

Date: September 19, 2025

U.S. Department of Agriculture
Director, Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

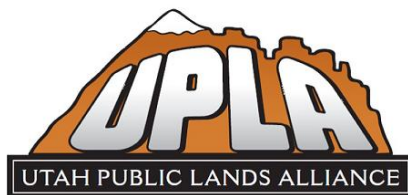
Via Submission on Regulations.gov: <https://www.regulations.gov/document/FS-2025-0001-0001>

RE: Special Areas; Roadless Area Conservation; National Forest System Lands (Docket ID FS-2025-0001-0001)

Dear USDA Roadless Conservation Rule Planning Team,

Utah Public Lands Alliance (UPLA) is writing to provide public comment on the US Department of Agriculture, US Forest Service [proposed rule to rescind the 2001 Roadless Area Conservation Rule \(2001 Roadless Rule\) \(66 FR 3244, 36 CFR Subpart B \(2001\)\)](#)¹, hereto forward referred to as “Rule.” The entirety of our membership live near and/or recreate throughout the 8.2 million acres of public land that is managed by the U.S. Forest Service (USFS) in Utah, as well as USFS-managed public lands throughout the rest of the USA. Our members are directly impacted by the framework of 2001 Roadless Conservation Rule which prohibits road construction, road reconstruction, and timber harvesting in 4 million acres of Utah’s inventoried roadless areas, with limited exceptions. Thus, our members are among the hundreds of millions of people who will be impacted by the outcome of this Rule. This letter of comment shall not supersede the rights of other UPLA agents, representatives, or members from submitting their own comments; the USFS should consider and appropriately respond to all comments received for the Rule.

UPLA is a non-profit organization representing over 5,800 members, in addition to speaking out for 69 OHV clubs and organizations. We advocate for responsible outdoor recreation, active stewardship of public lands, and encourage members to exercise a strong conservation ethic including “leave no trace” principles. We champion scrupulous use of public lands for the benefit of the general public and all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively with public land managers, all recreationists, and other public land stakeholders. Our members participate in outdoor recreation of all forms to enjoy federally and state managed lands throughout Utah, including USFS managed public lands. UPLA members visit public lands to participate in motorized and human-powered activities such as off-roading, camping, hiking, canyoneering, horseback riding, sightseeing, photography, wildlife and nature study, observing



cultural resources, and other similar pursuits on a frequent and regular basis throughout every season of the year. UPLA members and supporters have concrete, definite, and immediate plans to continue such activities in USFS-managed public lands throughout Utah and the USA for the indefinite foreseeable future.

I, Rose Winn, am an avid outdoor recreation enthusiast and anthropologist; hiking, backpacking, backcountry horseback riding, camping, rock climbing, off-roading, fishing, forage of wild herbs and plants for medicinal uses, and exploration of cultural and archeological sites and artifacts on public lands are among my core areas of activity and interest. I serve as the Natural Resources Consultant for Utah Public Lands Alliance (UPLA), a non-profit organization dedicated to keeping offroad trails open for all recreation users. While my profession allows me to advocate to protect public access to public lands for all stakeholders and multiple-uses, I also work as a volunteer on conservation, mitigation, and restoration projects on public lands.

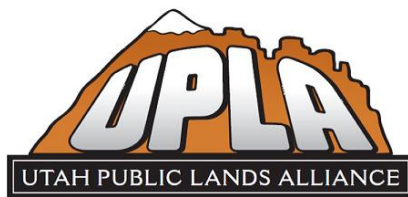
As a joint writer of this comment letter, Loren Campbell is a Jeep and UTV enthusiast from Virgin, Utah. Loren serves as the President of Utah Public Lands Alliance (UPLA). We share a strong interest in maximizing opportunities for offroad motorized recreation. Loren works full time as a volunteer advocate to protect access for all users, and also organizes and works as a volunteer on projects on public lands. UPLA, Loren, and I are also members of BlueRibbon Coalition. These comments are submitted on behalf of both myself and Loren Campbell, as well as our members and followers from within and outside of Utah.

Please note our support and agreement with the comments submitted by BlueRibbon Coalition.



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GENERAL COMMENTS

UPLA recognizes the positive mental, spiritual, physical, and social benefits that can be achieved through outdoor recreation. We also recognize that outdoor recreation provides business owners and local communities with significant financial stimulus. Of foremost importance to our motivations for this comment letter: our members are directly affected by management decisions concerning land use in USFS-managed public lands, including and especially, decisions that impact the scope and implementation of the multiple-use mandate, and related balance of public access and outdoor recreation with conservation of natural and cultural resources.

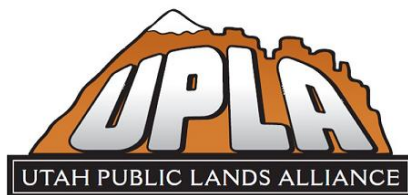
Our members subscribe to the tenets of:

- Public access to public lands now, and for all future generations
- Active stewardship for the benefit of all US citizens who collectively own our public lands as part of our national endowment
- Effective management of public lands to ensure the safety of all who enjoy them
- Conservation of ecological, cultural, and archeological resources in balance with implementation of the Congressional mandate for multiple-use public land management

UPLA members as well as the general public desire access to public lands now and in the infinite foreseeable future. Restricting access today deprives the public of the opportunity to enjoy the many natural wonders of public lands. UPLA members and the general public are deeply concerned about the condition of the environment and public safety. They desire safe means to access public lands to engage in conservation efforts as well as outdoor recreation. UPLA supports the concept of managed recreation and believes it is prudent to identify areas where both motorized and non-motorized use is appropriate.

