September 18, 2025

Brooke Rollins
Secretary
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Tom Schultz
Chief
U.S. Forest Service
1400 Independence Avenue, SW
Washington, DC 20250

Dear Secretary Rollins and Chief Schultz,

Thank you for your support of the USDA Forest Service's longtime engagement with the scientific community and members from academia on a variety of important issues relating to our nation's forests. We are all forest science researchers from leading academic institutions from across the country and write today to ensure that USDA and the Forest Service are aware of and considering the current scientific consensus relating to wildfire starts and inventoried roadless areas across the National Forest System (NFS). In addition to outlining the science, and given the significant implications of the proposed removal of protections for nearly 45 million acres of national forest lands, we ask for USDA's commitment to a robust and transparent dialog into the future with representatives from the scientific community as modifications to the current roadless policy are considered and potentially implemented.

As you know, national forests are the lifeblood of many rural communities and significant changes to how these lands are managed need to be carefully considered and based on sound, peer reviewed science. The NFS provides a key supply of timber for local mills and a place for residents to hunt and fish, filters drinking water supplies for millions of Americans, and drives an outdoor recreation economy that continues to grow and flourish. In recent decades, uncharacteristic wildfires have increased in size and severity and fire's continued proliferation threatens many of the important benefits that our national forests provide. In a recent opinion piece, Secretary Rollins stated that "Instead of protecting forests, it (the roadless rule) has trapped them in a cycle of neglect and devastation," suggesting that more roads will help reduce the damage from wildfires. While such an assertion may be intuitive to the casual observer, scientific data shows the

contrary - the existence of roads in forested areas is known to *increase* wildfire ignition frequency (Balch et al. 2017).

Land managers and scientists have long known that the vast majority of contemporary wildfire starts are derived from human actions such as campfires, smoking, improperly secured trailer chains, etc. and not natural causes like lightning (Jorge et al. 2025) and that these human ignitions occur in close proximity to roads more often than not. Road systems have also been linked to increased spread and cover of invasive grasses and other species which can further contribute to fire risk (Healey 2020). Indeed, a variety of peer-reviewed literature illustrates a clear positive relationship between wildfire starts and road proximity. Researchers have reached this conclusion when considering road density and fire proximity (Dickson et al. 2006, Arienti et al. 2009, Zumbrunnen et al. 2012, Zald and Dunn 2018) and the density of ignitions compared with distance to roads (Yang et al. 2006, Maingi and Henry 2007, Morrison 2007, Ricotta et al. 2018).

Additionally, fellow researchers recently undertook an examination of a nationwide dataset to determine whether roads on the national forests are associated with higher fire frequency, and they examined patterns of fire size to see whether protected areas, including roadless areas, were linked to larger fires. The researchers found that over the last three decades, across all U.S. Forest Service regions combined, wildfire-ignition density was lowest in wilderness areas (1.7 fires/1,000 hectares), followed closely by roadless areas (1.9 fires/1,000 ha). Conversely, the highest wildfire-ignition density was found on lands within 50 meters of roads (7.4 fires/1,000 ha). While still undergoing peer review, this new research appears to confirm scientists' earlier findings and shows that - in contrast to the Secretary's assertion - establishing new roads in currently unroaded areas are likely to *increase* devastation of our forests from wildfires, not reduce it. Simply put, roads equal people and people are far and away the leading ignition source for today's wildfires. Given the findings outlined above, any changes to the current roadless policy on NFS lands need to be carefully considered and weighed, because the data strongly suggests that building roads into roadless areas is likely to result in more unplanned, human-caused fires.

Relatedly, some argue that roadless rule restrictions are constraining the ability of the Forest Service to perform forest restoration and wildfire mitigation treatments. However, the Forest Service's own research appears to contradict this assertion, saying that agency "(m)anagement records also indicated that a lack of roads did not prevent fuel reduction efforts in IRAs between 2001 and 2019. IRAs (inventoried roadless areas) contain approximately 21% of the total tree cover across NFS… those areas accounted for 34% of the total fuel treatment activities and 8% of the total area treated." (Healey 2020).

In addition to this data suggesting that the roadless policy has not unduly hindered wildfire mitigation projects, federal Wildland Fire Management Policy since 2001 has recognized fire itself as a critical natural process and required that it be integrated into land and resource management plans and activities on a landscape scale. The 2009 Guidance for Implementation of this policy, issued by the National Wildfire Coordinating Group, the body governing wildfire management in the United States, reiterated this principle and directed further that "[w]ildland fire will be used to protect, maintain, and enhance resources and, as nearly as possible, be allowed to function in its natural ecological role." In practice, this has proven harder to implement than the framers of federal policy imagined. Roadless areas represent one of the few land designations where wildland fire can be safely promoted due to the low incidence of high-value assets at risk and represent a strategic as well as a tactical fire management asset.

Thank you for your consideration of the above sentiments and scientific findings. A careful examination of the available research appears to strongly suggest two key relevant points: 1) building more roads in currently unroaded areas is likely to result in more human-caused wildfire starts on national forest lands, and 2) that current roadless rule limitations are not hindering hazardous fuel reduction projects. As you move forward in the administrative process underway regarding the roadless rule, we encourage the department and the agency to consider these important findings and to schedule scientific engagement sessions with researchers and members from academia to better understand the complex causes of today's uncharacteristic wildfires. Through the thoughtful incorporation of findings, data, and scientific research into any final agency decisions; the department and the Forest Service can ensure that any new policy reforms will be based on sound science and allow our national forests to be more resilient into the future.

Sincerely,
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CC:
U.S. Senate Committee on Energy and Natural Resources
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U.S. House Committee on Agriculture