

TO: Director, Ecosystem Management Coordination, 201 14th Street SW, Mailstop 1108,
Washington, D.C. 2025-1124

FROM: The Montana Chapter of The Wildlife Society

DATE: October 2nd, 2026

SUBJECT: Public Comment on the Recission of the Roadless Rule

The Montana Chapter of the Wildlife Society (MTTWS) appreciates the opportunity to comment on the proposed rule (90 FR 42179), the rescission of the Roadless Area Conservation Rule (“Roadless Rule”, 66 FR 3244, 36 CFR Subpart B (2001)). MTTWS was chartered in 1962 and formally organized in 1963. The Chapter is a state affiliate of The Wildlife Society (TWS). TWS is an international organization committed to addressing national and international issues that affect the current and future status of wildlife in North America and throughout the world. MTTWS membership represents a broad array of conservation professionals in the state of Montana employed by state and federal agencies, universities, nongovernmental organizations, and others.

The Roadless Rule limits road-building in intact forest habitats that are largely undisturbed by development. Since 2001, the policy has limited road-building on 58.5 million acres, while still allowing for multiple uses such as hunting, fishing, firewood cutting, camping, hiking, mountain biking, livestock grazing, off-highway vehicle riding, snowmobiling, and other activities consistent with management plans. Montana has 6.4 million acres of inventoried roadless area (IRA), roughly 37% of all Forest Service lands in the state¹.

Roadless areas provide important habitat for an abundance of Montana wildlife species and road construction has fragmenting effects on wildlife habitat. Habitat fragmentation occurs when a large expanse of habitat is transformed into a number of smaller patches of smaller total area, isolated from each other by a matrix of habitats unlike the original². Habitat fragmentation and habitat loss affect wildlife in a variety of ways. Though changes in habitat quality and composition occur naturally, human manipulation of landscapes has increasingly served as a source of habitat changes—some with overall negative effects to wildlife. When fragmentation occurs, it reduces the total area of continuous habitat and creates barriers to movement between habitats. This can negatively affect many species, particularly those with large home ranges³. By breaking up habitat into smaller parts, fragmentation increases the amount of edge, or perimeter surrounding a patch. This increased edge can change both the biotic and abiotic aspects of the interior habitat and potentially reduce habitat quality for some species⁴. Fragmentation also

¹ Drew, M. Feds take next step in removing protections from 6.4 million acres of Montana’s national forests. Daily Montanan. 28 August 2025.

² Leopold, A. 1933. Game Management. Charles Scribner’s Sons, New York.

³ Wilcove, D.S., McLellan, C.H., and Dobson A.P. 1986. Habitat fragmentation in the temperate zone. Conservation Biology, ed. ME Soule: 237-256.

⁴ Hennings, L. 2010. Wildlife corridors and permeability: A literature review. Metro Sustainability Center. Available at https://www.researchgate.net/publicat/265085554_Wildlife_corridors_and_permeability_-_a_literature_review

isolates habitat and prevents wildlife from moving back and forth between patches which can cause interbreeding, limit access to resources, and increase mortality for organisms unable to cross the non-habitat portion of land between patches⁵. A variety of Montana's wildlife species are affected by the fragmenting effects of road construction.

Secure habitat, typically defined using metrics including distance from motorized routes, minimum patch sizes, and spatial context, are known drivers of habitat use and occupancy for several wildlife species in Montana. Road construction fragments habitat which reduces secure habitat. With regards to big game species, such as the Rocky Mountain elk, security is a functional concept or condition most important when viewed in relation to the hunting season. Roads open to motorized use are consistently a strong predictor of elk distribution during the hunting season⁶. IRAs often provide valuable secure habitat refugia during these times of the year. Various other species are reliant upon large tracts of unroaded habitat, including the federally threatened grizzly bear and wolverine. Studies indicate that female grizzly bears showed greater selection for and survival in areas with a higher percentage of secure habitat^{7,8,9}. Wolverines occur in areas with lower road densities and at higher elevation, and their highest value modeled habitat frequently overlaps IRA's¹⁰. Current wolverine distribution in the contiguous United States is inversely related to human development¹¹.

The 2001 Roadless Rule indicated that one of the values in IRAs is their ability to serve as reference landscapes, places with lower human disturbance that can provide ecologists with a clear picture of what potential wildlife habitats can be. Since the implementation of the rule, the spread of noxious weeds has continued to grow as a major threat to wildlife habitat and intact native plant communities across the state. The Montana Department of Agriculture estimates that 8.2 million acres in Montana are currently impacted by noxious weeds. Noxious weed spread is well known to be associated with roads, as supported by the Forest Service's own research¹². Recission of the Roadless Rule greatly increases the likelihood of spreading noxious weeds more

⁵ Fahrig, L. 2003. Effects of habitat fragmentation on biodiversity. *Annual Review of Ecology, Evolution, and Systematics* 34: 487-515.