The [USFS administers 193 million acres of public land in the United States](#)², including 8.2 million acres within Utah, representing 15% of the total land mass in this state. Utah's public lands offer a primary source for the public to enjoy outdoor recreation, as is the case in all states across the USA. Reduction or elimination of public access to USFS managed land thus bears the potential to increase user conflicts and resource damage by removing sufficient access to public lands for all forms of outdoor recreation.

As the USFS is considering critical issues to inform rescission of the Roadless Rule, we are concerned about the risk that the Roadless Rule may remain intact, as it is a significant mechanism that restricts public access and multiple-use management of 45 million acres of public land in the USA. We frame this comment letter with a reminder that it is the USFS's Congressionally-directed responsibility to develop rules and plan alternatives that serve to



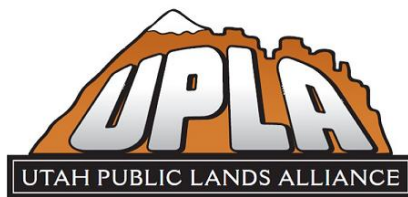
maximize the multiple-use directive, and place recreational values in equal status for optimization as all other public land values. Regulatory changes that function to close or restrict motorized, recreational, and other public access negatively impact UPLA members, as well as all members of the general public who enjoy outdoor recreation on USFS managed lands, by significantly minimizing their ability to access public land. In accord with legal and procedural dictates, the proposed rescission of the Roadless Rule must align with Congressional directives.

As Congressionally-designated managers, it is the responsibility of the USFS to optimize management protocol to balance conservation of natural and cultural resources with public access and enjoyment of public lands. By the letter and spirit of the law, it is neither necessary nor prudent to restrict or eliminate public access to USFS-managed public lands as a primary management tool; to do so, when alternative mechanisms for management that would effectively balance conservation with public access are readily available, is both arbitrary and capricious.

While evaluating the proposed Rule the USFS is legally and procedurally compelled to address the following plan components:

1. Local forest planning supersedes broad national prescriptions in quality and relevance
2. Congressional direction, Congressional intent, and federal agency operational guidelines
3. Rescission will materially decrease the intensity and rapid spread of wildfires
4. Rebutting the “roads cause most fires” claim
5. OHV & outdoor recreation: positive drivers of forest health
6. Refuting “budget constraints” as justification for the roadless rule

In summary reference to the items noted above, with additional detail for each following within this comment letter, we support any additional comments from individuals, groups, associations, and the general public that encourage the USDA to adhere to the Congressionally-mandated directive that requires protection of public access and management that is centered on the multiple-use directive as core values for USFS public land management. We support any additional comments that encourage the USDA to uphold their mission and commitment to the public to manage public lands in a manner that maximizes public access, and sustains the health, diversity, cultural resources, and values of the land for the use and enjoyment of present and future generations. We strongly advocate against any components of the Rule that would diminish or eliminate public access to public lands.

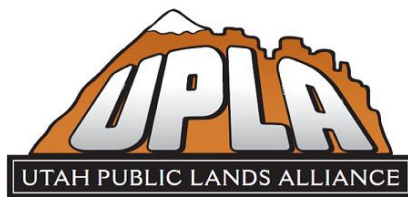


LOCAL FOREST PLANNING SUPERCEDES BROAD NATIONAL PRESCRIPTIONS IN QUALITY AND RELEVANCE

The proposed rescission would remove the Roadless Rule’s nationwide prohibitions on (1) road construction/reconstruction and (2) timber harvest in inventoried roadless areas, and would return those decisions to local Forest Service officials and forest-level planning (while excluding the Tongass and state-specific rules for Idaho and Colorado). Rescission of the Rule will serve to increase public and OHV access, and improve local management flexibility. Opponents of rescission claim that repealing the Rule will produce substantive risks for habitat fragmentation, water quality, and increased human-caused wildfire ignitions near roads. However, the impacts of rescission depend entirely on how forest-level plans and project-level NEPA decisions balance access and conservation; all forest-level and project-level planning are rigorously facilitated within the constraints of existing laws and management policy that require conservation of natural resources as primary criteria for project approval and implementation. Therefore, we emphasize the fact that rescission of the Roadless Rule does not inherently compromise the protection of flora, fauna, or the habitats they occupy. Rather, those protections remain wholly intact. Furthermore, those protections are enhanced by restoring local-level planning for 45 million acres of our national forests. Locally centered planning improves depth, quality, and relevance of analysis for environmental, human, cultural, economic, and social factors.

We strongly support the Forest Service’s stated goal of returning road and vegetation decisions to forest-level planning and local managers. The experience of the [Monroe Mountain Aspen Ecosystem Restoration Project on the Fishlake National Forest](#)³ demonstrates how locally driven planning provides the depth and relevance necessary to balance ecological, cultural, and community values. On Monroe Mountain, land managers, local counties, livestock permittees, and state and tribal partners collaborated to design a landscape-scale restoration strategy that spans over 50,000 acres of aspen habitat. This project integrates mechanical thinning, prescribed fire, and targeted conifer removal to restore declining aspen stands, improve watershed health, reduce hazardous fuels, and enhance wildlife habitat, while maintaining grazing, recreation, and scenic values. The project’s phased design, rooted in site-specific analysis and stakeholder engagement, ensures that treatments address unique ecological conditions of the mountain while supporting local economies and community safety. This kind of integration—protecting municipal water supplies, sustaining hunting and recreation opportunities, and reducing wildfire risk—is only possible when planning authority rests with local forests and their partners, rather than being constrained by broad national prohibitions such as the Roadless Rule.

