

August 21, 2026

USDA Forest Service
Attn: Director, Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

Submitted via Regulations.gov and by email to Joshua White and roadless@usda.gov

Re: Request for Comment Period Extension and Public Meetings on Draft Environmental Impact Statement and Proposed Rule Regarding Rescission of 2001 Roadless Area Conservation Rule (Docket No. FS-2025-0001)

Dear Acting Director White,

The undersigned organizations hereby request that the U.S. Forest Service extend the period for written comment and host accessible public meetings throughout the country concerning the Draft Environmental Impact Statement (DEIS) and Proposed Rule regarding the rescission of the Roadless Area Conservation Rule (Roadless Rule). On August 20, 2026, your agency issued the DEIS and Proposed Rule and allowed the public only 32 days to submit comments on these major new actions. Such a short comment period for an environmental analysis and proposed rule of this magnitude and significance is grossly inadequate and should promptly be extended. In addition, public meetings in affected locations should promptly be scheduled.

For 25 years, the Roadless Rule has safeguarded nearly 45 million acres of America's National Forests, protecting many of our country's most valued backcountry areas and providing clean water, clean air, vital wildlife habitat, and diverse recreation opportunities, while still allowing responsible forest management. The Roadless Rule's protections should be sustained for the benefit of present and future generations of Americans. But at minimum, before deciding whether to strip away the Rule's protections, the Forest Service must provide a reasonable opportunity for meaningful public engagement on the proposed rescission.

The Forest Service's allowance of only 32 days for public comment is woefully inadequate for this purpose. In the Proposed Rule, the Forest Service has expressly solicited comments on "the baselines and ranges of impacts expected from the proposed rule ... with a description of the data and analytic methods used to determine these effects" as well as "comment and estimates on baselines and range of impacts considering subsequent potential changes in land management plans." Meaningful engagement with the DEIS and Proposed Rule requires analysis of detailed factual and scientific information that cannot reasonably be completed, compiled, and presented to the agency in only 32 days.

In addition, the 32-day comment period is starkly out of proportion with the comment process that preceded promulgation of the Roadless Rule. Before the Roadless Rule was originally adopted in 2001, the Forest Service provided a total of 129 days for the public to comment on the Notice of Intent and the Proposed Roadless Rule and held more than 400 public meetings across the country after issuing the proposed rule. And even when the Bush administration unlawfully

sought to rescind the Roadless Rule in 2005, the Forest Service ultimately offered over 120 days for public comment on the proposed rescission.

In sum, responsible and respectful management of our nation's public lands demands an immediate extension of the period for public comment on the DEIS and Proposed Rule. Accordingly, the undersigned organizations hereby request that the Forest Service extend the comment period for these actions by no less than 90 days, to December 21, 2026 or later. In addition, the Forest Service should host accessible public meetings that allow for public testimony in affected areas throughout the country, as the agency did in promulgating the Roadless Rule that it now seeks to rescind.

Please feel free to contact Aaron Bloom (abloom@earthjustice.org; 917-410-8727) if you have questions regarding this request.

Submitted on behalf of the following organizations:

Alaska Wilderness League
Center for Biological Diversity
Defenders of Wildlife
Earthjustice
Environment America
Natural Resources Defense Council
Sierra Club
Southern Environmental Law Center
Standing Trees
The Wilderness Society
Western Environmental Law Center
Wild Earth Guardians

cc:

Tom Schultz
Chris French
Bradley Kinder
Jacqueline Buchanan
Stephen Vaden