



Stephen Alexander Vaden  
Deputy Secretary  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250  
Submitted electronically via the [Federal eRulemaking Portal](#)

October 6, 2026

Subject: Comments on the Draft Environmental Impact Statement and Proposed Rescission of the 2001 Roadless Area Conservation Rule (Docket ID: FS-2025-0001; RIN 0596-AD66)

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Dear Deputy Secretary Vaden,

The Wildlife Society (TWS), founded in 1936, is a professional society advocating for science-based wildlife management and conservation. Amongst the thousands of dedicated members and 56 Chapters (often organized by state or province), are eight Sections. These comments are being submitted on behalf of the Central Mountains and Plains Section (CMPS), which represents TWS members in Utah, Colorado, Wyoming, Kansas, Nebraska, North Dakota, and South Dakota.

This proposed federal action is of interest to CMPS because within our seven-state territory, there are 7.6 million acres of Inventoried Roadless Areas (IRA) that would be impacted by this proposed national rule repeal. These lands support a variety of ecosystems, species and genes — collectively referred to as biological diversity — along with important processes that tie these all together. Forests provide important habitats that support 80% of land-based wildlife species<sup>1</sup>. Given the worldwide decline in biodiversity, including increasing stressors to wildlife in our seven states, CMPS is opposed to the whole-sale rescission of the 2001 Roadless Rule. After extensive planning and public input, the Forest Service recognized that timber harvest and road construction have “the greatest likelihood of altering and fragmenting landscapes, resulting in immediate, long-term loss of roadless area values and characteristics.” Thus, this notable Forest Service regulation was put in place to preserve parts of our National Forest network and ensure that these places of great ecological and recreational value remain open, accessible and mostly unchanged – thus reducing pressures across a wide range of wildlife species.

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<sup>1</sup> <https://www.un.org/sustainabledevelopment/biodiversity/>

CMPS is not only concerned about the scope and breadth of the harm that will occur as a result of full rescission of the Roadless Rule, as is being proposed by the U.S. Forest Service, but the inadequate analyses in the Draft EIS about the impacts to wildlife. Road construction, reconstruction, and commercial timber harvesting in roadless areas (beyond what is already allowed) are expected to have a wide range of deleterious effects, including but not limited to, (1) watershed disturbance, (2) infrastructure maintenance, (3) impacts to recreationists and hunter/angler experiences, (4) wildlife disturbance, (5) habitat fragmentation, and (6) wildfire management.

1. Watershed disturbance - Roadless forests act as natural filters for major watersheds. The construction of new roads increases soil erosion, runs the risk of lowering water clarity, and could result in higher costs for water filtration and treatment for municipal water utilities. In particular, the Wasatch Front in Utah may be heavily impacted.
2. Infrastructure maintenance - One of the main reasons the 2001 Roadless Rule was adopted was to reduce the burden on taxpayers and the Forest Service associated with road maintenance. Thus, concerns are valid that creating new roads would greatly increase the costs of maintaining roads for the U.S. Forest, which already has a \$6.9 billion deferred maintenance backlog of for roads and bridges. Taxpayers will bear the financial burden of constructing and maintaining new roads at a time when funding is already insufficient to maintain existing infrastructure.
3. Human experience - Creating new roads may significantly negatively impact the experiences sought by backcountry recreationists, including hunters and anglers. Many prefer to recreate and/or hunt/fish in remote areas. Additional roads will increase motorized access and recreation density in previously remote habitats, degrading backcountry recreational experiences.
4. Wildlife disturbance - Construction of roads, as well as vehicle traffic from roads, may negatively impact wildlife, especially during sensitive times of the year like breeding season. Habitat fragmentation, the creation of additional edge habitat along roads, and the additional presence of roads could impact a number of species, especially more mobile species those with larger home ranges.
5. Habitat fragmentation - Roadless areas represent large areas of habitat with connectivity. This is often needed for many megafauna species, including bears, deer, and elk. Road construction may fragment wildlife habitat, and may also increase human-wildlife conflict, particularly vehicular collisions with wildlife. North Dakota, South Dakota, Wyoming, and Utah all have migration corridors and large tracts of wildlife habitat without roads that would be negatively impacted.
6. Wildfire management - Greater than 80% of wildfires start within close proximity of roads due to human activity. Expanding road networks into remote areas increases human-caused wildfire risk, as well as presents increased opportunity for the spread of invasive species.

It is important to note that the 2001 Roadless Rule allows for responsible forestry when actions are necessary to address a critical need. The rule allows for road construction where necessary to address imminent safety threats, such as from wildfires. When these actions are pursued,

the management is strategic and balanced with the need to preserve intact forest resources.

CMPS is opposed to the U.S. Forest Service proposal to fully rescinding the 2001 Roadless Area Conservation Rule. As a section of The Wildlife Society, CMPS also draws attention to and provides support for the comments submitted by The Wildlife Society.

If we can provide any additional data or information about impacts on wildlife, please do not hesitate to reach out. Thank you for your time and consideration of our comment.

Respectfully submitted on behalf of the CMPS Board,

A handwritten signature in black ink that reads "Barbara Sugarman". The script is fluid and cursive, with the first name "Barbara" and last name "Sugarman" clearly legible.

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