

# UTAH PUBLIC LANDS ALLIANCE

*Together We Will Win,  
But We Can't Do It Without You*

October 6, 2026

Director, Ecosystem Management Coordination  
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Submitted electronically via <https://www.regulations.gov/commenton/FS-2025-0001-223869>, and via email to addressees and CC recipients noted.

RE: Special Areas; Roadless Area Conservation; A Proposed Rule by the Forest Service on [08/20/2026](#); Department of Agriculture, Forest Service, 36 CFR Part 294, RIN 0596-AD66

## **RECOMMENDED ACTION: Rescind the 2001 Roadless Area Conservation Rule**

Dear Chief Schultz & Director of Ecosystem Management Coordination,

Utah Public Lands Alliance (UPLA) is writing to provide public comment on the [proposed rule to Rescind the 2001 Roadless Area Conservation Rule](#) (Roadless Rule), 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 the existing Roadless Rule, along with all components and phases of public engagement in National Environmental Policy Act (NEPA) procedures and decision making as related to USFS public land management. Thus, our members are among the hundreds of millions of USDA Forest Service stakeholders who will be impacted by the outcome of revisions to 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 stakeholders by educating and empowering our members to secure, protect, and expand shared outdoor recreation access 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 Jeepster 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 and Red Rock 4 Wheelers.

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## **GENERAL COMMENTS**

UPLA strongly supports Alternative 2 and urges the Forest Service to fully rescind the 2001 Roadless Area Conservation Rule. The Rule has constrained management across more than four million acres of Utah's National Forest System lands for 25 years, imposing a national regulatory structure that restricts road construction, road reconstruction, and timber harvest irrespective of the substantially different management needs of Utah's forests, rural communities, recreation systems, watersheds, and transportation networks. Full rescission is necessary to return these lands to the multiple-use management framework Congress established for National Forest lands.

Utah provides an especially compelling basis for rescission. Congress directly addressed the disposition of Utah's National Forest roadless lands through the Utah Wilderness Act of 1984. Congress designated selected RARE II lands as Wilderness while releasing other reviewed lands for non-Wilderness multiple-use management. The subsequent Roadless Rule imposed another nationwide layer of restrictions across lands Congress had not designated as Wilderness. Over time, continued administrative preservation of roadless characteristics has also provided a mechanism for maintaining Wilderness-compatible conditions outside congressionally designated Wilderness and preserving landscapes for possible future Wilderness designation. UPLA rejects administrative roadlessness as a substitute for congressional action.

The Rule has also constrained the Forest Service's ability to respond to Utah's contemporary management needs. Utah's National Forests require active vegetation management, fuels treatment, watershed restoration, wildfire preparedness, post-fire recovery, recreation infrastructure, and a transportation system capable of being maintained and adapted as conditions change. Roads are not merely development footprints. They provide infrastructure for forest management, emergency response, firefighting, grazing, hunting, dispersed camping, OHV recreation, search and rescue, and access to remote public lands. A 25-year-old roadless classification should not dictate whether managers can consider transportation infrastructure necessary to accomplish those purposes.

Motorized access is particularly important in Utah, where National Forest roads and trails form integral parts of major recreation networks and rural transportation systems. The Paiute and Arapen trail systems demonstrate how federal routes connect public lands directly with rural communities and support recreation economies extending far beyond Forest boundaries. UPLA supports management that maintains, reconnects, reconstructs, and, where necessary, relocates routes rather than allowing regulatory barriers to convert correctable infrastructure or resource problems into permanent losses of access.

Alternative 2 should also be implemented in conjunction with the Forest Service's proposed Travel Management reforms. Rescinding the Roadless Rule can restore the agency's ability to consider construction and reconstruction, while Travel Management reform can address designation, connectivity, closure review, dispersed-use access, and modification of the motorized transportation system. Together, these reforms provide an opportunity to move federal transportation policy away from regulatory attrition and toward active management of a functional access network.

UPLA further urges the Forest Service to ensure that rescission is genuine and durable. Former Inventoried Roadless Area boundaries should not become permanent administrative land allocations after

the Rule is removed. The Forest Service should not reconstruct substantially identical restrictions through Forest Plan amendments, management-area prescriptions, regional directives, new administrative classifications, or Utah-specific roadless regulations. Nor should preservation of "roadless character" become a successor standard that perpetuates the same restrictions under different terminology.

Future management decisions should instead be based upon current conditions, legitimate management objectives, applicable law, transportation needs, and the multiple-use responsibilities assigned to the Forest Service by Congress. Utah's counties, recreation organizations, permittees, local communities, and public-land users should have meaningful participation in those decisions, particularly where federal actions affect county transportation systems, R.S. 2477 interests, community access, or established recreation networks.

UPLA urges the Forest Service to select Alternative 2 without dilution or partial retention of the existing regulatory regime. Full rescission should restore the ability to actively manage Utah's National Forests, maintain and improve transportation infrastructure, protect and expand meaningful public access, strengthen wildfire and restoration capability, and support the rural communities whose economies and way of life are inseparable from access to surrounding public lands.

The Roadless Rule has outlived its justification as a national management mandate. Utah's National Forests should no longer be managed according to a presumption of administrative roadlessness. They should be managed for access, stewardship, resilience, and the full range of multiple uses Congress intended.

### **THE ROADLESS RULE IMPROPERLY DISPLACES THE MULTIPLE-USE FRAMEWORK CONGRESS ESTABLISHED FOR NATIONAL FOREST MANAGEMENT**

UPLA supports complete rescission of the 2001 Roadless Area Conservation Rule because its national, prescriptive framework is fundamentally misaligned with the manner in which Congress directed the National Forest System to be managed. The Roadless Rule establishes broad prohibitions on road construction, road reconstruction, and certain timber-harvest activities within Inventoried Roadless Areas (IRAs), subject to specified exceptions, without first requiring a determination that those restrictions constitute the appropriate management response for a particular forest, watershed, transportation system, recreation area, or community (U.S. Department of Agriculture, Forest Service [USFS], 2001).

For Utah, the magnitude of that policy is difficult to overstate. Congressional Research Service analysis identified **4.0135 million acres of Inventoried Roadless Areas in Utah, encompassing 49% of National Forest System acreage in the state** (Hoover, 2020). These lands occur across Utah's National Forests and encompass dramatically different environments, from the high Uinta Mountains and Wasatch Front watersheds to central Utah's plateaus and the forests surrounding southeastern Utah communities. The Forest Service's original Roadless FEIS identified substantial IRA acreage on individual forests associated with Utah, including 796,000 acres on Ashley, 776,000 acres on Dixie, 717,000 acres on Fishlake, 601,000 acres on Manti-La Sal, 528,000 acres on the former Uinta, and 598,000 acres on the former Wasatch-Cache National Forest (USFS, 2000).

The sheer proportion of Utah's National Forest land affected makes the underlying policy question particularly consequential. UPLA does not contend that four million acres of Utah National Forest should be developed, roaded, harvested, or opened indiscriminately to motorized travel. We contend that management decisions affecting such an extraordinary proportion of Utah's National Forest estate should begin with the statutory multiple-use framework enacted by Congress and with analysis of actual conditions on the ground, rather than with a categorical national regulatory presumption established 25 years ago.

#### **A. Multiple Use Requires Deliberate Balancing, not a Predetermined National Management Outcome**

Congress established a broad and deliberate mandate for National Forest management. The Multiple-Use Sustained-Yield Act (MUSYA) directs that National Forests "shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes" and defines multiple use as management of renewable surface resources in the combination that best meets the needs of the American people (16 U.S.C. §§ 528–531). The National Forest Management Act (NFMA) subsequently established an interdisciplinary forest-planning framework through which these sometimes competing resource demands are evaluated and reconciled at the National Forest level (16 U.S.C. § 1604).