The scientific literature and agency experience further support the principle that place-based, locally designed active management yields superior ecological and social outcomes. Research

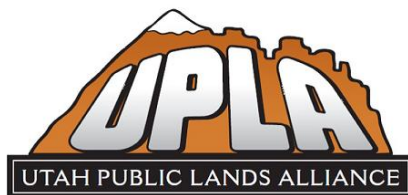


synthesizing decades of western U.S. work shows that strategic mechanical thinning, followed where appropriate by prescribed fire or managed wildfire, reduces canopy bulk density and ladder fuels, moderates potential crown-fire behavior for decades, and increases resilience across mixed-conifer and ponderosa pine landscapes when treatments are targeted at the landscape scale and coordinated with local conditions. North et al.⁴ note that mechanical treatments can establish the fuel-reduced “anchors” necessary to make prescribed and managed fire effective and scalable; Stephens and colleagues document how returning more historical forest structure and heterogeneity through active treatments supports forest resilience; and multiple recent reviews and field studies show that [a mix of mechanical and fire treatments - designed and sited at the forest/landscape level - produce the best outcomes for reducing extreme wildfire behavior and protecting values at risk](#)⁴.

Legal and policy precedent also supports returning substantive authority to forest-level planning. The National Forest Management Act (NFMA) charges the Forest Service with developing and implementing forest plans that balance timber, recreation, watershed protection, wildlife habitat, and other multiple-use objectives on a local, landscape basis; the Forest Service Planning Rule (36 C.F.R. Part 219) implements NFMA by requiring science-based, public-engaged, plan-level analyses that identify desired conditions, management approaches, and monitoring for each national forest. Likewise, NEPA requires site-specific environmental analysis for projects, which is where real tradeoffs can be evaluated and mitigations tailored to local ecological, cultural, and social contexts. These authorities — NFMA, the Planning Rule, and NEPA — together create a legal architecture that is intentionally place-based and that is better suited than a broad nationwide prohibition (such as the Roadless Rule) to address the diversity of ecosystems, communities, and values present across our National Forest System. (See 16 U.S.C. § 1600 et seq.; 36 C.F.R. § 219; NEPA statutes and regulations.)

Putting these authorities into practice at the forest level yields measurable benefits for the full set of values that the USFS is responsible to protect and promote. For example, [SERAL's](#)⁵ planning explicitly protects municipal and rural water supplies, historic infrastructure, and tribal resources while authorizing treatments that reduce fire risk to foothill communities - outcomes that cannot be adequately prioritized or implemented by a single national prohibition. In short, local planning improves depth (detailed local inventories and socioeconomic analysis), quality (site-specific prescriptions and adaptive monitoring), and relevance (direct linkage to community values, tribal concerns, and local economies). **The USFS should therefore make clear in its EIS and final action for this Rule that:**

- 1. Rescission of the Roadless Rule is intended to restore forest-level discretion under NFMA and the Planning Rule,**



2. **Forest plans and project NEPA will be the primary mechanisms through which road, access, and vegetation decisions are evaluated and implemented, and**
3. **The EIS must require and identify the funding, staffing, and monitoring needed to ensure that locally authorized actions achieve intended ecological and social outcomes without unacceptable collateral impacts to water quality, listed species, or cultural resources.**

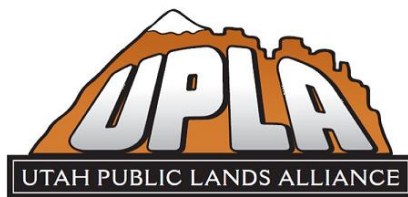
Finally, to ensure that locally centered decisions produce durable environmental and social benefits, **we urge the Forest Service to adopt the following commitments in the EIS and the final rule:**

- **Explicitly defer to and operationalize NFMA/36 C.F.R. Part 219 forest plans as the principal mechanism for balancing multiple uses;**
- **Identify funding sources and partnership mechanisms (shared stewardship, master stewardship agreements, TFPA arrangements, and grant programs) to guarantee implementation and long-term maintenance of treatments and roads; and**
- **Commit to baseline and post-implementation monitoring (ecological, hydrologic, cultural) and public reporting so that outcomes are transparent and adaptive management is possible.**

These measures will make the transition from a national prohibition to forest-level authority a meaningful improvement in stewardship - one that produces better protection for natural resources while restoring local control to address community safety, public access, well-balanced recreation and multiple-use opportunities, and resilient forest economies.

CONGRESSIONAL DIRECTION, CONGRESSIONAL INTENT, & USFS OPERATIONAL GUIDELINES

The USFS manages public lands under jurisdiction granted by the United States Congress, in accord with the [Federal Land Policy and Management Act](#)⁶ (FLPMA). The USFS is a contracted public land manager, with direct accountability to the citizens of the United States for the method and outcomes of their management actions. The USFS does not possess ownership of the public lands they are privileged to manage through Congressional directive. Neither does the USFS possess sole discretion to exercise management authority that excludes the vested interests of the full citizenship of the USA. As elected leaders, the US Congress is the only entity which may direct the USFS's management protocol. US citizens are protected from the risk of USFS overreach in management authority by the functions of congressional process, FLPMA, NEPA, as well as the broader framework of the US Constitution.



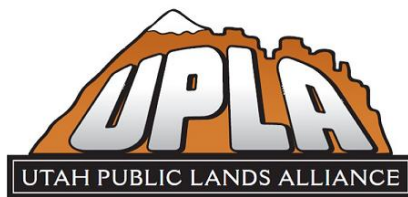
Since its inception as a federal agency, the USFS has been explicitly, and very clearly, directed to manage public lands per the multiple-use mandate. The US Forest Service is mandated to manage National Forest System lands in accordance with the [Multiple-Use Sustained-Yield Act of 1960](#)⁷ (MUSYA). This act requires the Forest Service to manage these lands for a variety of uses, including timber, range, water, recreation, and wildlife, in a way that ensures a continuous flow of resources and services to the nation.

The MUSYA, specifically codified in 16 U.S.C. 528-531, directs the Secretary of Agriculture to administer renewable resources within national forests for multiple use and sustained yield. This means the agency must balance various resource uses, ensuring their availability for current and future generations.

