of wildfires nationwide ignite within a half-mile of a road. Roads correlate with higher, not lower, rates of fire ignition. The EIS should directly address this body of research rather than asserting a wildfire-risk rationale without evidentiary support.

5. Erosion and watershed impacts. Roads are the largest single source of sediment pollution in forested watersheds, degrading the streams and fisheries that downstream communities like ours depend on. In mountainous terrain such as the Gila, roads are also a leading trigger of landslides. The EIS should analyze sedimentation and slope-stability risk at the watershed scale, not merely at individual road segments.

6. Drinking water infrastructure. According to the Forest Service's own published data, National Forest System lands are the largest source of municipal drinking water in the country, providing drinking water to more than 60 million Americans in 3,400 communities across 33 states — including major portions of the water supply for Los Angeles, Portland, Denver, and Atlanta. Because roads are a leading source of sediment and contaminant loading in forest watersheds, the EIS should quantify the water-quality and water-treatment-cost impacts of new road construction on these municipal supplies, consistent with the agency's findings on the value of intact forest watersheds.

7. Fiscal responsibility. The Forest Service already maintains a 380,000-mile road system — roughly twice the length of the U.S. Interstate Highway System — and has a maintenance backlog exceeding \$10.8 billion on that network. Given recent, well-documented reductions in Forest Service staffing, the EIS should specify how new road construction and maintenance in currently roadless terrain would be funded and staffed, and analyze whether it offers wildfire-risk reduction superior to lower-impact treatments — such as prescribed burning and habitat improvement work — already permitted under the existing rule's exceptions for fire, flood, and other emergency circumstances.

8. Tribal consultation. The Final EIS should fully document and respond to Tribal input, given the treaty and cultural significance of inventoried roadless areas to Tribal nations, including those with ancestral and ongoing ties to the Gila watershed. This is particularly urgent in regions such as Alaska, where roadless areas sustain subsistence hunting, fishing, and gathering, practices integral to food security and cultural continuity for Indigenous communities.

UGWA does not ask the Forest Service to disregard legitimate local forest-management needs, which can be addressed through the existing rule's established exception process. Instead, we ask that a change of this magnitude and permanence be made through a process that honors the standard the rule's own authors set for it a quarter-century ago: rigorous, transparent, and genuinely open to the public whose lands are at stake.

Jim Furnish spent his career and much of his life afterward defending the principle that these are public lands rather than lands to be quietly reallocated. We ask the Forest Service to honor that legacy by giving this proposal the scrutiny it deserves.

Respectfully submitted,

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