That statutory framework does not require every use to occur everywhere. Multiple use necessarily involves choices. Some landscapes warrant intensive watershed protection. Others require vegetation treatment. Some routes should be relocated or seasonally restricted because of documented resource concerns. Other landscapes can responsibly accommodate motorized recreation, grazing, forest products, fuels reduction, wildlife management, dispersed camping, hunting, fishing, or combinations of these activities. The essential point is **where and how those choices should be made.**

NFMA requires interdisciplinary planning incorporating physical, biological, economic, and other sciences, coordination with State and local governments, public participation, and periodic revision as conditions change (16 U.S.C. § 1604(a)-(f)). Congress therefore created a management system capable of differentiating among landscapes and adapting as their ecological and social conditions evolve.

The Roadless Rule superimposed a different structure upon that process. Across millions of acres, the Rule determined at the national level that road construction, road reconstruction, and associated management activities would presumptively be unavailable before a local responsible official determined whether those tools were appropriate to the site in question (USFS, 2001).

This is particularly difficult to reconcile with Utah's geography.

Conditions on the Ashley National Forest and Uinta Mountains bear little resemblance to those on the Dixie National Forest, where ponderosa pine, mixed conifer, high plateaus, steep canyon systems, and communities exposed to wildfire create an entirely different management environment. The Fishlake National Forest contains extensive aspen and conifer systems and some of Utah's most heavily used motorized recreation landscapes. The Manti-La Sal National Forest stretches from the Wasatch Plateau and Sanpete Valley to the La Sal and Abajo Mountains near Moab and Monticello. The Uinta-Wasatch-

Cache National Forest simultaneously serves critical watershed functions and extraordinary recreation demand associated with the Wasatch Front.

These are not interchangeable landscapes. Yet the national Roadless Rule begins with substantially the same regulatory premise for each.

The Forest Service's own geographic information confirms the breadth of the classification. Utah's official State Geographic Information Database, using Forest Service data, maps IRAs across Utah based principally upon inventories incorporated into forest plans or inherited from earlier Roadless Area Review and Evaluation processes. The State notes that the underlying inventory was consolidated for the Roadless rulemaking from information submitted by individual forests in 2000 (Utah Geospatial Resource Center [UGRC], 2026).

A quarter-century-old inventory should not function as a permanent substitute for contemporary land-management judgment.

UPLA has consistently advocated a different approach: **allow professional land managers to identify the actual resource condition, determine the desired outcome, evaluate available management tools, consult affected communities and stakeholders, and select the response best supported by current evidence and applicable law.**

That philosophy is already visible in successful Utah forest-management efforts. On the Fishlake National Forest, the Monroe Mountain Aspen Ecosystems Restoration Project employs a combination of prescribed fire, mechanical treatments, conifer removal, and other landscape-scale techniques to promote aspen regeneration and improve ecological resilience. UPLA cited Monroe Mountain during its earlier Roadless comments because the project demonstrates the value of management prescriptions developed around the actual ecology of a Utah landscape rather than adherence to a singular national theory of passive management.

Management tools should follow resource conditions. Resource conditions should not be forced to accommodate the limitations of an administrative designation.

#### **B. "Inventoried Roadless" is an Administrative Classification, not a Congressional Land Designation**

UPLA also urges the Forest Service to preserve a clear legal distinction between lands Congress has designated for preservation and lands that an agency has administratively classified through inventory. Congress knows how to remove federal lands from ordinary multiple-use management when it chooses to do so. Under the Wilderness Act, additions to the National Wilderness Preservation System receive specific statutory protection. Wilderness designation carries substantial restrictions on roads, motorized vehicles, motorized equipment, structures, installations, and other forms of development, subject to the terms and exceptions enacted by Congress (16 U.S.C. §§ 1131–1136).

An Inventoried Roadless Area is something fundamentally different. IRA status does not constitute a congressional finding that the land should be managed as Wilderness. It does not establish that transportation infrastructure is environmentally inappropriate throughout the inventory. It does not establish that active vegetation management is unnecessary. It does not determine that motorized recreation is incompatible with the landscape. Nor does it demonstrate that road reconstruction, rerouting, fuels treatment, watershed restoration, grazing infrastructure, emergency access, or another multiple-use activity would produce unacceptable effects. IRA status records an **administrative classification** derived from Forest Service inventory and planning history.

The Forest Service itself has now emphasized how misleading the word "roadless" can become when treated as a description of actual physical conditions. Nationally, there are thousands of miles of existing roads within IRAs, including National Forest System roads and roads under State, county, or other ownership. The agency reports that roughly half of the lands governed by the national Roadless Rule are within one mile of a road and 13.3 million acres, 31% of the affected lands, are within one-half mile of one (USFS, 2025).

That reality is especially relevant to Utah. The state's Roadless inventory encompasses lands adjacent to or intertwined with established transportation and recreation landscapes in the Uinta Mountains, American Fork Canyon, the central Utah mountains, the Wasatch Plateau, and the mountains surrounding Moab and Monticello. Many of these landscapes have long histories of hunting, grazing, camping, motorized recreation, timber activity, watershed management, and public access. The classification therefore should not be transformed, through regulatory inertia, into a permanent presumption that these lands must remain functionally isolated from future transportation or active-management decisions.

Nor should an administrative inventory be allowed to accomplish indirectly what Congress has reserved to itself through statutory land designation. The Ninth Circuit's early Roadless Rule litigation illustrates the substantive consequence. In *Kootenai Tribe of Idaho v. Veneman*, the court observed that implementation of the Rule made 58.5 million acres "more committed to pristine wilderness, and less amenable to road development for purposes permitted by the Forest Service" (313 F.3d 1094, 1105 [9th Cir. 2002]). UPLA recognizes that *Kootenai Tribe* did not invalidate the Roadless Rule on that basis. The decision is relevant here for a different reason: the court recognized that the Rule materially altered the management posture of the affected lands.

Twenty-five years later, the policy question we are facing is: is it legally and administratively justified for that nationally prescribed posture to continue?

UPLA concludes that it is not.

Utah already contains congressionally designated Wilderness and numerous other statutory and administrative land protections. Those classifications must be honored according to their governing authorities. But lands that Congress has **not** designated as Wilderness should not be managed under a durable administrative surrogate that begins with comparable assumptions against roads and active management.

**The proper presumption for ordinary National Forest System lands is neither development nor preservation. It is multiple-use evaluation under the laws Congress enacted.**

### **C. Full Rescission Restores Management Authority without Predetermining What Local Managers Must Do with It**

Much of the opposition to rescission proceeds from an assumption that eliminating the national Roadless Rule is equivalent to approving road construction or timber harvest across the affected acreage. It is not. Rescission does not build a road in the Uinta Mountains. It does not authorize a timber sale on the Dixie National Forest. It does not create an OHV route on the Fishlake National Forest. It does not compel vegetation treatment on the Manti-La Sal. It does not eliminate Wilderness, alter a Wild and Scenic River designation, or repeal the Endangered Species Act, Clean Water Act, National Historic Preservation Act, NFMA, or NEPA.

It simply removes a separate nationwide regulatory prohibition.

The Forest Service expressly states that rescission would return management of affected lands to the ordinary land-management planning process and allow local responsible officials greater flexibility to respond to ecological, economic, social, wildfire, and community conditions (USFS, 2025, 2026). The agency further acknowledges that IRAs are not homogeneous landscapes. Nationally, 63% are forested, while substantial portions consist of other vegetation and landscape types. Existing roads occur within the inventories, and their wildfire exposure varies substantially by region.

Utah's circumstances reinforce the need for that flexibility.

Consider again the Fishlake National Forest. If a landscape-scale restoration project requires mechanical treatment, temporary access, prescribed fire preparation, or reconstruction of transportation infrastructure, those needs should be evaluated against the ecological benefits and environmental consequences of the project itself. If a route serving a recreation area has developed unacceptable erosion, managers should be able to evaluate whether reconstruction or relocation produces a better environmental outcome than decommissioning the route. If wildfire risk near a rural community warrants strategic fuels treatment, the responsible official should be able to examine whether temporary or permanent access would improve the effectiveness and safety of that work.

Conversely, where the evidence demonstrates that an area should remain without additional roads, nothing in rescission requires the Forest Service to construct one. This is the management flexibility UPLA urges the Forest Service to embrace through rescission of the Roadless Rule.