The Forest Service's land management planning, guided by the MUSYA, is codified in 36 CFR Part 219. This regulation outlines the process for developing and revising land management plans, ensuring they comply with the multiple-use mandate. Per the definition of multiple use within [U.S. Code § 1702 Title 43](#)⁸, the term “multiple use” means:

*“The management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, **recreation**, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output.”*

Since implementation of the Roadless Rule, it has been obstructive and prevented active management of our National Forests in achieving this multiple use mandate. When drafting the Rule, it is critical that rescission of the Roadless Rule must serve to support and advance the purpose and implementation of the multiple-use mandate on USFS managed public lands. As set forth in law, the USFS’s mission and congressional management directive is to achieve quality land management under the sustainable yield multiple-use management concept to meet the diverse needs of the people of the United States. The USFS’s operational guidelines clearly state that the foundational framework for all management action is to uphold and expand the multiple-use objective, manage public lands for the benefit of the people (all citizens of the USA), to



maintain transparency and accountability in all decisions and actions, to execute decisions in a way that is fair to the public, and most importantly – to follow the law and congressional intent.

Since its inception in 2014, UPLA has been an active, responsible partner of the USFS, with members continually engaged in volunteer service to advance conservation, trail and landscape maintenance, public education, public safety, and cooperative public land management. UPLA members have a longstanding history of visiting USFS managed lands as individuals, groups, and for organized outdoor recreation events. Casual use and organized events like ours bring public land visitors to public lands in an orderly and controlled manner. This ensures conservation of the landscape and wildlife habitat, while preventing overcrowding and user conflict. Our events and membership doctrines promote land use ethics, responsible camping, respect for natural resources, and public safety. It is critical that the USFS move forward to approve rescission of the Roadless Rule in order to eliminate a legally unjustified obstruction to the membership of UPLA, as well as all members of the general public, from accessing USFS-managed public lands for organized, safe, conservation-centric recreation.

Retaining the Roadless Rule as intact will perpetuate elimination of public access and failure to adhere to the multiple-use objective would be a violation of Congressional direction and Congressional intent for the scope of limitations by which the USFS is authorized to manage our public lands. It is critical for the Roadless Rule planning managers to bear in mind that the USFS does not own our public lands. USFS managed lands are a part of the public endowment, as all public lands are owned by the citizens of the USA (the public); the USFS is merely contracted to manage those lands within the defined scope of limited authority that is granted by Congress. **The Rule must demonstrate that the USFS is not overstepping Congressional direction and Congressional intent such that the best interests and needs of the public would be overrun through restriction or elimination of public access to USFS-managed public lands, nor restriction or elimination of public involvement in all facets of public land management planning.**

RESCISSION WILL MATERIALLY IMPROVE CATASTROPHIC WILDFIRE PREVENTION AND PROVIDE CRITICAL GROUND ACCESS FOR FIREFIGHTERS

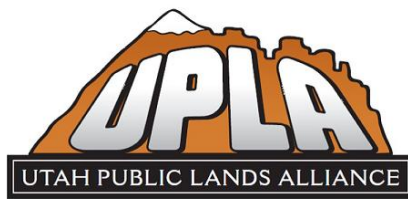
One of the biggest threats to the health and resilience of our beautiful national forests, and all of the multiple-use values contained within them, is catastrophic wildfire. Wildfire of this type decimates the landscape, incinerating full forests and every form of life that resides in it. We thus urge the Forest Service to adopt the proposed rescission - returning road and vegetation decisions to forest-level planning will materially improve our ability to prevent catastrophic wildfires and to mount effective ground-based suppression when fires occur – this is desperately



needed throughout the 4 million acres of Utah's public land that has been severely restricted to access and responsible stewardship by the Roadless Rule. The scientific literature is clear that strategically sited mechanical thinning, followed where appropriate by prescribed burning or managed wildfire, reduces canopy bulk density and ladder fuels and thereby lowers the probability of extreme crown-fire behavior within treated areas. Meta-analyses and synthesis reviews (North et al⁴; [Stephens et al⁹](#); [Brodie et al¹⁰](#); and [recent meta-analyses of thinning and prescribed fire¹¹](#)) conclude that combined mechanical and fire treatments consistently reduce fire severity within treated footprints and create defensible landscape anchors that enable safe and effective fire operations.

Treatments of the kind described above nearly always require timely and predictable ground access for crews, engines, equipment, and for the establishment and maintenance of fuel breaks and safe tactics during active incidents. While the Roadless Rule includes narrow exceptions for emergency suppression, it functionally constrains the proactive road and landing construction, maintenance, and mechanical treatment projects that forest managers increasingly identify as necessary to protect communities and values at risk. USDA statements and industry commenters emphasize that rescission would remove top-level prohibitions and allow managers to site access and treatment projects where they will do the most good - protecting life and property while enabling landscape-scale resilience.

Post-fire analyses and contemporary incident reporting from major Utah wildfires illustrate the tactical imperative for ground access. The [2018 Pole Creek and Bald Mountain Fires¹²](#) (Uinta-Wasatch-Cache National Forest) ignited in rugged terrain under critical wind events and low humidity; forest-level incident reviews and a Facilitated Learning Analysis noted that steep slopes, limited road access, and complex fuel structure constrained early direct ground attack. Suppression efforts initially depended heavily on aerial resources, and only once dozer lines and ground access could be established did crews make meaningful containment progress - it was at that stage that the fires threatened communities such as Elk Ridge and Woodland Hills. These access limitations greatly increased the duration of the fires, the area burned, smoke exposure, and risk to wildlife and habitat. Similarly, the Twitchell Canyon Fire (2010) in Fishlake National Forest burned over 30,000 acres; published [burn-severity mapping and watershed studies indicate that delayed ground access allowed fire to escape early smaller control opportunities¹³](#), with [consequences for habitat \(including fisheries\) and downstream water quality¹⁴](#). Restoring ability to plan and build access for fuels reduction and tactical response will increase the probability of successful initial attack and reduce the chance that ignitions escalate into landscape-scale catastrophes.



