

**U.S. House of Representatives**  
**Committee on Natural Resources**  
**Washington, DC 20515**

September 19, 2025

The Honorable Brooke Rollins  
Secretary  
U.S. Department of Agriculture  
1400 Independence Avenue, S.W.  
Washington, D.C. 20250

The Honorable Tom Schultz  
Chief  
U.S. Forest Service  
1400 Independence Avenue S.W.  
Washington, D.C. 20250

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

Dear Secretary Rollins and Chief Schultz,

The Roadless Rule provides a critical and commonsense safeguard for the nearly 60 million acres of roadless areas on National Forest System lands. I write to voice my strong opposition to its repeal, as increased logging and development of these areas jeopardize abundant outdoor recreational opportunities, clean drinking water for millions of Americans, and essential habitat for a wide range of wildlife.

On August 29, 2025, the U.S. Department of Agriculture (USDA) publicized a Notice of Intent (NOI), the first step in its formal rescission of the 2001 Roadless Rule. USDA provided just 21 days for public comment; however, typical public comment processes run anywhere from 30 to 90 days, making three weeks insufficient for members of the public to prepare adequate responses. Notably, when the original Roadless Rule was developed in 2001, the Forest Service hosted approximately 430 public meetings, collaborated with seven other federal agencies, and consulted with more than 180 Tribes and Tribal Governments. During these public comment periods, 1.6 million public comments were collected, over 95% of which were strongly supportive of protections for roadless areas. Extensive public engagement should inform a consequential decision that impacts nearly 60 million acres of our national forests, and I urge you to extend the comment period to a full 45 days for public comment and 120 days for Tribal consultation.

California has more national forest acreage than any other state in the lower 48,<sup>1</sup> and within California, around 4 million acres are protected under the Roadless Rule.<sup>2</sup> In California's Second Congressional District, rescinding the Roadless Rule would remove critical environmental protection for hundreds of thousands of acres in the Shasta-Trinity National Forest, the Mendocino National Forest, and the Six Rivers National Forest. In the Six Rivers National Forest alone, 150,000 acres of Inventoried Roadless Areas (IRAs) would be at risk of development.<sup>3</sup> About 1.4 trillion gallons of water per year come from the Six Rivers National Forest, providing clean water to communities, homes, and wildland habitats with an estimated wholesale market value of over \$428 million. Over 165,000 people visit Six Rivers National Forest to recreate annually, spending about \$7.8 million during their trips and contributing more than \$2.4

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<sup>1</sup> Congressional Research Service, *Forest Service Inventoried Roadless Areas (IRAs)*, August 28, 2020. <https://www.congress.gov/crs-product/R46504>

<sup>2</sup> U.S. Forest Service, Map of Inventoried Roadless Areas on National Forest System Lands. <https://www.fs.usda.gov/sites/default/files/roadless-map-california-high-resolution-fsmrs-072344.pdf>

<sup>3</sup> Lost Coast Outpost, "150,000 Acres of Six Rivers National Forest Wilderness Could Lose Protection if Trump Administration Rescinds Roadless Rule," (August 2025), <https://lostcoastoutpost.com/2025/aug/29/roadless-rule/>

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million towards the wages and income of local businesses.<sup>4</sup> Logging and development in these areas threaten the clean water and recreational opportunities that drive rural economies and sustain healthy communities in my district. Additionally, 154,332 acres of IRAs would lose protection in the Mendocino National Forest, including nearly 30,000 acres within the Berryessa Snow Mountain National Monument.<sup>5</sup> Given the importance of these areas, prominent local environment groups like CalWild, the Environmental Protection Information Center, and Tuleyome have joined to condemn the Administration's actions.

Stakeholders throughout California understand the importance of the Roadless Rule. In California alone, National Forests make up 20% of the state and supply 50% of the runoff for drinking water.<sup>6</sup> Roadless areas provide key sources of clean drinking water for communities. According to the Forest Service's own preamble issued as a part of the original rule's promulgation, "Although the inventoried roadless areas comprise only 2% of the land base in the continental United States, they are found within 661 of the over 2,000 major watersheds in the nation."<sup>7</sup> National Forest System lands also save downstream communities millions of dollars in water filtration costs. Repealing the Roadless Rule risks the loss of clean water for millions—an especially misguided move as the West faces continued megadrought and water crises.

The intact ecosystems found in roadless areas are also working landscapes that sustain critical fish and wildlife habitat<sup>8</sup> and riparian areas,<sup>9</sup> fueling local economies with tourism, fishing, and recreation. In fact, 70% of the public land within roadless areas is home to native trout or salmon, including cutthroat trout in the Rockies, brook trout in Appalachia, and salmon and steelhead in the Pacific Northwest and Alaska.<sup>10</sup> Repealing the Roadless Rule would put these critical watersheds at risk of degradation from erosion, sedimentation, and contamination, compromising the local communities that depend on healthy roadless ecosystems for the health of their economies or for foraging and subsistence rights of Tribal Nations.