It is also particularly relevant to Utah's outdoor recreation community. Forest transportation systems do not serve a single constituency. The same roads that provide access for OHVs can provide access for hunting and fishing, dispersed camping, trailheads, livestock management, forest restoration, emergency response, search and rescue, fuels treatments, and wildfire suppression. Their utility cannot rationally be assessed by categorizing a road solely as an environmental impact. Roads are infrastructure, and like

other infrastructure, their environmental and social value depends upon where they are located, how they are designed and maintained, and what functions they serve.

UPLA's members see this reality repeatedly across Utah. Responsible motorized recreation depends upon maintained routes, appropriate drainage, sustainable alignments, adequate staging opportunities, connectivity among trail systems, and meaningful partnerships between land managers and recreationists. Where resource impacts occur, we support correcting the impact through engineering, maintenance, rerouting, seasonal management, restoration, education, enforcement, or other targeted mitigation whenever those tools can reasonably address the underlying problem. Closure should not substitute for management merely because it is administratively easier.

The same principle applies beyond recreation. The Forest Service reports that the Roadless Rule currently governs 44.7 million acres nationally and that 10.2 million acres of those lands are within the wildland-urban interface, with another 4.8 million acres within one mile of the WUI. The agency also reports that 5.5 million IRA acres experienced moderate- or high-severity wildfire between 1984 and 2024 and that the incidence of such fire has increased in recent decades (USFS, 2025). These national statistics do not prove that roadlessness causes wildfire. They demonstrate why management policy must retain the ability to respond as forest conditions change.

The proposition is straightforward. A regulation adopted in 2001 should not permanently deprive a Forest Supervisor in 2026, 2036, or 2046 of a legitimate management tool simply because an area appeared on an inventory developed under conditions that existed decades earlier.

#### **D. Utah Demonstrates Why Full Rescission Is Preferable to Reform of the National Rule**

UPLA specifically supports full rescission, rather than modification of the Roadless Rule or replacement of its existing restrictions with a somewhat more permissive national framework. A revised national rule would leave the central policy defect intact. Whether a national prohibition contains five exceptions, ten exceptions, or twenty exceptions, it continues to presume that Washington should determine in advance which management tools may be considered across millions of acres before local managers evaluate the affected landscape. It perpetuates a separate regulatory class for lands Congress has not designated Wilderness and requires future management proposals to fit within centrally prescribed exceptions rather than beginning with the multiple-use planning framework Congress enacted.

Utah offers little justification for retaining that architecture. With 4.0135 million acres, or 49% of the state's National Forest System lands, inventoried as roadless, Utah has a particularly strong interest in ensuring that administrative inventories do not become permanent land-management designations by default (Hoover, 2020).

UPLA instead supports returning these lands to forest-level planning under NFMA, MUSYA, applicable environmental laws, and the governing forest plans. Local officials should be able to preserve roadless characteristics where the evidence supports doing so. They should also be able to authorize active management, improve recreation connectivity, reconstruct necessary infrastructure, conduct vegetation

treatments, mitigate wildfire hazards, restore watersheds, and employ other management tools when site-specific analysis demonstrates that those actions better advance the public interest.

Utah's National Forests do not need less conservation. They need more capable management.

UPLA has long advocated responsible access coupled with stewardship because those objectives symbiotically reinforce one another. Recreationists who can reach public lands become volunteers who maintain trails, report resource damage, participate in restoration, support rural economies, educate other users, and develop lasting investment in the landscapes they use. Ranchers, hunters, OHV enthusiasts, anglers, county governments, conservation interests, Tribes, watershed managers, and Forest Service professionals possess knowledge that can materially improve local decisions. NFMA provides the forum in which those interests can be evaluated together.

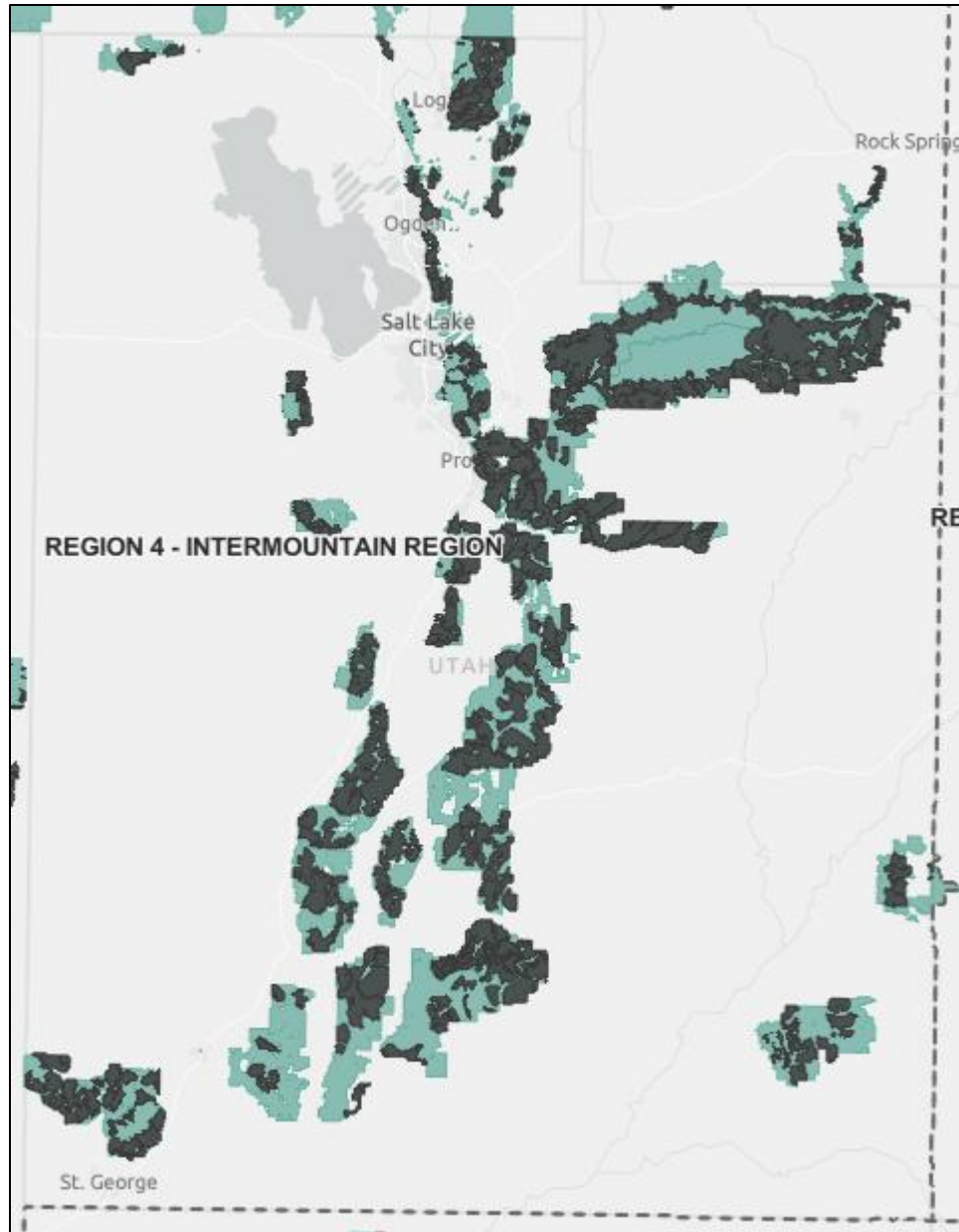
The Roadless Rule instead begins by removing options from that discussion.

For Utah, full rescission offers a better course. It neither commands development nor abandons environmental protection. It restores the discretion necessary to determine, forest by forest and project by project, what responsible multiple-use management actually requires. Congress established a system capable of making those decisions. UPLA urges the Forest Service to return Utah's Inventoried Roadless Areas to it.