Federal law and Forest Service policy support this locally focused approach to fuels reduction and firefighter safety. The National Forest Management Act (NFMA) requires forest plans that balance multiple uses and adopt site-specific standards and guidelines; the Forest Service Planning Rule (36 C.F.R. Part 219) and the Agency's fire and aviation management guidance direct managers to integrate fire as a landscape process and to provide for firefighter and public safety. Interagency operational standards ([the Red Book / Interagency Standards for Fire and Fire Aviation Operations](#)¹⁵) and the Forest Service's own fire-management handbooks emphasize safe, effective ground operations and the need for infrastructure and treatments that enable those operations. Returning road and fuels decisions to forest plans (where NEPA, NFMA, ESA, and CWA protections remain in force) enables the design of targeted access and fuel-treatment networks that are tailored to local topography, community values, and ecological conditions, and that therefore maximize the public-safety benefits of active stewardship.

When combined with scientifically supported mechanical and fire treatments, carefully designed and managed access produces a clear net benefit to human safety, firefighter effectiveness, wildlife, and habitat by enabling timely suppression, reducing extreme fire behavior, and shortening incident duration. **The EIS should therefore embrace alternatives that restore forest-level authority to implement targeted access and fuel-reduction projects while specifying the mitigation, monitoring, and enforcement measures needed to ensure advancement of the multiple-use management mandate and enhanced public access, balanced with effective stewardship of the land and resources.**

For these reasons, rescission of the Roadless Rule - paired with rigorous NEPA analysis, NFMA-consistent forest planning, and enforceable mitigation and monitoring commitments - will allow the Forest Service to carry out the active, place-based treatments that the scientific literature clearly identifies as most effective for reducing catastrophic wildfire risk, and will provide the critical ground access firefighters need to protect lives, communities, and the landscapes we all treasure and rely upon.

REBUTTING THE "ROADS CAUSE MOST FIRES" CLAIM

Since Secretary Rollins' announcement of the USFS proposal to rescind the Roadless Rule, there has been a substantial outcry among Roadless Rule proponents, claiming that more roads = more fires. It is thus important to correct this key factual error repeated in public debate over this rule: the assertion that *most* wildfires are started immediately adjacent to roads and that therefore more roads necessarily cause more catastrophic fires. That claim is often advanced by citing a recent [NGO analysis](#)¹⁶ that reports higher ignition densities within short buffers of roads. But this analysis was published by The Wilderness Society, which has the stated purpose of protecting

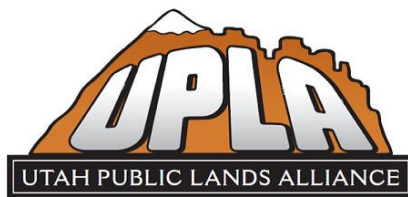


and expanding Wilderness areas. They are clearly biased in any of their reporting to achieve this goal. Further, it is not a peer-reviewed study or does it even cite the author or their credentials. Critically – it relies on raw ignition counts and simple proximity metrics without adequately accounting for known confounding factors (population density, land-use patterns, the wildland-urban interface, seasonal visitation patterns, or the strong distinction between *ignition counts* and *area burned*). As several technical critiques and public rebuttals have noted, using ignition density alone to infer a causal policy conclusion about road building is misleading.

The scientific literature shows the picture is more nuanced. Multiple peer-reviewed studies demonstrate that human-caused ignitions are indeed more likely in places with higher human presence and infrastructure (which often, but not exclusively, correlate with roads), yet ignition probability is not the same as ignition consequence (how large and severe a fire becomes). Lightning ignitions - though sometimes fewer in number - often occur in remote, unroaded terrain and are disproportionately responsible for large area burned under extreme weather conditions. Humans may alter ignition patterns, seasonality, and spatial extent, but they do not justify the simplistic policy claim that any new or well-managed road will necessarily increase catastrophic fires. Good science requires accounting for differences between (a) where fires start, (b) how quickly they are suppressed, and (c) the conditions that allow small ignitions to become megafires.

Methodological problems with the NGO analysis include (1) focusing on ignition counts rather than the more policy-relevant metric of acres burned or fire severity; (2) failing to control for human population and WUI presence (areas where people and structures are proximate to fuels are, unsurprisingly, where people - and therefore human ignitions - are concentrated); and (3) overlooking the countervailing evidence that access (roads and trails) enables faster initial attack, safer firefighter operations, and implementation of fuels treatments that reduce fire severity. Independent rebuttals - including technical commentary from practitioners and stakeholder organizations - therefore caution against using that single NGO analysis as the basis for sweeping national policy that restricts locally targeted access needed for stewardship and suppression.

Moreover, a careful reading of peer-reviewed research supports the proposition that: [where managers have the legal ability and access to implement mechanical thinning, prescribed fire, and to maintain tactical roads and landings, treated areas show measurably reduced fire behavior and often lower severity within treated footprints](#)¹⁷. Reviews and meta-analyses by Stephens, North, Brodie, Davis (Tamm review¹¹), and others demonstrate that mechanical treatments - especially when combined with prescribed fire - produce durable reductions in canopy bulk density and can provide the “anchors” needed for safe, effective firefighting and for scaling



prescribed/managed burning across the landscape. Those same studies also emphasize that treatments must be carefully sited and paired with monitoring and maintenance—precisely the types of safeguards NEPA and NFMA forest planning require.

Finally, on the management side, trade groups and forest-management practitioners (including the [American Forest Resource Council](#)) have documented how legal and physical loss of road access constrains initial attack and fuels work, arguing that [roads can and should be managed to reduce ignition risk while preserving their critical suppression and stewardship functions](#)¹⁸.

