

September 19, 2025

Re: Docket (FS-2025-0001) Environmental Impact Statements; Availability, etc.: Special Areas; Roadless Area Conservation; National Forest System Lands

Dear Chief Schultz,

We, the undersigned groups representing millions of members, urge you not to rescind the Roadless Conservation Area Rule (Roadless Rule) but instead to keep the Rule in place to protect the wildest parts of our public forests.

The plan to rescind this rule jeopardizes nearly 45 million acres of heritage forestland managed by the U.S. Forest Service, comprising nearly a quarter of the territory in our national forest system.

Wild forests protected by Inventoried Roadless Area status provide the following benefits to the American public.

- **Vital Habitat for Imperiled Species:** The lands in question include diverse forests, wetlands, canyons and other undeveloped lands that are critical to our nation's ecological health. Because of their intact nature, these Roadless Areas provide habitat for many imperiled species such as California condors, grizzly bears and wolves in the Yellowstone area, native salmon and trout in the Pacific Northwest, migratory songbirds in the Appalachian hardwoods and more. They also sustain wild salmon in Southeast Alaska, where they are the lifeblood for both the fishing industry and traditional subsistence practices of Indigenous communities.
- **Important for Protecting Migration Corridors and Game Habitat:** Protected roadless areas help ensure that migratory game corridors for species such as elk and mule deer remain intact and protected from roads and the industrial development roads enable.
- **Vital for America's Drinking Water:** The US National Forests are the headwaters of many of our great rivers and one of the largest sources of municipal water supply in the nation, serving over [60 million people in 3,400 communities in 33 states](#). Roads are a major cause of water pollution. Because it provides significant protection for upper watersheds, the Roadless Rule is vital for maintaining clean drinking water for communities across the country. Major U.S. cities including Los Angeles, Portland, Denver and Atlanta receive a significant portion of their water supply from national forests.
- **Subsistence and Cultural Values:** These spaces are critical to food security for many indigenous communities as well as for sustaining cultural practices, including hunting, fishing, and gathering forest plants for food, medicine, and traditional arts.

- **Outdoor Recreation:** Roadless areas offer abundant outdoor recreation opportunities such as hunting, fishing, camping and other activities. Every year, millions of people take advantage of the free (or extremely affordable) access to these public lands. Roadless areas [protect](#) 11,337 climbing routes and boulder problems, more than 1,000 whitewater paddling runs, 43,826 miles of trail, and 20,298 mountain biking trails. Large sections of the Continental Divide, Pacific Crest, and Appalachian National Scenic Trails traverse protected roadless areas.
- **Climate mitigation:** Roadless areas - especially those with significant stands of mature and old-growth trees - are vital for absorbing and storing carbon, which mitigates the impacts of climate change. Among these forests, is Alaska's Tongass National Forest, the nation's largest and a global carbon sink, with its old-growth trees capturing 10 million metric tons of CO₂ every year.

Rescinding roadless area protection would undermine all of the benefits listed above as well as endanger communities and put a financial burden on communities and taxpayers.

- **Increased risk of wildfires:** Building more roads will lead to more wildfires. New [research](#) currently in peer-review that analyzed over 30 years of data shows that from 1992-2024 wildfires were four times as likely to start in areas with roads than in roadless forest tracts. Another [study](#) showed that more than 90 percent of all wildfires nationwide occurred within half a mile of a road.
- **Financial burden on communities:** An increase in logging, mining and drilling activities - along with harms caused by roads such as increased sedimentation loads or impaired culverts - can have devastating impacts to drinking water quality and fish habitat. The cost will fall on communities, who will face threats to their supply of clean water and will need to clean up polluted water before sending it to households and local economies – and will suffer from the damage to commercial and recreational fisheries.
- **Taxpayers on the Hook:** Building more roads in national forests would be a drain on taxpayers. Even with the Roadless Rule in place, the Forest Service already has a [360,000-mile road system](#) – twice as long as the nation's highway system – crisscrossing national forests. This forest road infrastructure is already so big that the Forest Service cannot afford to properly maintain it, triggering a maintenance backlog that has ballooned to billions in needed repairs. Taxpayers have subsidized this already unwieldy road network and would be stuck footing an even greater bill for any new roads built and maintained in backcountry forest areas following this rollback.

Americans have the right to explore tens of millions of acres of wild backcountry lands where there are no roads – only open land, clean water and peace of mind. Indeed, roadless areas in national forests are some of the last places in the country where that is still possible. These lands are universally enjoyed and they belong to everyone. Please protect them for the American public today and future generations.

