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September 19, 2025

Re: docket number FS-2025-0001 submitted via Regulations.gov portal.

Strong opposition to rescinding the 2001 Roadless Area Conservation Rule (2001 Roadless Rule) (66 FR 3244, 36 CFR Subpart B (2001)).

We are writing to submit our public comment on the Notice of Intention to rescind the 2001 Roadless Rule. We care deeply about our national forests because they are a critical part of the Wilderness and the Wildlife for which the Morongo Basin Conservation Association advocates. The following categories and reasonings describe the importance of maintaining the existing Roadless Rule:

Environmental Impacts

- The Forest Service was originally founded to protect forests and watersheds from logging and development. Scientists have since determined that roads fragment the landscape in ways that are even more ecologically harmful than clearcuts.
- Roadless areas protect habitat for **1,600 at-risk species**, safeguard clean drinking water for **60 million Americans**, and preserve old-growth forests hundreds of years old.
- The Forest Service itself stated in the text of the Roadless Rule that conserving roadless areas was critical because road construction and logging were the activities “most likely to harm” the characteristics and values the agency is tasked with protecting. That remains true today.
- The science is clear: road building fragments habitat, disrupting wildlife and watersheds; increases pollution; facilitates damaging extractive industries; and worsens the spread of invasive species.
- Recission of the roadless rule will contribute to the ‘edge effect’ of development that would degrade Wilderness areas. Wilderness areas provide habitat for species already suffering from the effects of our rapidly warming and changing climate. We must support web-of-life and preservation of species for the benefit of future generations.

Fire

- Contrary to USDA’s claim that this rescission will help the agency reduce fire risk, more roads are likely to mean more fires.

- Nearly 85% of wildfires are human-caused, and most ignite within a few hundred feet of roads. The current rule already allows road-building and logging of smaller trees to reduce fire risk and protect public safety. A full rescission is therefore unnecessary for fire safety. Given that the FY26 budget eliminates funding for wildfire suppression and management, USDA cannot claim this rule change is genuinely about mitigating fire risks.

Clean Water

- National forests provide drinking water to 60 million Americans
- Forested watersheds filter and store water more effectively than developed lands, reducing sediment and pollutants.
- Road building undermines these natural filtration systems and threatens millions of Americans' access to safe drinking water.

Intact Landscapes

- With climate change and development already fragmenting ecosystems, rescinding the Roadless Rule would jeopardize some of the last large, undeveloped tracts of land in the U.S.
- Only a small percentage of the world's ecosystems remain intact! We can't afford to abuse what little remains.

Economic Considerations

- The Forest Service manages more roads than any other federal agency yet already struggles to maintain them. The national forest system currently carries a \$10.8 billion maintenance backlog!
- The text of the Roadless Rule itself acknowledges that the Forest Service could not maintain its existing road system to safety and environmental standards. That reality has only worsened as budgets continue to shrink.
- The Forest Service's FY 26 budget slashes agency funding by more than 60%, and zeroes out funding for Wildland Fire Management, the Wildfire Suppression, Operations Reserve Fund, and State and Tribal Forestry. USDA's stated rationale for rescission '*addressing wildfire risk and giving states more decision-making power*' rings hollow when no funding is allocated to meet those goals.
- Forest revenues today come primarily from recreation, not logging. More roads would degrade recreation opportunities and undercut the agency's bottom-line.

Rescinding the Roadless Rule Contradicts Public Opinion

- When the rule was first proposed in 2001, the Roadless Rule received 1.6 million public comments—more than any rule in U.S. history at that time. Over 95% of these comments supported keeping roadless protections.
- Elected officials and Tribes, including the Confederated Tribes of Warm Springs, whose ceded lands include Mt. Hood National Forest and whose reservation still borders that forest, have voiced strong support for the Roadless Rule. The Tribes emphasized that protecting unroaded areas is essential to the health of ecosystems, fish, wildlife, and native plants.
- Polling confirms this support endures: a Pew Charitable Trusts survey found 75% of Americans support the Roadless Rule, while only 16% oppose it.
- USDA refers to itself as the 'People's Department' but rescinding the Roadless Rule directly ignores the will of the majority of Americans.

For all the reasons above, we strongly oppose rescinding the 2001 Roadless Rule. We ask that before moving forward, the agency:

- Conduct a thorough environmental analysis of roadless areas to assess the impacts of additional road building;
- Guarantee that NO watersheds will be negatively affected by rescission;
- Develop and share a detailed plan for addressing its existing backlog in road maintenance and repairs;
- And commit to moving forward with transparency, including a full account of how public comments were considered and concerns addressed.

Please protect America's remaining roadless areas for current and future generations!

Thank you for your consideration.

A handwritten signature in black ink that reads "Steve Bardwell". The signature is written in a cursive, flowing style with a long, sweeping underline.

Steve Bardwell, President
Morongo Basin Conservation Association