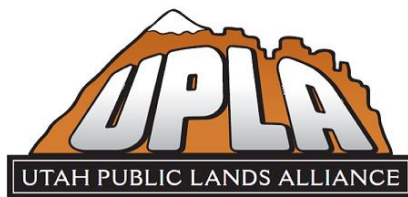
Agencies routinely use access control measures (gating, seasonal closures, permitting, and enforcement), riparian buffers, and BMPs to mitigate potential environmental risks of roads. Those tools allow managers to retain the public-safety and restoration benefits of access while minimizing ignition and water-quality harms. Rescinding blanket national prohibitions imposed by the Roadless Rule, and restoring forest-level planning authority, therefore enables the use of roads and access to reduce risk and support firefighter safety, which is the responsible, evidence-based course supported by both the peer-reviewed literature and longstanding Forest Service practice.

For these reasons, **the USFS should not base national policy on an unpublished, methodologically limited analysis that equates ignition proximity with causation. Instead, the EIS should:**

- **Evaluate ignition probability and ignition consequence separately**
- **Analyze how locally planned, tightly conditioned access and treatment networks affect both initial attack success and overall landscape fire outcomes**
- **Identify enforceable mitigation measures (design standards, monitoring, and funding commitments) that enable roads to function as tools for active stewardship and firefighter safety without producing ecological harm**

OHV & OUTDOOR RECREATION: POSITIVE DRIVERS OF FOREST HEALTH

The area land contained within the 45 million acres of currently designated roadless area, were once popular areas for OHV use, camping, and other outdoor recreation. Multiple communities that are economically dependent upon the health of the forest and public access to outdoor recreation in the forest lie within or in close proximity to the boundaries of Inventoried Roadless Areas (IRAs). The USFS should thus work to maximize OHV use and camping across the 45 million acres of land that will be re-opened to road and trail access through rescission of the Roadless Rule. NEPA requires agencies to consider a range of viable alternatives, and the recreation interest in IRAs justifies the inclusion of analysis of impact on public access to outdoor recreation as a component of the proposed Rule.



In accord with NEPA requirements, we ask the USFS to incorporate comprehensive analysis of impact on OHV, camping, and other outdoor recreation as a component of the Draft EIS.

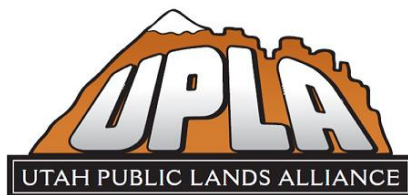
Additionally, a significant volume of OHV roads, improved campsites, and dispersed camping areas were closed and decommissioned by implementation of the 2001 Roadless Rule. It is pertinent for the USFS to thoroughly evaluate the impact of those closures in relationship to the scale of destruction inflicted by catastrophic wildfire since 2001, as well as the impact on wildfire prevention. OHV roads, improved campsites, and dispersed camping not only serve to create a thriving economy for outdoor recreation, they also function as vital infrastructure for prevention of catastrophic wildfire and support of wildfire fighting efforts. OHV roads form natural fuel breaks across the landscape. They also provide routes for firefighters to access remote back country terrain that is otherwise difficult, if not impossible, to address during a wildfire event. Improved campsites and dispersed camping areas provide staging sites for firefighters to establish functional base camps, store and repair equipment, and shelter firefighters throughout the extended timeframes that are often required to extinguish a wildfire.

OHV roads and trails serve as vital fuel breaks to prevent and slow the spread of wildfires across the forest landscape, and to provide firefighters with access to quickly deploy into remote areas of the forest when wildfires occur. Within the Bureau of Land Management (BLM) Environmental Assessment for the Williams Hill Recreation State Plan, the BLM accurately stated on pages 24-25 of the [planning document for WHRA](#)¹⁹,

“OHV routes and Staging Areas act as fuel breaks, since the vegetation along them is cleared... Construction of OHV routes and Staging Areas will effectively create new, secondary, permanent fuel breaks... OHV routes also serve to provide vehicle access to [remote] areas in order to suppress wildfires or conduct other resource management activities such as removal of dead or dying trees to reduce fuel load.”

UPLA urges the USFS to leverage rescission of the Roadless Rule to revisit analysis and designation of roads and trails that were closed by 2001 implementation to ensure restoration of vital infrastructure for wildfire prevention, and access for wildfire suppression.

Implementation of fuel reduction, hazard tree mitigation, and vegetation management projects provide ideal opportunities to re-open or create OHV roads and trails that align with broader forest management objectives, and serve long-term landscape management needs, while



increasing public safety through ingress routes for firefighters and first responders. Whereas another federal agency, BLM, has clearly recognized and acted on leverage of OHV roads and trails as vital fuel breaks on public lands, it is imperative that the USFS, as a sister federal agency, should do the same. In accord with the purpose and need for rescission of the Roadless Rule, restoration of previously closed OHV routes would serve to improve catastrophic wildfire prevention within and around current IRA acreage, thus serving the best interests of multiple-use values, endangered and threatened species and habitat, as well as the safety of humans who work and recreate in and near current IRAs.

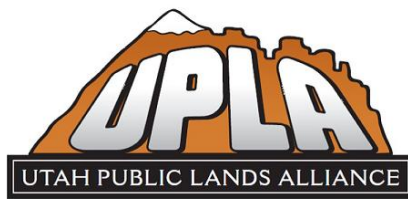
For the reasons cited above, **we urge the USFS to include analysis of immediate and cumulative effects on OHV and outdoor recreation interests within the Draft EIS and documentation of the proposed Rule.** This will allow the USFS to maintain full alignment with the stated need for rescission, as well as with NEPA requirements to ensure consideration for social and economic impact. In so doing, **we ask the USFS to include an itemized inventory of OHV roads, improved campsites, and dispersed camping areas that were closed or decommissioned by implementation of the 2001 Roadless Rule. We further ask the USFS to incorporate restoration of those OHV roads, improved campsites, and dispersed camping into the scope of all forthcoming land and resource management plans, forest and fuel management plans, travel management plans, and other new plans and plan revisions across all national forests in the USA.**

To support efforts to develop a full inventory in the state of Utah, UPLA offers volunteers through our membership to survey and itemize the terrain across IRAs.