Sincerely,

350 Bay Area Action
350 Eugene
350 Sacramento
350 Salem Oregon
350 Santa Barbara
350 Seattle
Active San Gabriel Valley
Advocates for Snake Preservation
Alaska Soles, Great Old Broads for
Wilderness
Alaska Wilderness League
American Bird Conservancy
American Hiking Society
Animal Welfare Institute
Anza Trail Foundation
Appalachian Voices
Back Country Horsemen of America
Bark for Mt Hood
Battle Creek Alliance
Beaverdam Creek Watershed Watch Group
Bird Alliance of Oregon
Bird Alliance of Southwestern New Mexico
BIRD CONSERVATION NETWORK
Birds Georgia
Black Hills Clean Water Alliance
Black Swamp Bird Observatory
Blue Mountains Biodiversity Project
Blue Ridge PRISM
Blue Ridge, Central Virginia, and Southern
Virginia Land Conservancies
California Land Watch
California State Parks Foundation
Californians for Western Wilderness
CalWild
Carbon180
Cascadia Wildlands
Catawba Riverkeeper
Catoctin Land Trust
Center for Biological Diversity
Center for Large Landscape Conservation

Center for Responsible Forestry
Central Oregon LandWatch
Central Sierra Environmental Resource
Center
Chapman Forest Foundation
Chattooga Conservancy
Chesapeake Bay Foundation
Chesapeake Wildlife Heritage
Citizens for a Safe & Clean Lake Superior
Citizens United for Responsible Energy
&Development (CURED)
Clean Air for All Now!
Clean Fairfax
Clean Water Action
CleanAIRE NC
CleanEarth4Kids.org
Climate Action California
Climate Communications Coalition
Climate First: Replacing Oil & Gas
(CFROG)
Climate Hawks Vote
Coalition for a Beautiful Los Angeles
Coalition for Sonoran Desert Protection
Coastal Carolina Riverwatch
Color My Outdoors
Colorado Mountain Club
Committees for Land, Air, Water and
Species (CLAWS)
Concerned Citizens of Cook County (GA)
Conservation Biology Institute
Conservation Colorado
Conservation Northwest
Conservatives for Responsible Stewardship
Cook Inletkeeper
CURE
Dakota Rural Action
Defenders of Highline Forest
Defenders of Wildlife
Defiance Canyon Raptor Rescue
Delaware-Otsego Audubon Society

Diné C.A.R.E.
Disabled Hikers
Dogwood Alliance
Dolores River Boating Advocates
Earth Charter Indiana
Earth Ethics, Inc.
Earthjustice
Earthjustice Action
Earthworks
Eastern PA Coalition for Abandoned Mine Reclamation
Eastern Sierra Broads
EcoFlight
Environment America
Environment California
Environment Georgia
Environment Michigan
Environment Minnesota
Environment New Mexico
Environment North Carolina
Environment Oregon
Environment Texas
Environment Washington
Environmental Defense Center
Environmental Equity Information Institute
Environmental Law & Policy Center
Environmental Protection Information Center (EPIC)
Feminist Bird Club - Asheville Chapter
Firefighters United for Safety, Ethics, and Ecology (FUSEE)
Florida Springs Council
Fort Worth Audubon Society
Frederick Stand With Palestine
Friends of Bell Smith Springs
Friends of Big Morongo Canyon Preserve
Friends of Cascade-Siskiyou National Monument
Friends of Douglas-Fir National Monument
Friends of Gold Butte
Friends of Harbors, Beaches and Parks (FHBP)
Friends of Quincy Run Watershed
Friends of the Amargosa Basin

Friends of the Boundary Waters Wilderness
Friends of the Clearwater
Friends of the Dunes
Friends of the Earth
Friends of the Inyo
Friends of the Kalmiopsis
Friends of the Nanticoke River
Friends of the Wild Swan
Friends of White's Woods
Georgia Interfaith Power and Light
Gila Resources Information Project
Glacier—Two Medicine Alliance
Global Witness
Golden Gate Bird Alliance
Grand Canyon Trust
Great Burn Conservation Alliance
Great Old Broads for Wilderness
Great Salt Lake Audubon
Greater Hells Canyon Council
Greater Yellowstone Coalition
Green Cove Defense Committee
GreenLatinos
Hawk Mountain Sanctuary Association
Healthy Environment Alliance of Utah (HEAL Utah)
Heart of the Gila
Heartwood
High Country Conservation Advocates
Hilton Pond Center for Piedmont Natural History
Humane World Action Fund
Humane World for Animals
Idaho Conservation League
Indigenous Environmental Network
Information Network for Responsible Mining
Interfaith Earthkeepers
International Bird Rescue
Izaak Walton League of America, Rapid City Chapter
Izaak Walton League Rapid City, South Dakota Chapter
Jackson Hole Conservation Alliance
John Muir Project
Kachemak Bay Conservation Society

