



Comments on the USDA, USFS Special Areas; Roadless Conservation Proposed Rule

[Docket No. FS-2025-0001]

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The Invasive Species Working Group (ISWG) of The Wildlife Society promotes the control, mitigation, and prevention of invasive species' introduction to improve natural resources for wildlife. Our working group is designed to provide networking, educational, and public outreach opportunities for professionals and students interested in invasive species science. As the primary source of expertise among wildlife professionals on the issue of invasive species, we offer the following comments and concerns to the USDA and USFS about the proposed rescission of the 2001 Roadless Area Conservation Rule (2001 Roadless Rule).

Prevent Encroachment of Invasive Species

As the Draft Environmental Impact Statement (Draft EIS) states on p. 108, the no-action alternative would result in no direct increase in existing and new invasive plant species in the affected area because no project actions would occur, while alternatives 2 and 3 are likely to provide potential for activities that could increase the extent or the number of invasive plant species in the affected environment area because of the resulting soil disturbance. We agree with this assessment and support the no-action alternative with the following additional justifications.

We find it a disturbing omission that the EIS's discussion of "invasive species" focuses solely on invasive plants and neglects to mention animals and other organisms as being invasive. Executive Order 13751 defines an "invasive species" as a non-native organism whose introduction causes or is likely to cause economic or environmental harm or harm to human health, animal, or plant health (p. 106, EIS). Non-native organisms include wild and domesticated vertebrates, invertebrates, and pathogens, whether terrestrial or aquatic, many of which have caused considerable damage to forested areas. We are especially concerned that general knowledge of spread and impacts of invasive plants, animals, and pathogens has been available for decades (reviewed in Lockwood et al. 2013 and Haider et al. 2026), such that omissions from the EIS is baffling and may be considered an intentional dismissal of scientific precedence. Finally, such an omission is contradictory to USDA Directives and Priorities. Secretary Rollin's Memorandum 1078-020 identifies invasive animals and pathogens, including "New World Screwworm... Spotted Lanternfly... [and] Highly Pathogenic Avian



Influenza" as examples of "invasive pests and diseases" for which "methods for preventing, detecting, controlling, and eradicating these threats is a top priority for USDA and the security of U.S. agriculture".

Animals

The impacts are not discussed in the EIS of nonnative zebra and quagga mussels, feral pigs, feral cats, and a wide variety of other invasive animals (fishes, mammals, birds, amphibians, reptiles, insects, etc.) already invasive across the United States that number too many to mention. Many of these organisms may not be present in the remote areas now but could easily be introduced intentionally or unintentionally by allowing private vehicles and RVs, trailered boats, and logging equipment to enter on new or existing roads.

Roads function as pathways that introduce and accelerate the spread of invasive fauna into wild public lands. Wild animals tend to follow roads as easier ways to travel. For example, the spread of coyotes (native to west of the Mississippi River) into the eastern United States is attributed to the emergence of roads and bridges across rivers in the last two centuries. Additionally, many invasive amphibians and reptiles spread via hitch-hiking on vehicles (Kraus 2009); as one example, a population of an invasive lizard (Peters' Rock Agama, *Agama picticauda*) established in a remote area (Flamingo), 37.7 miles from the entrance of Everglades National Park in 2017, due to clasping onto cars along a single road (Claunch 2021). Deeper access to natural areas also provides more opportunities for intentional release of unwanted pets, a common route of establishment for invasive reptiles and amphibians (Kraus 2009) and firmly established in popular culture ("Leo" movie, Netflix, 2023).

Wherever a remote road juxtaposes a body of water suitable for launching a canoe, kayak, or other boat, aquatic organisms can be introduced into the water. Assuming the water body is connected to an aquatic network, one small introduction can increase spread farther from the road. Zebra and quagga mussels, plants like hydrilla, and other aquatic hitchhikers could spread from launched boats. However, that risk could be reduced with inspection and decontamination stations as mitigation, which are not mentioned in the EIS and may not be feasible on the remote roads.

The U.S. Forest Service is a Federal member of the Aquatic Nuisance Species Task Force (ANSTF), established by Congress with the passage of the Nonindigenous Aquatic Nuisance Prevention and Control Act in 1990 and reauthorized with the passage of the National Invasive Species Act in 1996. ANSTF works to prevent, control, and eradicate such invasive aquatic animals as zebra and quagga mussels; silver, bighead, black, and grass carps; nutria; feral hogs; rusty crayfish and others; bullfrogs; and numerous aquatic plants because of the harm they



do to natural resources of the United States. Creating a pathway for invasive aquatic organism establishment and spread is contradictory to the USFS's responsibility to the ANSTF.