Additionally, to support fuel reduction and restoration efforts now, and long-term maintenance in the future, UPLA offers support through membership volunteers. UPLA takes pride in a long history of contribution to construction, improvement, and maintenance of OHV roads, trails, and campsites through club “adoption” of specific sites as long-term commitments. We ask the USFS to consider this tangible offer of support as part of the resources available to ensure the success of the Roadless Rule rescission and post-rescission forest restoration and management.

REFUTING “BUDGET CONSTRAINTS” **AS JUSTIFICATION FOR THE ROADLESS RULE**

Proponents of the Roadless Rule argue that chronic financial constraints, staffing shortages, and budget shortfalls within the USFS justify retention of broad, national prohibitions on road construction or maintenance. This argument is both inconsistent with law and policy and contrary to the proven success of public-private stewardship partnerships. Management by

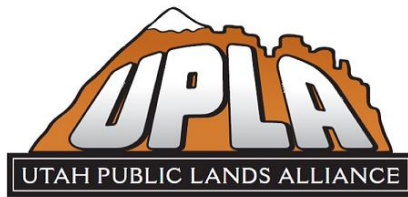


closure is not management at all—it is abdication. Congress has mandated active management of National Forest System (NFS) lands under the Multiple-Use Sustained-Yield Act of 1960⁶ (MUSYA, 16 U.S.C. §§ 528–531), the National Forest Management Act of 1976 (NFMA, 16 U.S.C. §§ 1600–1614), and the Healthy Forests Restoration Act of 2003 (HFRA, 16 U.S.C. §§ 6501 et seq.). These statutes require the USFS to balance recreation, watershed protection, timber, wildlife, and range resources - not to close lands simply because agency resources are strained. The Roadless Rule, by substituting closure for stewardship, fails to comply with these legal mandates.

Further, Forest Service policy itself rejects “management by closure.” The USFS *Volunteer and Service Agreement Handbook* (FSH 1509.11) and the *Service First and Partnership Authorities* encourage collaboration with the public, states, and tribes to achieve stewardship objectives where agency capacity is insufficient. The Federal Lands Recreation Enhancement Act (FLREA, 16 U.S.C. §§ 6801–6814) and the Volunteers in the National Forests Act of 1972 (16 U.S.C. §§ 558a–558d) explicitly authorize volunteer programs, partnerships, and cooperative agreements to carry out necessary management tasks.

Examples from Utah demonstrate the power of these partnerships. Volunteer organizations have consistently filled gaps in road and trail maintenance, fuels reduction, and habitat restoration—at no cost to taxpayers. The Utah Public Lands Alliance (UPLA) has mobilized volunteers to partner with the BLM Richfield Field Office and Fishlake National Forest on trail restoration projects, invasive weed removal, and route signage to support responsible OHV use. UPLA volunteers have organized cleanup days to remove illegal dumping and repair dispersed campsites in Sevier and Sanpete Counties, demonstrating that local recreationists are willing and able to shoulder stewardship responsibilities. Similarly, UPLA has partnered with other OHV clubs to maintain access roads and trailheads used by both motorized and non-motorized recreationists, ensuring that access remains safe and sustainable. Other Utah-based partnerships - such as Friends of the Paunsaugunt Trails near Bryce Canyon and Trail Hero volunteers in Washington County - show how recreation groups bring significant labor and expertise to keep trails open, reduce erosion, and protect cultural and natural resources. These partnerships illustrate that when agency budgets fall short, Utah communities and volunteer organizations step up to sustain access and forest health.

Research further supports this approach. A review of collaborative forest stewardship by the Pinchot Institute for Conservation and USDA has shown that partnership-based management improves ecological outcomes, lowers maintenance costs, and builds community buy-in for resource protection. The American Forest Resource Council (AFRC) and others have documented how volunteer agreements and stewardship contracting increase the pace and scale



of restoration without undermining environmental safeguards. These findings demonstrate that constrained budgets do not justify passive closure; they justify more robust collaboration.

The USFS possesses the legal authority and public support to expand these efforts; and should **include directives for expansion within the documentation and implementation protocol of the Draft EIS. Mechanisms include:**

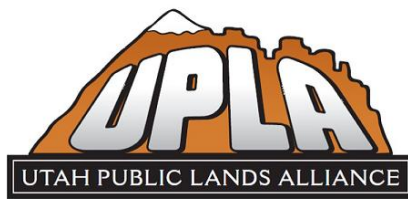
- **Memoranda of Understanding (MOUs)** with state and local governments, as well as nonprofit groups, to share labor and expertise.
- **Volunteer Service Agreements** (authorized under the Volunteers in the National Forests Act) to empower local clubs, civic groups, and OHV associations to take on maintenance tasks.
- **Adopt-A-Trail Programs** modeled after UPLA's successful efforts, where clubs take long-term responsibility for specific routes.
- **Cooperative Funding Agreements** through grant programs that support ongoing maintenance and monitoring.

The lesson is clear: financial hardship is not an excuse to abandon management of our public lands, and it certainly is not a reason to retain a one-size-fits-all prohibition like the Roadless Rule. Instead, rescission of the Roadless Rule will restore the ability of local forests to leverage partnerships, pursue active stewardship, and fulfill their statutory mandate to manage lands for multiple use and sustained yield.