Kalmiopsis Audubon
Kettle Range Conservation Group
Klamath Forest Alliance
KS Connectivity
KS Wild
Lakota People's Law Project
Latino Outdoors
Latinos Aventureros
League of Conservation Voters
Los Angeles Audubon Society
Los Padres ForestWatch
Loudoun Wildlife Conservancy
Lynn Canal Conservation
Lynnhaven River NOW (LRNow)
Malach Consulting
Maryland Ornithological Society
Mattawoman Watershed Society
MCAT, Mobilizing Climate Action Together
Micah Six Eight Mission
Michigan League of Conservation Voters
Mojave Desert Land Trust
Montana Environmental Information Center
Mount Shasta Bioregional Ecology Center
Mountain Mamas
Mountain Neighbors
MountainTrue
Native Movement
Native Organizers Alliance Action Fund
Natural Resources Law
Nature for All
New Hampshire Audubon
New River Land Trust
Noquisi Initiative
North American Climate, Conservation and Environment (NACCE)
North Braddock Residents For Our Future
North Cascades Conservation Council
Northeast Ohio Black Health Coalition
Northeast Oregon Ecosystems
Northeastern Minnesotans for Wilderness
Northern Plains Resource Council
Northern Virginia Bird Alliance
NRDC
Old-Growth Forest Network

Olympic Climate Action
Olympic Park Advocates
Oregon Unitarian Universalist Voices for Justice
Oregon Wild
Outward Bound Adventures (OBA)
Overmountain Victory Trail Association (OVTA)
Owen-Putnam Friends of the Forest
Pacific Northwest Trail Association
Park County Environmental Council
Partnership for Policy Integrity
Partnership for the National Trails System
Patagonia
Patagonia Area Resource Alliance
Penn Environment
Pesticide Action and Agroecology Network
Pilchuck Audubon Society (WA State)
Planning and Conservation League
Polly Dyer Seattle Broadband, Great Old Broads for Wilderness
Potomac Riverkeeper Network
Potomac Valley Audubon Society
Prairie Hills Audubon Society (of Western South Dakota)
Predator Defense
Protect Ancient Forests
Protect Our Woods
Public Employees for Environmental Responsibility
Quiet Use Coalition
Resource Renewal Institute
RESTORE: The North Woods
Revive & Restore
Rivers Without Borders
Rock Creek Alliance
Rocky Mountain Wild
San Francisco Bay Physicians for Social Responsibility
San Luis Valley Ecosystem Council
Santa Barbara Audubon Society
Santa Barbara Botanic Garden
Santa Barbara Channelkeeper
Santa Barbara Museum of Natural History

Santa Fe Forest Coalition
Santa Ynez Valley Natural History Society
Save Lake Superior Association
Save Our Cabinets
Save Our Canyons
Save Our Sky Blue Waters
Save Red Rock
Save the Scenic Santa Ritas
Schuykill Pipeline Awareness
Sequoia ForestKeeper
Sheep Mountain Alliance
Shenandoah Riverkeeper
Shenandoah Valley Bicycle Coalition
Sierra Club
Sierra Forest Legacy
Sierra Nevada Alliance
Silver Valley Community Resource Center
Sky Island Alliance
Snowlands Network
SoCal 350 Climate Action
Sociedad Ornitologica de la Hispaniola
Society for Conservation Biology North America (SCBNA)
Soda Mountain Wilderness Council
SOSVV, Inc.
South San Juan Chapter- Great Old Broads for Wilderness
South Sound Bird Alliance
South Umpqua Rural Community Partnership
Southeast Alaska Conservation Council
Southern Environmental Law Center
Southern Steelhead Coalition
Southern Utah Wilderness Alliance
SouthWings
Standing Trees
Steamboaters
Streptanthus Research Group
Student Public Interest Research Groups
Sussex County Land Trust
TCAT--Tree Action Group
Tennessee Citizens for Wilderness Planning
The Climate Center
The Clinch Coalition

The Cougar Fund
The Fire Restoration Group
The Forest Advocate
The Friends of the Stikine Society
The Norbeck Society
The North Umpqua Foundation
The Ocean Project
The Phoenix Group
The Piedmont Environmental Council
The Urban Wildlands Group
The Wilderness Society
Three Rivers Waterkeeper
Tree Action Seattle
TreePeople
Tualatin Riverkeepers
Tuleyome
Umpqua Natural Leadership Science Hub
Umpqua Watersheds
United Nations Association - California
Upper Gila Watershed Alliance
Upper Snake River Tribes Foundation
Ventana Wilderness
Vet Voice Foundation
Virginia League of Conservation Voters
Virginia Wilderness Committee
Ward 8 Woods Conservancy
Washington Trails Association
Washington Wild
Waterkeepers Chesapeake
WaterWatch of Oregon
West Louisville Dream Team, Inc
Western Alliance for Nature
Western Environmental Law Center
Western Slope Conservation Center
Western Watersheds Project
Whatcom Million Trees Project
White Mtn conservation league
Wiconi un tipi
Wild Connections
Wild Hope
Wild Nature Institute
Wild Virginia
WildEarth Guardians
Wilderness Workshop

Wildflower Grp
Willamette Riverkeeper
Williams Community Forest Project
Winter Wildlands Alliance
Wisconsin Society for Ornithology
Wolf and Wildlife Advocates
Women's Earth and Climate Action Network
(WECAN)
Wyoming Outdoor Council
Wyoming Wilderness Association
Yaak Valley Forest Council