⁶ Proffitt, K.M., Gude, J.A., Hamlin, K.L., and Messer, M.A. 2012. Effects of hunter access and habitat security on elk habitat selection in landscapes with a public and private land mix. *The Journal of Wildlife management* 77(3): 514-524.

⁷ Schwartz, C.C., M.A. Harloldson, and G.C. White. 2010. Hazards affecting grizzly bear survival I the Greater Yellowstone Ecosystem. *Journal of Wildlife Management*. 74: 654-667.

⁸ Mace, R.D., Waller, J.S., Manley, T.L., Lyon, L.J., and Zuuring, H. 1996. Relationships among grizzly bears, roads and habitat in the Swan Mountains, Montana. *Journal of Applied Ecology*. 33(6): 1395-1404.

⁹ Gibeau, M., Herrero, S., McLellan, B., and Woods, J. 2001. Managing for grizzly bear security areas in Banff National Park and the Central Canadian Rocky Mountains. *Ursus* 12: 121-130.

¹⁰ Inman, R.M., Brock, B.L., Inman, K.H., Sartorius, S.S., Aber, B.C., Giddings, B., Cain, S.L., Orme, M.L., Fredrick, J.A., Oakleaf, B.J., Alt, K.L., Odell, E., and Chapron, G. 2013. Developing priorities for metapopulation conservation at the landscape scale: Wolverines in the Western United States. *Biological Conservation* 166: 276-286. <https://doi.org/10.1016/j.biocon.2013.07.010>

¹¹ Gerber, B. D., J. S. Ivan, P. M. Lukacs, J. C. Lewis, N. P. Kluge, C. E. Mosby, K. I. Adkins, J. A. Gude, K. A. Hersey, R. M. Inman, et al. 2026. Monitoring wolverine (*Gulo gulo*) distribution across the western United States for regional and national assessment. *Journal of Wildlife Management* e70270. <https://doi.org/10.1002/jwmg.70270>

¹² Birdsall, J.L., W. McCaughey, and J.B. Runyon. 2012. Roads impact the distribution of noxious weeds more than restoration treatments in a lodgepole pine forest in Montana, U.S.A. *Restoration Ecology*. 20(4): 517-523. <https://doi.org/10.1111/j.1526-100X.2011.00781.x>

rapidly into IRAs that often contain some of Montana's least affected wildlife habitats. MTTWS is concerned that the potential for the rescission of the Roadless Rule will result in substantial negative impacts to wildlife habitat quality in IRAs due to the spread of noxious weeds.

MTTWS challenges the assertion that the rescission of this rule will decrease susceptibility to wildfire. A vast majority of wildland fires in the United States are caused by humans¹³. Human-caused fires result from campfires left unattended, the burning of debris, equipment use and malfunctions, negligently discarded cigarettes, and intentional acts of arson. Increased road construction will increase human access to remote areas and may increase the likelihood of human-caused fires in these areas. Additionally, MTTWS recognizes the importance of natural disturbance in landscapes that evolved with fire and supports the restoration of fire to large tracts of roadless habitat where there are few human values at risk.

Further, MTTWS questions the economic feasibility of expanded road-building into IRAs. The Forest Service estimates that deferred maintenance across all asset types is approximately \$10.8 billion¹⁴, and in the Secretary's FY2026 Budget Justification the agency requested \$50 million for the construction of roads¹⁵. In Montana, some IRAs occur in steep, rocky terrain, at high elevation with short growing seasons. Building roads in remote IRA's would be incredibly costly, and adding to a National Forest road system which is already backlogged by billions of dollars of repair would add more maintenance cost. Rather, MTTWS recommends that the agency uphold its fiduciary duty to the taxpayer and address the existing deferred maintenance backlog by investing in Forest Service staff and resources.