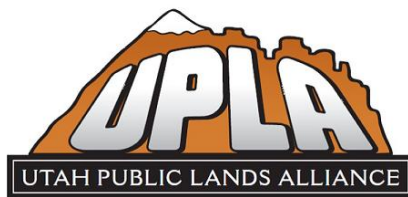
SUMMARY OF RECOMMENDATIONS TO ENSURE LEGALLY COMPLIANT IMPLEMENTATION

To avoid unintended consequences from implementation of changes to NEPA planning, UPLA recommends that the final Rule incorporates the following:

1. Make clear in its EIS and final action for this Rule that:
 - a. Rescission of the Roadless Rule is intended to restore forest-level discretion under NFMA and the Planning Rule,
 - b. Forest plans and project NEPA will be the primary mechanisms through which road, access, and vegetation decisions are evaluated and implemented, and
2. Explicitly defer to and operationalize NFMA/36 C.F.R. Part 219 forest plans as the principal mechanism for balancing multiple uses



3. Commit to baseline and post-implementation monitoring (ecological, hydrologic, cultural) and public reporting so that outcomes are transparent and adaptive management is possible
4. Demonstrate that the USFS is not overstepping Congressional direction and Congressional intent such that the best interests and needs of the public would be overrun through restriction or elimination of public access to USFS-managed public lands, nor restriction or elimination of public involvement in all facets of public land management planning
5. The EIS should include alternatives that restore forest-level authority to implement targeted access and fuel-reduction projects while specifying the mitigation, monitoring, and enforcement measures needed to ensure advancement of the multiple-use management mandate and enhanced public access, balanced with effective stewardship of the land and resources.
6. The USFS should not base national policy on an unpublished, methodologically limited analysis that equates ignition proximity with causation. Instead, the EIS should:
 - a. Evaluate ignition probability and ignition consequence separately
 - b. Analyze how locally planned, tightly conditioned access and treatment networks affect both initial attack success and overall landscape fire outcomes
 - c. Identify enforceable mitigation measures (design standards, monitoring, and funding commitments) that enable roads to function as tools for active stewardship and firefighter safety without producing ecological harm
7. Incorporate comprehensive analysis of impact on OHV, camping, and other outdoor recreation within the Draft EIS
8. Analyze immediate and cumulative effects on OHV and outdoor recreation interests within the Draft EIS
9. Include an itemized inventory of OHV roads, improved campsites, and dispersed camping areas that were closed or decommissioned by implementation of the 2001 Roadless Rule
10. Incorporate restoration of those OHV roads, improved campsites, and dispersed camping into the scope of all forthcoming land and resource management plans, forest and fuel management plans, travel management plans, and other new plans and plan revisions across all national forests in the USA
11. Expand public involvement in road and trail restoration and maintenance, forest restoration and health projects, and public access optimization projects within all areas current IRAs through implementation of the rescission of the Roadless Rule, to include:
 - a. Memoranda of Understanding (MOUs) with state and local governments, as well as nonprofit groups, to share labor and expertise



- b. Volunteer Service Agreements to empower local clubs, civic groups, and OHV associations to take on maintenance tasks
- c. Adopt-A-Trail Programs modeled after UPLA's successful efforts, where clubs take long-term responsibility for specific routes
- d. Cooperative Funding Agreements through grant programs that support ongoing maintenance and monitoring

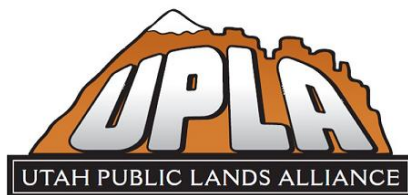
CLOSING

In addition to the information cited above, it is of the utmost imperative to note with emphasis that the Roadless Rule was a non-statutory regulation. Since the Rule was issued administratively in 2001 (not by Congress), it is legally rescindable via rulemaking compliant with the Administrative Procedure Act. Multiple legal precedents confirm reversal. The 2020 rescission in the Tongass National Forest, later reinstated in 2023, demonstrates agency discretion in adjusting administrative rules based on management needs. No court has declared the Roadless Rule statutorily or constitutionally mandatory – thus rescission through a new rulemaking fully and definitively complies with all legal standards and justifications.

In addition to our preceding comments, we support any additional comments from individuals, groups, associations, and the general public that encourage the USFS to uphold their mission and commitment to the public to administer all USFS-managed public lands in a manner that maximizes public access, and sustains the health, diversity, cultural resources, and values of the land for the use and enjoyment of present and future generations. We strongly advocate against any components of the Rule that would diminish or eliminate public access to USFS-managed public lands.

We would like to close by once again calling your attention to the rights and interest that UPLA members, all outdoor recreationists, and the general public have as vested stakeholders of USFS-managed lands. We encourage the USFS to uphold their alignment with the USFS mission and operating guidelines, their responsibility to manage our public lands for the benefit of all American citizens, and their accountability to operate within the scope of congressionally-granted boundaries as contracted managers of our nation's public lands - the citizenry's prized national heritage.

Utah Public Lands Alliance would like to be considered an interested public for the Rule. Information can be sent to the following address and email address:



Rose Winn
Utah Public Lands Alliance
PO Box 833, St. George, UT 84771
rose@utahpla.com

Sincerely,

Rose Winn
Natural Resources Consultant
Utah Public Lands Alliance
559.862.6382

Loren Campbell
President
Utah Public Lands Association
909.499.3295

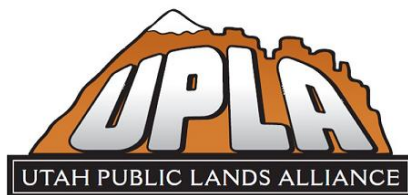
cc: Senator Mike Lee, Senator John Curtis, Congresswoman Celeste Maloy, Congressman Blake Moore, Congressman Burgess Owens, Governor Spencer Cox, PLPCO Director Redge Johnson, UPLA Trustees and Members

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