### **UTAH'S NATIONAL FORESTS REQUIRE PLACE-BASED MANAGEMENT, NOT A UNIFORM NATIONAL PRESCRIPTION**

#### **UPLA supports selection of Alternative 2 and full rescission of the 2001 Roadless Area**

**Conservation Rule** because Utah provides an unusually compelling example of why National Forest management must remain responsive to the physical landscape, local communities, recreation patterns, wildfire conditions, and resource-management needs of individual forests. Nearly half of Utah's National Forest System acreage was placed within Inventoried Roadless Areas (IRAs), meaning that a national regulatory construct adopted 25 years ago continues to influence management across an extraordinary share of Utah's forest estate. The Forest Service's 2001 Final Environmental Impact Statement identified extensive IRA acreage on every major National Forest serving Utah, including 796,000 acres on Ashley, 776,000 acres on Dixie, 717,000 acres on Fishlake, 601,000 acres on Manti-La Sal, 528,000 acres on the former Uinta, and 598,000 acres on the former Wasatch-Cache National Forest (U.S. Department of Agriculture, Forest Service [USFS], 2000).



The vast scale of public lands that are currently swallowed up in IRA status within the state of Utah quickly becomes evident when viewed as a state map. The image above is taken from the US Forest Service's Arc GIS map platform, from the 2001 Roadless Rule Rescission Draft Environmental Impact Statement Data Web Viewer. The green and grey shaded areas comprise all National Forest public lands within Utah, which equates to 8.2 million acres. The grey shaded areas are Inventoried Roadless Areas, which equals 4.01 million acres, or 49% of all National Forests in Utah. It is wildly disproportionate to have a full half of all Forest Service managed public lands shielded behind a curtain of highly restrictive public access due to IRA classification!

Those figures matter because the lands captured within the IRA classification are anything but uniform. Ashley National Forest extends from the Wyoming Basin and Tavaputs Plateau to the Uinta Mountains,

with elevations ranging from 5,500 feet along the Green River to 13,528 feet at Kings Peak. 70% of the Forest lies within the Uinta Mountains (USFS, n.d.-a). Dixie National Forest encompasses high plateaus and dramatically different vegetation communities and fire environments in southern Utah. Fishlake National Forest contains extensive aspen-conifer systems, heavily used motorized recreation landscapes, grazing allotments, wildlife habitat, and rural communities economically and culturally intertwined with the Forest. Manti-La Sal National Forest stretches from central Utah into southeastern Utah and is itself divided among geographically distinct management areas surrounding the Manti Division, Moab, and Monticello (USFS, n.d.-b).

A national rule cannot convert those fundamentally different landscapes into equivalent management problems merely by drawing the same regulatory classification around them.

Alternative 2 offers a more rational approach. Full rescission would allow the Forest Service to address IRA lands through existing forest plans, interdisciplinary planning, project-level environmental analysis, and the body of environmental and resource law already applicable to National Forest System lands. It would permit local officials to determine whether preservation of roadless characteristics, vegetation treatment, transportation access, recreation infrastructure, watershed restoration, fuels reduction, or some combination of those objectives represents the appropriate management response for the landscape before them.

UPLA supports that flexibility because **good land management depends upon choosing management prescriptions after evaluating the land, not choosing the outcome first and requiring the land to conform to it.**

#### **A. Utah's Forests Illustrate Why Management Must Respond to Conditions on the Ground**

Utah's National Forests vary enormously not only in ecology, but also in how the public uses them. The Uinta-Wasatch-Cache National Forest encompasses 2.2 million acres and receives 9 million visitors annually, making it one of the most heavily visited National Forests in the country. The Forest Service describes it as a landscape where rapidly growing metropolitan communities meet the backcountry, with intensive year-round demand for access from the Wasatch Front and surrounding communities (USFS, n.d.-c). Management there must reconcile watershed protection, extraordinarily high recreation demand, wildfire exposure, transportation infrastructure, wildlife, community protection, and a growing population.

The Ashley National Forest presents a markedly different management environment. Its 1.3 million-acre recreation landscape includes Flaming Gorge National Recreation Area and 1,151 miles of roads and trails available for ATV travel, while the same Forest contains 276,175 acres of congressionally designated High Uintas Wilderness (USFS, n.d.-a). Ashley therefore illustrates the capacity of existing federal law and forest planning to provide both highly protected landscapes and extensive motorized recreation opportunities within a single National Forest without requiring a nationwide Roadless overlay to dictate the balance.

Fishlake presents still another set of circumstances. Forest Service planning documents recognized decades ago that the Forest experienced demand for both roaded and unroaded recreation and specifically identified demand for primitive motorized recreation involving challenging Jeep, ATV, and motorcycle opportunities. The agency further recognized that roads are the primary means by which visitors reach recreation opportunities on Fishlake and that many existing roads originated in timber, grazing, mining, and power-development access before acquiring substantial recreational importance (USFS, 2006). This is particularly relevant to UPLA because Utah's historic forest roads frequently serve several functions simultaneously. A route may provide access for grazing administration during one season, hunting during another, OHV recreation throughout the summer, and fuels treatment or emergency response when management conditions require it. Evaluating that road solely through the lens of "roadlessness" fails to account for its actual function within the larger forest system.

Local planning is capable of recognizing those relationships. A national prohibition is not.

### **B. Utah's Successful Active-Management Projects Demonstrate the Value of Local Professional Judgment**

Utah also provides concrete evidence that active management and environmental stewardship need not exist in opposition.

The Monroe Mountain Aspen Ecosystems Restoration Project on Fishlake National Forest is particularly instructive. UPLA has previously highlighted Monroe Mountain because it employs a combination of mechanical treatment, prescribed fire, targeted conifer removal, and other landscape-scale techniques to promote aspen regeneration, improve ecological resilience, enhance wildlife habitat, and address watershed and fuels objectives. UPLA's 2025 Roadless comments identified Monroe Mountain as an example of precisely the kind of locally developed management that should be encouraged rather than constrained by a nationwide regulatory presumption (UPLA, 2025, 2026).

Other Utah restoration efforts illustrate the same principle. Utah's Watershed Restoration Initiative identifies projects on the Uinta-Wasatch-Cache National Forest involving mechanical fuels treatment, prescribed fire, and aspen restoration to address conifer encroachment, wildlife habitat, forest structure, and wildland-urban-interface risk. Project documentation expressly recognizes the Roadless Rule as a management consideration where treatment occurs within IRAs and identifies Forest Plan objectives calling for thousands of acres of annual aspen treatment through fire use and timber harvest (Utah Watershed Restoration Initiative [WRI], 2026).

These examples reveal the weakness of treating absence of roads or mechanical activity as a proxy for ecological health.

Aspen systems affected by conifer encroachment do not recover because an administrative boundary is maintained. Hazardous fuels do not decline because access remains difficult. Wildlife habitat does not necessarily improve through passive management. Watersheds recovering from severe disturbance may require intervention. In many circumstances, the environmentally preferable action is affirmative treatment.

The appropriate management question is therefore not whether human intervention is inherently desirable or undesirable. It is whether a particular treatment is scientifically justified for the affected landscape, and if so, what and infrastructure are reasonably necessary to implement it while minimizing collateral effects.

Alternative 2 gives local professionals greater latitude to answer that question.

### **C. Forest-Level Planning Allows Access and Recreation to Be Evaluated as Components of the Landscape Rather Than Presumed Threats to It**

UPLA is particularly concerned with the tendency to discuss road access as though roads have only one environmental function: disturbance. Utah's experience demonstrates otherwise. Forest roads and motorized trails support recreation, hunting, dispersed camping, grazing, search and rescue, wildlife management, fuels treatment, prescribed-fire preparation, restoration, administrative access, and wildfire response. Whether a particular route produces a net benefit or unacceptable resource impact depends upon its location, construction, drainage, maintenance, use intensity, surrounding habitat, and management.

The Fishlake National Forest's own recreation analysis is unusually candid on this subject. It recognizes both demand for primitive motorized opportunities and the importance of roads as the principal means of reaching Forest recreation. It further recognizes that Utah's increasing population would intensify demand for both roaded and unroaded recreational experiences (USFS, 2006).

That demand is no longer theoretical. Utah has experienced substantial population growth since those planning documents were prepared, while outdoor recreation has become increasingly important to rural communities and the State's economy. Yet the underlying Roadless inventories remain substantially rooted in information developed through forest planning inventories and, in some cases, earlier RARE II information. Utah's official Roadless spatial database explains that the national dataset was assembled from inventories submitted by individual forests around 2000 and that RARE II information was used where more current inventories were unavailable (Utah Geospatial Resource Center [UGRC], 2026). A historical inventory can be useful planning information. It should not become a permanent substitute for current planning.