Reducing cost of litigation was cited as a reason for the promulgation of the original 2001 Rule, and this issue has not been clearly addressed in the proposed rule rescission. Region 1 of the Forest Service (prior to the recent reorganization), which included Montana, was the most heavily litigated Region of the National Forest System. Montana and other states in the Ninth Circuit see far more legal action than other Regions; for instance, between 2003 and 2019, Region 1 had 54 forest restoration projects litigated compared to just 8 projects litigated in Region 4¹⁶. Some estimates surmise that more than half of proposed timber sale volume in Region 1 gets held up by litigation¹⁷. Many of these cases halting forest management and restoration projects in Montana center on Endangered Species Act (ESA) claims, often regarding species such as the grizzly bear, which rely on large unroaded areas for habitat. It is conceivable, if not certain, that the Roadless Rule rescission is likely result in future ESA claims brought forth in relation to grizzly bear habitat and species recovery. This could result in both long delays and

¹³ National Park Service. Wildfire Causes and Evaluations. <https://www.nps.gov/articles/wildfire-causes-and-evaluation.htm>

¹⁴ United States Department of Agriculture. 2025. FY 2025 Budget Summary. Washington, D.C., USA.

¹⁵ United States Department of Agriculture Forest Service. 2025. FY 2026 Budget Justification. Washington, D.C., USA.

¹⁶ Fretwell, H. and J. Wood. 2021. Fix America's Forests: Reforms to Restore National Forests and Tackle the Wildfire Crisis. <https://www.perc.org/2021/04/12/fix-americas-forests-reforms-to-restore-national-forests-and-tackle-the-wildfire-crisis/>.

¹⁷ Todd A Morgan, Michael J Niccolucci, Erik C Berg, Response to the Journal of Forestry Article: "US Forest Service Implementation of the National Environmental Policy Act: Fast, Variable, Rarely Litigated, and Declining", Journal of Forestry, Volume 119, Issue 6, November 2021, Pages 589–604, <https://doi.org/10.1093/jofore/fvab027>

reduced funding available to be applied for forest management on other Forest Service lands in Montana.

MTTWS recognizes that disturbance to forests creates early successional habitats that are important to many species. For example, wildfire, prescribed fire, and timber harvest all substantially increase the amount of digestible energy available in elk forage^{18, 19, 20}. Similar research is currently underway related to the effect of disturbance on the creation of early-seral habitat and food production for grizzly bears, and subsequent resource use by grizzly bears, and initial results are similar to those reported for elk. Fire management and timber harvest might be used to improve forage resources and create a habitat mosaic that benefits many species.

MTTWS, therefore, encourages members of Congress and land managers to work collaboratively with local stakeholders to develop localized strategies that balance the need for unfragmented habitat and habitat security (as provided in IRAs in Montana) with the need for fuels management and the benefits of early seral habitat created by fire and active forest management to many wildlife species. A far-reaching rescission of the Rule is the least pragmatic path towards solving legitimate user conflicts and concerns surrounding roadless area management in the National Forest System. State-specific Roadless Rules, such as those adopted in Colorado or Idaho, result from meaningful public outreach and stakeholder compromise. MTTWS would prefer to see local leaders pursue a similar solution than the “one size fits all” approach currently proposed. Other more tenable solutions could include tailored federal legislation or designations made during the Forest Planning process. These approaches would allow for greater and more meaningful public participation, and more durable solutions. MTTWS membership has substantial experience and expertise in the effects of habitat fragmentation, habitat security, and forest disturbance on myriad wildlife species, and can therefore play a supportive and helpful role in developing locally-robust and tailored solutions.

Finally, MTTWS urges the agency to engage in robust consultation and seek meaningful input from Tribes and Tribal stakeholders to achieve a just and equitable roadless policy. The Roadless Rule protects important Indigenous sites, while allowing Tribes access for traditional food gathering, conducting religious practices, and other cultural practices. It is essential those provisions remain in place.

Thank you again for the opportunity to comment, we look forward to tracking this issue as it moves through the rulemaking process.

¹⁸ Proffitt KM, Hebblewhite M, Peters W, Hupp N, Shamhart J. Linking landscape-scale differences in forage to ungulate nutritional ecology. *Ecol Appl.* 2016 Oct;26(7):2156-2174. doi: 10.1002/eap.1370.

¹⁹ Snobl, Lauren A., Kelly M. Proffitt, and Joshua J. Millspaugh. 2022. “ Wildfire Extends the Shelf Life of Elk Nutritional Resources Regardless of Fire Severity.” *Ecosphere* 13(7): e4178. <https://doi.org/10.1002/ecs2.4178>

²⁰ Weeks, Trevor C., "In The Clear: timber harvest informs elk summer nutrition and resource selection in a densely forested landscape" (2025). Graduate Student Theses, Dissertations, & Professional Papers. 12543. <https://scholarworks.umt.edu/etd/12543>