Invasive insects also find easier pathways on roads when carried on vehicles or work gear. In the East, the highly invasive spotted lanternfly spread from Pennsylvania to 19 states in a few years, frequently by attaching to parked vehicles and on translocated vegetation, which then transport the insects long distances to infest new areas, devastating fruit trees, other hardwood trees, grapevines, etc. Woolly adelgids are another example of a small tree-infesting insect that can be inadvertently moved by transporting logs and attaching to mobile equipment. Western forests have also become targets of numerous harmful insects.

Pathogens

The lack of discussion of harmful pathogens is another serious omission from the EIS. Instead, only the harm that disturbance causes to beneficial mycorrhizal networks is discussed (p. 155), which is a valid point. However, so is the unintended introduction of harmful pathogens. The spread of disease-causing pathogens that can harm and even kill native organisms, including trees, is a serious problem in forests. Such pathogens include viruses, fungi, bacteria, and parasites. These organisms can become attached to vehicles and boats, logging equipment, and the clothing and gear of workers, hunters, and anglers. Pathogens are usually microscopic and thus are difficult to locate and identify. They can be carried undetected from one location to a distant one, widely spreading the invasion. Fungi, such as Dutch elm disease and chestnut blight, can be extremely deadly to plants and trees. The fatal beech leaf disease is caused by a microscopic nematode first detected in Ohio in 2012 and now covering much of the northeastern United States and eastern Canada. White pine blister rust affecting western white pines causes great losses every year.

Some fungi sicken and kill native amphibians and reptiles. The United States has the greatest diversity of salamanders in the world, but they are at great risk of mortality from the lethal fungi *Batrachochytrium dendrobatidis* and *B. salamandrivorans*. The latter is not yet known to be present in U.S. environments, largely due to the regulatory ban on importing high risk host salamander species by the U.S. Fish and Wildlife Service (USFWS 2025). If the fungi, especially the latter one, is accidentally introduced, it has the potential to cause mass mortality to newts and other salamanders across the United States, including the West. Leaving the roadless areas with "no action" would be the best way to prevent the spread to those remote areas.

Plants

Roads also function as pathways that introduce and accelerate the spread of invasive flora into wild public lands. Seeds are carried in tire treads, on transported chainsaws and other



equipment, and when the wind carries them through the open pathway of a road within a forest (Lonsdale & Lane 1994; Von der Lippe and Kowarik 2007). Logging roads specifically are known to spread invasive plants (Mortensen et al. 2009). Soil disturbance itself is enough to increase the extent or the number of invasive plant species in currently protected areas. Hardy invasive plants grow more easily in disturbed soil. Invasive plant species can outcompete ecologically important native plants as well as culturally significant native plants used for food, medicine, and Native American ceremonies.

Wildfires are obviously a serious concern in national forests. While the EIS states that “Alternative 2 and 3 would also provide opportunities to reduce fuel loads . . . reducing the potential for wildfire that could create large openings for the establishment of invasive plant species” (EIS, p. 108), the converse is also true. Some nonnative plants are particularly good fuels (D’Antonio and Vitousek 1992; Wagner and Fraterrigo 2015), such as the highly invasive cheatgrass, which also rapidly reproduces after the burn. Such invasive trees as eucalyptus and juniper have resins or oils that make the trees particularly flammable. Thus, the argument that Alternatives 2 and 3 could reduce fuel loads is not necessarily justified.

Mitigation

Mitigation for invasive species control is always an important option for resource managers. However, no mitigation actions for invasive organisms were discussed in the EIS.

In some high-traffic recreation areas in western states, federal, state, and local natural resource agencies, with the help of non-governmental organizations, have strategically placed decontamination stations along entrance roads and boat-launch areas to prevent the spread of aquatic pathogens and small aquatic plants and animals. However, it is likely that such decontamination protocols and cleaning stations will not be practical on small, remote roads, thus leading to uncontrolled spread of high-risk invasive pathogens, as well as their plant and animal hosts. Other types of mitigation for invasive fauna and flora are in common usage across the country by resource managers, but the EIS does not mention how invasive species would be contained, controlled, or otherwise mitigated.

Conclusion

Unless the EIS is revised to include the potential impacts of invasive animals and pathogens and ways to mitigate potential invasions, we can only support the no-action alternative.



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