The distinction becomes increasingly consequential as recreational use, forest conditions, transportation needs, wildfire exposure, and community patterns evolve. A sustainable route connection that makes sense today may not have been contemplated when an inventory was prepared decades ago. An existing road that once primarily served timber operations may now provide essential recreation or emergency access. Conversely, a legacy route may have become environmentally unsustainable and warrant relocation.

UPLA supports giving local Forest Service professionals the ability to make each of those decisions on the evidence. Full rescission does not require expansion of the transportation system. It permits the Forest Service to consider expansion, reconstruction, relocation, or reduction where appropriate. That is precisely the flexibility a modern transportation network requires.

#### **D. Recent Utah Wildfires Reinforce the Need for Adaptable Transportation and Management Systems**

Wildfire adds urgency to the need for locally responsive management. The 2025 Monroe Canyon Fire on and around Fishlake National Forest demonstrates how rapidly a forest transportation system can become a matter not merely of recreation convenience, but of landscape-scale public access and resource management. By August 1, 2025, the fire had burned more than 55,000 acres. Utah Division of Wildlife Resources reported that fire closures affected 67% of mule deer habitat and 72% of elk habitat in the affected area and closed 50% to 60% of the Monroe hunting unit. Access to remaining open areas was limited to four Forest Service roads while five other access routes were closed (Utah Division of Wildlife Resources [UDWR], 2025).

Transportation infrastructure also affects suppression access, treatment feasibility, evacuation, restoration, wildlife management, post-fire recovery, and the public's ability to reach unaffected portions of a landscape. The relevant analysis cannot therefore end with the proposition that a road constitutes disturbance.

When considering rescission of the Roadless Rule, the question that must be asked is whether the **right transportation infrastructure exists in the right location for the management demands of the landscape**. That determination is inherently local. A District Ranger managing fire-prone vegetation near a Utah community should be able to evaluate whether an existing road should be retained, reconstructed, relocated, or supplemented to facilitate fuels treatment and emergency operations. A wildlife biologist should be able to assess how route configuration affects seasonal habitat. Hydrologists should be able to evaluate drainage and sedimentation. Recreation managers should be able to identify connectivity and public-use needs. Fire personnel should be able to explain where access materially affects operational capability.

Alternative 2 allows those disciplines to inform the decision together rather than subordinating them to a national presumption adopted before the current management problem arose.

#### **E. Local Management Must Include the People Who Know and Steward These Landscapes**

UPLA's support for local decisionmaking is equally grounded in the role of public stakeholders. We do not envision forest-level management as an agency-only exercise. Utah's most durable public-land solutions are frequently developed through collaboration among Forest Service personnel, counties, State agencies, Tribes, grazing permittees, watershed interests, conservation organizations, recreation groups, local businesses, hunters, anglers, and residents whose communities are intertwined with National Forest lands. Motorized recreationists are particularly capable stewardship partners because they possess both extensive geographic knowledge and the equipment necessary to perform meaningful work in remote areas.

Across Utah, OHV clubs and volunteers clear trails, maintain routes, repair damage, install signs, remove trash, participate in restoration, report emerging problems, educate users, and assist public-land managers. UPLA has promoted Volunteer Service Agreements, Adopt-A-Trail partnerships, cooperative funding, and

long-term club responsibility for individual routes as practical means of expanding agency maintenance capacity (UPLA, 2025).

This is more than a recreational benefit. It is a management resource.

A person who has traveled the same Utah trail for twenty years may recognize where a culvert repeatedly fails, where spring runoff damages an alignment, where users leave the designated route because signage is inadequate, or where a modest reroute could eliminate a recurring conflict. That experiential information does not replace hydrological, biological, archaeological, or engineering analysis. It complements it. UPLA's philosophy is therefore centered upon **stewardship through participation rather than preservation through exclusion**.

Responsible access creates people with a direct investment in the continued health of the landscape. Those users can become maintenance partners, observers, educators, and advocates for the places they recreate. Closing access can sometimes be necessary, but it also removes precisely the constituency capable of helping an understaffed agency maintain remote public lands. The Forest Service's multiple-use mission is best served when that constituency has a meaningful seat at the table.

#### **F. Alternative 2 Provides Utah the Management Flexibility That a Revised National Roadless Framework Would Still Withhold**

UPLA does not support retaining the basic Roadless structure with additional exceptions or modest revisions. The central deficiency is not simply that the existing Rule contains too few exemptions. It is that a national regulation decides in advance which management tools local officials may consider across millions of acres of profoundly different landscapes. Adding exemptions would modify the boundaries of that restriction without correcting its premise.

Alternative 2 offers the cleaner approach. Following rescission, Forest Service officials would still operate within governing forest plans and applicable federal law. Wilderness would remain Wilderness. Existing statutory protections would remain in force. Projects requiring environmental analysis would continue through the applicable review process. Resource specialists would continue evaluating effects on wildlife, watersheds, cultural resources, soils, vegetation, scenery, recreation, and other values. What changes is the ability to consider the full range of lawful management options before deciding which option best fits the landscape.

For a State in which millions of National Forest acres fall within IRA boundaries, that authority matters enormously. Utah's forests need management capable of responding to a heavily visited Wasatch Front, active restoration on Monroe Mountain, motorized recreation and multiple-use demand on Fishlake, the distinct landscapes of Manti-La Sal and Ashley, changing wildlife habitat, rural economies, expanding wildland-urban interfaces, and wildfire conditions that can transform tens of thousands of acres in a matter of weeks. No single national prescription can adequately resolve all of those demands.

**UPLA therefore urges the Forest Service to select Alternative 2 and fully rescind the 2001 Roadless Area Conservation Rule.** The proper objective is neither maximum road construction nor maximum

roadlessness. It is a transportation and management system adapted to each National Forest's resource conditions, public uses, community needs, and long-term stewardship objectives.

Utah has experienced the limitations of managing diverse landscapes through categorical federal restrictions. We support returning these decisions to the level at which the landscape can actually be examined, the public can meaningfully participate, competing uses can be reconciled, and management can adapt when conditions change. That is not a retreat from conservation. It is the practical foundation for doing conservation, recreation, wildfire resilience, watershed management, and multiple use well.

### **RESCISSION RESTORES ACTIVE MANAGEMENT AS A FOREST-CONSERVATION TOOL**

UPLA supports selection of Alternative 2 and full rescission of the 2001 Roadless Area Conservation Rule because Utah's experience demonstrates that conservation is frequently accomplished through deliberate intervention, not through the indefinite exclusion of management activity. Across Utah's National Forests, some of the most consequential work to improve watershed condition, restore aspen, reduce hazardous fuels, recover wildlife habitat, protect native fisheries, control conifer encroachment, and increase resilience to wildfire is being accomplished through combinations of mechanical treatment, prescribed fire, commercial timber removal, seeding, grazing management, stream restoration, and sustained monitoring.

These projects expose a fundamental weakness in the philosophy underlying a national prohibition on road construction and reconstruction. The ecological condition of a forest is not determined by the absence of roads, nor is resource protection synonymous with minimizing human intervention. A forest can remain administratively "roadless" while experiencing severe conifer encroachment, declining aspen, insect mortality, excessive fuel accumulation, degraded habitat, altered fire regimes, or increasing vulnerability to stand-replacing wildfire. Conversely, an actively managed landscape can support functioning watersheds, diverse vegetation communities, native species, sustainable recreation, livestock grazing, and substantially greater resilience to disturbance.

UPLA therefore evaluates Alternative 2 through a practical conservation question: **Does the Forest Service have access to the complete set of lawful management tools necessary to improve the condition and resilience of Utah's National Forests?**

Under the existing Roadless Rule, the answer is unnecessarily constrained.

