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Comments: I am writing to oppose the proposed rescission of the 2001 Roadless Area Conservation Rule (RIN 0596-AD66) and to urge the Department of Agriculture to retain the rule by selecting the No Action alternative. The Forest Service already carries a deferred maintenance backlog of roughly 6.9 billion dollars for its roads and bridges, and it is funded to maintain only about a fifth of the more than 370,000 miles of road it already manages. This rescission opens up to 18.2 million acres to new road construction the rule currently prohibits. Building more roads the agency cannot afford to maintain is fiscally reckless and shifts the long term cost onto taxpayers.

The rescission is justified as a wildfire measure, but the record does not support that. The agency's own analysis shows only about 5 percent of high hazard roadless areas have received fuels treatment since 2014, which reflects a budget and staffing shortfall, not a barrier created by the rule. The proposed rule also concedes that greater access can increase human caused ignition potential, and most wildfires on Forest Service land are started by people. Removing road protections is more likely to raise fire risk than lower it.

In 2001 the Department found that a national prohibition was the best means to protect these areas, after receiving more than a million public comments. The Department must give a reasoned explanation for reversing that longstanding position, and must account for the reliance interests built up over 25 years of protection, including those of communities, recreation businesses, Tribes, and downstream water users. The proposed rule does not adequately do so.

These areas protect 354 municipal watersheds and supply drinking water to roughly 25 million people, and they provide habitat for more than 220 species listed as threatened or endangered and 1,930 sensitive species. Roadless areas also buffer designated Wilderness, and stripping protection from the lands around Wilderness degrades those places even though the Wilderness boundaries never move. Finally, this rescission would make it far easier to route powerlines, pipelines, and water conveyance through roadless corridors by removing the road construction barrier that has kept most such infrastructure out. The Department cites Executive Order 14154 on energy as a reason for the action. The public deserves a full analysis of the industrial infrastructure this could enable, not an assurance that the effects would be modest.

For these reasons, I ask the Department to: retain the 2001 Roadless Area Conservation Rule by selecting the No Action alternative; fully analyze the fiscal, wildfire, water, wildlife, and infrastructure effects described above; and complete meaningful Tribal consultation before any decision is made.