Supporters of rescinding the Roadless Rule argue that it is a barrier to active forest management and wildfire prevention.<sup>11</sup> This is not accurate. The Roadless Rule has allowances for fuels management and timber harvest under certain circumstances, including to reduce fuel loads in the wildland-urban interface and to improve habitat for threatened, endangered, or sensitive species. In fact, the Forest Service's own research shows that roadless areas have historically received a larger proportion of fuels management projects than other areas of the National Forest System.<sup>12</sup> Additional research shows that fire ignitions are more likely to

<sup>4</sup> U.S. Forest Service, "Nature's Benefits Six Rivers National Forest in California," (August 2020), <https://www.fs.usda.gov/emc/economics/documents/at-a-glance/benefits-to-people/pacificsw/BTP-SixRivers.pdf>

<sup>5</sup> Tuleyome, "Final Days to Comment on Roadless Rule Rollback," (September 2025), <https://api.neonemails.com/emails/content/8m9re1JSX0UB7NEIUSkjWIVWzrjieHrjgi8vZO4pZCQ=>

<sup>6</sup> Geos Institute, *National Forest Roadless Areas and Clean Water*: July 2011. [https://geosinstitute.org/wp-content/uploads/2010/08/FINAL\\_Clean\\_Water\\_report\\_6.30.11.pdf](https://geosinstitute.org/wp-content/uploads/2010/08/FINAL_Clean_Water_report_6.30.11.pdf)

<sup>7</sup> FEIS Vol. 1, 3-50.

<sup>8</sup> Matthew S. Dietz, Kevin Barnett, R. Travis Belote, Gregory H. Aplet, *The importance of U.S. national forest roadless areas for vulnerable wildlife species*, Global Ecology and Conservation. December 2021. <https://doi.org/10.1016/j.gecco.2021.e01943>

<sup>9</sup> McKinley J. Talty, Kelly Mott Lacroix, Gregory H. Aplet, R. Travis Belote, *Conservation value of national forest roadless areas*, Conservation Science and Practice, September 2020. <https://doi.org/10.1111/csp2.288>

<sup>10</sup> Trout Unlimited, "Roadless is more," (August 2025), <https://www.tu.org/magazine/conservation/roadless-is-more/>

<sup>11</sup> U.S. Forest Service Chief Schultz, "It's time for common-sense roadless reform," (June 24, 2025), <https://www.fs.usda.gov/inside-fs/leadership/its-time-common-sense-roadless-reform>

<sup>12</sup> Sean P. Healy, *Long-term forest health implications of roadlessness*, Environmental Research Letters. September 2020. <https://doi.org/10.1088/1748-9326/aba031>

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occur near roads than in the backcountry. A recent report examining all fire ignitions across the country on national forest lands from 1992 to 2024 found that ignitions are far more likely to occur near roads and are far less likely in roadless and wilderness areas.<sup>13</sup> Notably, the original Roadless Rule also allows road construction for wildfire response. Claims that repealing the Roadless Rule would improve forest management or community safety clearly ignore the evidence and would only serve to increase wildfire risk.

Roads are also expensive to maintain and a drain on taxpayer resources. The nearly 370,000 miles of Forest Service roads that cross the national forests have resulted in a \$4.85 billion backlog of road maintenance.<sup>14</sup> This fiscal irresponsibility will only continue with increased logging and development in the 45 million acres at risk if the Roadless Rule is rescinded. Instead, the Administration should prioritize preserving and maintaining existing roadless areas to provide outstanding dispersed recreation opportunities such as hiking, cross-country skiing, mountain biking, hunting, and fishing, which contribute to a \$1.2 trillion outdoor economy. Rescinding the Roadless Rule would roll back protections on 25,121 miles of trails, 8,659 climbing routes, 768 miles of whitewater, and 10,794 miles of mountain biking—risking continued access to treasured recreation areas across the nation.<sup>15</sup>

For over two decades, the Roadless Rule has protected 58 million acres of high-quality and unfragmented National Forest System lands, ending decades of unsustainable road building and spiraling maintenance costs while still permitting fuels treatment, fishing, hunting, OHV use, mining, grazing, oil and gas leasing, and timber projects to improve forest health and prevent wildfire. Repealing the Rule would be a profound mistake, locking in a future of increasingly severe wildfires, fiscal irresponsibility, and water scarcity. I urge you to abandon this reckless course and uphold the Roadless Rule's protections.

Sincerely,



Jared Huffman  
Ranking Member  
House Committee on Natural Resources

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<sup>13</sup> The Wilderness Society, *Three-decade record of contiguous-U.S. national forest wildfires indicates increased density of ignitions near roads*. June 2025. <https://earthjustice.org/wp-content/uploads/2025/06/updated-summary-roads-and-fire-.pdf>

<sup>14</sup> GAO, *Deferred Maintenance: Agencies Generally Followed Leading Practices in Selections but Faced Challenges*. January 2024. <https://www.gao.gov/assets/870/865801.pdf>

<sup>15</sup> Outdoor Alliance, *Defend America's backcountry forests*. <https://www.outdooralliance.org/roadless>