#### **A. Utah Has Already Demonstrated That Active Intervention Can Be the Conservation Action**

Perhaps no Utah project illustrates this principle more clearly than the Monroe Mountain Aspen Ecosystems Restoration Project on the Fishlake National Forest. Monroe Mountain has experienced a profound long-term decline in aspen. Project documentation reports that aspen canopy cover declined by more than 70%, representing a loss of 40,000 acres during the preceding 200 years. Rather than attempt to preserve the resulting condition, the Forest Service, State of Utah, private landowners, and other partners developed a landscape-scale restoration strategy intended to reverse it. By the completion of Phases 1 through 6, roughly 33,000 acres had been treated, and the project has continued through subsequent

phases using prescribed fire, mechanical conifer removal, commercial timber operations, seeding, fencing, and biological monitoring (Utah Watershed Restoration Initiative [WRI], 2023).

The current phases demonstrate the scale and sophistication of that work. Phases 10 through 12 propose improvement of roughly 15,100 acres through mechanical removal of conifers from aspen stands, commercial thinning, prescribed burning of 2,500 to 4,500 acres annually, pile burning, seeding, Dixie harrow treatments, and continued aspen and boreal toad monitoring. The broader Monroe Mountain project encompasses 175,706 acres of National Forest land and 11,805 acres of private inholdings, making restoration inherently a cross-boundary undertaking rather than an isolated federal treatment (WRI, 2026a). The ecological objectives are equally important. Earlier project phases identified restoration of fire-resilient aspen ecosystems, reduction of hazardous fuels, improvement of habitat for Bonneville cutthroat trout, boreal toad, northern goshawk, and flammulated owl, and greater structural and age-class diversity as explicit management goals (WRI, 2022). It is important to note that none of the actions or achievements would have been possible within an IRA.

In other words, mechanical treatment, timber removal, prescribed fire, access, and wildlife conservation are not competing objectives on Monroe Mountain. They are components of the same restoration strategy. That experience should inform the Forest Service's decision on Alternative 2. Where mechanical intervention, temporary access, road reconstruction, or transportation improvements are necessary to implement a scientifically supported restoration prescription, the environmental consequences of those actions should be compared with the consequences of failing to treat the landscape. The analysis should not begin with a national rule that restricts management tools before the resource problem has been fully examined.

## **B. Utah's Watershed Projects Demonstrate Why "Leave It Alone" Is Not a Universal Conservation Prescription**

The same principle is evident on the Dixie National Forest, where active management has been employed specifically to protect watersheds, native fisheries, wildlife habitat, and riparian systems. The Ranch Creek Watershed Improvement Project on the Escalante Ranger District encompasses a 14,071-acre project area in the Ranch Creek, Birch Creek, and Horse Creek subwatersheds. Forest Service and State project documentation identified conifer succession, excessive fuel loading, degraded riparian conditions, sediment concerns, and elevated risk of uncharacteristically severe wildfire as threats to watershed function and to a core conservation population of Bonneville cutthroat trout. Earlier phases treated more than 2,000 acres, prepared more than 450 additional acres for prescribed fire, constructed riparian exclosures, and rerouted an ATV trail out of a riparian area. Phase III then added 876 acres of mastication, 98 acres of lop-and-pile treatment, 72 acres of lop-and-scatter treatment, and placement of large woody material along 1.5 miles of Horse Creek (WRI, 2022b).

This is the kind of management UPLA supports.

The ATV reroute is particularly instructive. **The Forest Service did not have to choose between motorized recreation and watershed protection.** It identified the specific resource conflict, moved the

route away from the sensitive riparian area, restored the affected landscape, and retained recreation as part of the broader multiple-use system. **That is conservation through management.**

The same project simultaneously used mechanical vegetation treatment to reduce the probability of severe fire affecting native trout habitat. A regulatory philosophy that categorizes mechanical intervention, transportation infrastructure, and recreation access principally as environmental threats fails to capture how these tools are actually used by land managers.

The Utah Fire Amendment applicable to Utah National Forests reflects a similarly active approach. Forest Service project documentation on Dixie National Forest recognizes that long-term exclusion of fire contributed to uncharacteristically high fuel accumulation and directs the use of naturally ignited fire, prescribed fire, mechanical thinning, grazing, seeding, and other treatments to restore vegetation conditions and reduce threats to life, property, cultural resources, and forest ecosystems (WRI, 2020). The relevant policy lesson is broader than wildfire. Ecological systems change whether agencies manage them or not. Choosing not to intervene is itself a management choice, and it carries consequences.

### **C. Insect Mortality, Altered Fire Regimes, and Vegetation Succession Require Different Tools in Different Utah Forests**

Conditions on the Manti-La Sal National Forest provide another compelling example. The Manti-La Sal Healthy Forest Restoration Project addresses roughly 9,000 acres within the Huntington Creek, Straight Canyon, and Muddy Creek drainages in Sanpete, Emery, and Sevier Counties. The project combines hand treatments, mechanical treatment, commercial logging, prescribed fire, and aquatic restoration to address beetle mortality, departure from appropriate fire-return intervals, hazardous fuels, watershed condition, and wildlife habitat (WRI, 2022c).

The underlying forest-health problem is substantial. Project documentation reports that the North Zone of the Manti-La Sal experienced roughly 90% mortality in spruce stands during the early-2000s beetle epidemic, producing extensive hazardous fuel loading. The Forest Service identified the Seeley and Coal Hollow fires as examples of the consequences of vulnerable forest conditions within important watersheds. The restoration strategy includes commercial removal of hazardous fuels, reduction of subalpine fir, restoration of aspen and spruce, reduction of fuel continuity, and treatments intended to increase structural diversity and improve wildlife forage (WRI, 2022c).

A separate Skyline Healthy Forest Restoration Act project demonstrates the scale at which this work is now being contemplated. Between 2021 and 2024, the Manti-La Sal used project funding to support interdisciplinary environmental analysis of 40,721 acres of prescribed fire, mechanical thinning, and commercial harvest intended to reduce hazardous fuels and improve resilience to insects, disease, and high-intensity stand-replacing wildfire (WRI, 2024). The current Skyline effort continues that work. On the North Zone, the Forest Service identifies drought, insects and disease, fire suppression, dense vegetation, and accumulated fuels as conditions conducive to large fire growth and adverse effects to wildlife habitat, soils, hydrology, air quality, human uses, public safety, and firefighter safety (WRI, 2025).

These are not theoretical future risks. They are existing management conditions.

Nor can they be addressed through one treatment method. Some stands require prescribed fire. Others require mechanical removal before fire can be reintroduced safely. Commercial timber operations can offset treatment costs and remove accumulated biomass. Aspen restoration may require removal of encroaching conifers followed by disturbance sufficient to stimulate regeneration. Riparian areas may require targeted hand work. Wildlife objectives may require retention of particular stand structures while adjacent fuels are reduced. The conservation value lies in having the flexibility to select among those tools.

UPLA's objection to the Roadless Rule is therefore not founded upon an assumption that every IRA requires road construction or mechanical treatment. Rather, the Rule imposes a regulatory constraint that can prevent access or infrastructure from being considered even when such tools may be necessary to accomplish an otherwise desirable restoration objective. Alternative 2 removes that unnecessary constraint.

#### **D. Active Management Can Protect Wildlife, Water, Grazing Resources, and Recreation Simultaneously**

Utah's restoration record also demonstrates why active forest management should not be evaluated through a single-resource lens. On Monroe Mountain, prescribed fire and mechanical treatment are intended to regenerate aspen, reduce hazardous fuels, improve structural diversity, and benefit wildlife. On Ranch Creek, vegetation treatment is designed to protect a native Bonneville cutthroat trout population while improving upland and riparian conditions. On the Manti-La Sal, removal of excessive conifer density can improve watershed condition, increase wildlife forage, restore aspen, and reduce fire intensity.

These relationships matter in Utah because National Forest lands support interconnected uses and resources. A healthy aspen stand is simultaneously wildlife habitat, forage, watershed cover, scenic landscape, and a more fire-resilient vegetation community. A functioning road can simultaneously serve recreation, livestock administration, wildlife management, treatment crews, prescribed-fire operations, emergency response, and restoration. A strategically relocated motorized trail can retain recreational access while improving riparian function. Conservation outcomes therefore cannot be reliably inferred from the presence or absence of a road or from the presence or absence of mechanical treatment. The better metric is resource condition after management.

UPLA believes Alternative 2 better supports that outcome-oriented approach. If an existing route is contributing sediment to a stream, the Forest Service should be able to reconstruct or relocate it where doing so would reduce the impact. If heavy equipment is required to restore a watershed, remove hazardous material, construct an aquatic restoration feature, or implement a mechanical treatment, temporary access should be available for consideration. If no road is necessary, none should be built. The governing question should be what action produces the best long-term resource outcome under the applicable forest plan and environmental analysis.

### **E. Utah's Cross-Boundary Restoration Model Depends Upon Management Capacity, Not Regulatory Paralysis**

Utah has invested heavily in a model of conservation built around cooperation among federal and State agencies, counties, Tribes, private landowners, conservation organizations, grazing interests, recreationists, and other stakeholders. The Utah Watershed Restoration Initiative is a prominent example. Rather than treating forest, wildlife, watershed, fire, grazing, and recreation objectives as isolated programs, WRI coordinates projects across jurisdictional boundaries and combines funding and technical capacity from multiple partners. Monroe Mountain itself reflects that model, with Forest Service treatments coordinated with work on private and BLM lands.

Utah and the Forest Service strengthened that approach in January 2026 through a 20-year cooperative agreement for management of Utah's National Forests. The agreement expands the State's ability to contribute funding, staffing, contracting expertise, and technical support to Forest Service projects and builds upon the Shared Stewardship partnership established in 2018. Utah's Division of Forestry, Fire and State Lands describes the objective as accelerating landscape-scale work that improves watershed health, wildlife habitat, rangeland condition, and ecosystem resilience (Utah Division of Forestry, Fire and State Lands [FFSL], 2026).

This agreement is highly relevant to the Roadless Rule decision. Utah and the Forest Service are investing in institutional capacity specifically so that more conservation work can be accomplished on the ground. The federal government should not simultaneously retain a national regulatory structure that unnecessarily limits the management tools those partnerships may consider. The success of Shared Stewardship, Good Neighbor Authority, WRI, Joint Chiefs' Landscape Restoration Partnership projects, and similar efforts ultimately depends upon implementation. Planning a treatment does not improve a watershed. Funding a project does not regenerate an aspen stand. Completing environmental review does not remove hazardous fuels. Work must occur on the ground. That requires personnel, equipment, treatment access, transportation infrastructure where necessary, prescribed-fire preparation, follow-up maintenance, and the ability to adapt implementation when conditions change.

Alternative 2 better aligns Roadless policy with the collaborative management system Utah has spent years developing.

### **F. Management Access Must Be Evaluated as Part of the Conservation Equation**

UPLA recognizes that roads can produce environmental impacts. Roads can alter drainage, contribute sediment, fragment habitat, facilitate invasive species, and create additional opportunities for human-caused wildfire ignition when improperly located, designed, maintained, or used. Those concerns warrant analysis and mitigation. They do not justify treating roads as environmentally adverse in every management context.

Peer-reviewed analysis of Forest Service wildfire records from 1992 through 2024 found greater ignition density near roads, particularly for human-caused fires, but also found that fires originating near roads were substantially smaller on average than fires originating within IRAs and Wilderness. The authors

identified greater detection and suppression access, fuel discontinuities, and availability of roads for fire-control operations among the explanations for the observed size relationship, while cautioning against interpreting roads as an uncomplicated wildfire-management solution (Aplet et al., 2026).

UPLA agrees with that caution. The relevant policy question is not whether roads are universally beneficial or universally harmful. It is whether a particular transportation feature provides sufficient management, public-safety, recreation, or restoration value to justify its site-specific effects, and whether those effects can be avoided, minimized, or mitigated.

Utah's own restoration projects demonstrate why that evaluation cannot be made abstractly. A road used to reach a mechanical treatment on Monroe Mountain serves a different function from an unnecessary duplicate route. Access supporting watershed restoration on the Manti-La Sal must be evaluated differently from unmanaged cross-country travel. A reroute that moves an ATV trail away from a riparian corridor on Dixie National Forest can produce a conservation benefit precisely because managers retain the ability to redesign the transportation system.

The law should permit those distinctions. Alternative 2 does.

#### **G. Rescission Would Align Roadless Policy with Utah's Existing Forest-Restoration Direction**

UPLA also supports Alternative 2 because full rescission would remove a policy inconsistency that has become increasingly difficult to justify. Congress, the Forest Service, and the State of Utah are investing substantial resources in accelerating vegetation management, fuels reduction, watershed restoration, and cross-boundary forest treatment. The Healthy Forests Restoration Act provides authorities for hazardous-fuels reduction and forest-health projects, particularly where communities and watersheds face wildfire risk. Utah's Shared Stewardship program and WRI have developed a mature State-federal framework for translating those objectives into projects on the ground. The 2026 twenty-year cooperative agreement further expands Utah's capacity to help implement National Forest restoration.

Meanwhile, the Roadless Rule retains a national regulatory structure developed in 2001 that restricts road construction and reconstruction irrespective of whether access is necessary to accomplish a contemporary restoration objective.

Those policies point in different directions.

Alternative 2 resolves the conflict without establishing a mandate for road development or timber production. Rescission would not determine that Monroe Mountain should receive another treatment, that a particular Manti-La Sal road should be reconstructed, or that mechanical treatment should occur within a particular IRA. Those decisions would remain subject to applicable forest plans, environmental review, resource protections, and project-specific analysis. What rescission would accomplish is more fundamental: it would allow those decisions to be made on their ecological and operational merits rather than first requiring them to overcome a separate nationwide prohibition. Conservation policy should reward measurable improvements in forest and watershed condition, not simply the absence of management activity.

Utah's experience provides ample evidence of what that principle looks like in practice. Monroe Mountain's declining aspen are being restored through mechanical treatment and fire. Manti-La Sal watersheds affected by insect mortality and altered forest structure are being treated through combinations of timber removal, prescribed fire, and restoration. Ranch Creek demonstrates that native fisheries, watershed health, and motorized recreation can be accommodated through targeted vegetation work and intelligent route relocation rather than broad exclusion. Utah's State-federal partnerships demonstrate that conservation can be accelerated when agencies share resources and implementation capacity. These are not departures from conservation. They are conservation being performed.

UPLA therefore urges the Forest Service to select Alternative 2 and fully rescind the 2001 Roadless Area Conservation Rule. Forests are dynamic systems. Their vegetation changes, fires occur, insects spread, watersheds respond to disturbance, recreation patterns evolve, and management needs shift over time. Federal policy must retain enough flexibility to respond to those realities. For Utah, the better measure of stewardship is not how successfully managers can keep equipment out of a landscape. It is whether the landscape remains ecologically functional, resilient to disturbance, accessible for legitimate multiple uses, and capable of sustaining the watersheds, wildlife, communities, recreation opportunities, and working lands that depend upon it. Where active management is necessary to accomplish those objectives, federal policy should enable the work rather than stand in its way.

### **WILDFIRE, EMERGENCY RESPONSE, AND COMMUNITY PROTECTION**

UPLA supports selection of Alternative 2 and full rescission of the 2001 Roadless Area Conservation Rule because wildfire policy must account for what happens when a fire escapes initial attack and begins moving across jurisdictional boundaries toward communities, municipal watersheds, recreation corridors, utilities, private inholdings, and other public infrastructure. At that point, transportation access is no longer merely a question of recreational convenience or forest-management efficiency. It becomes part of the operational system through which firefighters, law enforcement officers, emergency managers, utility crews, equipment, residents, and ultimately recovery personnel move through the landscape.

Utah's geography makes this issue particularly consequential. National Forest lands form the mountainous headwaters surrounding many Utah communities and reservoirs. Forest roads connect remote recreation areas, grazing allotments, private inholdings, cabins, municipal watersheds, campgrounds, trailheads, hunting areas, and communities to State and county transportation networks. Major wildfires routinely cross ownership boundaries among National Forest System lands, State lands, private property, and other federal jurisdictions. The result is a public-safety environment in which transportation redundancy, road condition, access to water and utilities, communications, and the ability to move personnel rapidly across large landscapes can directly affect emergency operations.

UPLA does not contend that roads prevent wildfire. They plainly do not. Nor do we advocate construction of roads throughout Inventoried Roadless Areas under the generalized theory that more roads necessarily produce greater public safety. Our position is narrower and grounded in Utah's experience: **where transportation access materially contributes to suppression, evacuation, emergency response,**

**protection of critical infrastructure, or post-fire stabilization, federal policy should not unnecessarily foreclose that access before the operational need has been evaluated.**

Alternative 2 restores the Forest Service's ability to make that evaluation.

#### **A. The Brian Head Fire Demonstrates the Scale at Which a National Forest Fire Can Become a Community Emergency**

The 2017 Brian Head Fire provides one of Utah's clearest examples of the intersection between National Forest wildfire, community protection, transportation, watershed security, wildlife habitat, and post-fire recovery. The fire began near the Town of Brian Head on June 17, 2017, and ultimately burned 71,672 acres, including 63,648 acres of National Forest System land, 749 acres of BLM land, 761 acres of State land, and 6,514 acres of private property. Burn-severity analysis identified 31,819 acres of moderate severity and 11,639 acres of high severity. More consequentially for post-fire public safety, 54,275 acres were classified as having high soil-erosion hazard and 27,549 acres contained hydrophobic soils, conditions capable of dramatically increasing runoff, erosion, and debris movement following precipitation (Utah Watershed Restoration Initiative [WRI], 2018a).

The fire's footprint extended from the Brian Head area through Parowan Canyon, south toward Highway 143, east toward Panguitch Lake, and north into Upper Bear Valley. The response required coordination among federal, State, county, and local fire organizations. Local fire-district records from the incident describe structure-protection assignments in the Panguitch Lake area and coordination with neighboring communities for potential evacuation sheltering (Cedar Mountain Fire Protection District, 2017).

The public-safety consequences did not end when the active fire was contained. The fire burned portions of the watershed associated with Panguitch's municipal water supply and created extensive post-fire erosion concerns. Forest Service and State restoration planning anticipated that elevated watershed response could cause failures of existing roads and trails, potentially requiring future rerouting. The project record specifically identifies additional road and trail rerouting as a foreseeable response where post-fire runoff rendered pre-fire alignments unstable (WRI, 2018b). This sequence is instructive.

Before a fire, transportation infrastructure can provide access to communities, recreation areas, watersheds, and management units. During the incident, that same system may become part of the structure-protection and emergency-response network. After the fire, roads and trails themselves can become threatened resources requiring reconstruction or relocation because the hydrology of the surrounding landscape has fundamentally changed.

The Roadless Rule is poorly suited to that continuum because it evaluates road construction and reconstruction principally through the preservation of roadless characteristics. Emergency management requires a broader inquiry. The relevant question that must be confronted is: is the transportation system adequate for the public-safety and resource-protection functions the landscape actually requires?

#### **B. Utah's Rural Geography Makes Transportation Redundancy a Legitimate Life-Safety Consideration**

Wildfire evacuation in Utah does not occur exclusively along multilane highways serving densely populated communities. Many National Forest landscapes are reached through narrow mountain roads, canyon corridors, Forest Service routes, and small State highways that may provide only one or two practical connections to the broader transportation network. Those conditions create vulnerability when wildfire, falling trees, debris, equipment operations, smoke, or post-fire flooding compromises a primary route.

The 2024 Yellow Lake Fire on the Uinta-Wasatch-Cache National Forest demonstrates the operational problem. During a period of red-flag conditions characterized by high winds, record temperatures, extremely low humidity, and unseasonably dry conditions, the fire produced wind-driven spot fires that crossed State Route 35 and a gas pipeline and established in timber north of the highway. As the fire moved northeast, Duchesne County began considering evacuation planning under Utah's Ready, Set, Go framework (National Wildfire Coordinating Group [NWCG], 2024). The Yellow Lake Fire ultimately burned more than 33,000 acres across Duchesne Ridge, affecting the headwaters of both the Provo and Duchesne River systems. Highway 150 borders the northern portion of the affected landscape, while Highway 35 passes through its southern portion (WRI, 2026a).

That geography matters. State highways may provide the principal regional corridors, but Forest roads provide the secondary network through which firefighters reach divisions of an incident, recreationists leave dispersed areas, administrative personnel inspect infrastructure, and post-fire teams reach damaged watersheds. UPLA therefore urges the Forest Service to recognize **network redundancy** as a legitimate consideration when evaluating transportation within IRAs. Redundancy means that the agency should be permitted to evaluate whether maintaining, reconstructing, or strategically connecting a route could provide meaningful emergency value where a landscape otherwise depends upon limited ingress and egress. Alternative 2 allows that question to be answered through site-specific analysis rather than through a national presumption against road construction and reconstruction.

### **C. Utah's Watersheds and Water Infrastructure Are Public-Safety Assets**

Wildfire protection in Utah cannot be separated from water. Many National Forest landscapes form the headwaters of river systems supplying municipal water, irrigation, fisheries, reservoirs, and downstream communities. Severe wildfire can alter those systems almost immediately by removing vegetation, creating hydrophobic soils, increasing runoff, destabilizing channels, mobilizing sediment, and sending debris into culverts, roads, reservoirs, and water infrastructure.

The Dollar Ridge Fire demonstrates the scale of this secondary emergency. The 2018 fire burned most of the Strawberry River corridor within an affected landscape of roughly 70,000 acres. Intense rainfall following the fire in 2018 and 2019 produced severe flooding that damaged the river corridor and impaired road access. In response, Duchesne County used Natural Resources Conservation Service Emergency Watershed Protection funding to reestablish access to upstream property owners and reconstruct portions of the road so they could better withstand future flood events (WRI, 2022a).

Subsequent restoration did not treat road access as separate from watershed recovery. Crews reconstructed the road used by hunters and anglers, raised portions of the roadway, armored bends with riprap, and rerouted sections away from the stream bottom where feasible. They simultaneously installed structures intended to slow debris flows and restored riparian and upland vegetation (WRI, 2022a). Later phases document an even larger public investment. Duchesne and Wasatch Counties obtained roughly \$18 million in Emergency Watershed Protection funding for road reconstruction in the fire-affected Strawberry River corridor. Project documentation expressly identifies restoration of road access as beneficial to subsequent river and fisheries restoration because managers could again reach the corridor (WRI, 2025a).

This example deserves careful consideration in the Roadless Rule decision because it exposes the artificiality of treating roads and environmental protection as inherently competing interests. Following Dollar Ridge, rebuilding access was part of environmental recovery. The reconstructed road served property access and recreation, but it also allowed restoration personnel to reach the river corridor. Engineering improvements were used to move portions of the route away from the stream bottom and make the remaining infrastructure more resilient to future flooding. Road reconstruction, watershed protection, public access, and fisheries restoration became interdependent objectives.

UPLA sees no defensible reason to retain a national regulatory structure that could make comparable solutions more difficult merely because a future emergency occurs within an IRA.

#### **D. Post-Fire Damage Can Eliminate Public Access for Years**

Utah also provides direct evidence that wildfire-related access losses can persist long after an incident disappears from national headlines. On the Uinta-Wasatch-Cache National Forest, the Blackhawk area has remained closed following damage associated with the 2018 Pole Creek and Bald Mountain fires. A Forest Service closure order issued in May 2025 states that Blackhawk Campground had remained closed since 2018 because of fire impacts, including hazard trees with weakened root systems, and that reconstruction of campground infrastructure would begin in 2026. The order closed the campground, roads, trailhead and parking areas, and trails through October 31, 2026. That is an eight-year access consequence from the original fires to the scheduled expiration of the current order.

The significance extends beyond a single campground. Wildfire can damage road surfaces, bridges, culverts, drainage structures, trailheads, campsites, utility systems, signs, retaining structures, and surrounding trees. Burned root systems can leave apparently standing trees unstable for years. Post-fire runoff can damage infrastructure that survived the flames. Reconstruction competes for limited federal funding and staff capacity. Consequently, the public can lose use of a landscape long after active suppression ends.

This is particularly important to UPLA because discussions of public access often focus only upon the acreage or route mileage directly affected by a management decision. Wildfire operates differently. A single damaged road can sever access to an entire destination. A closed campground access road can eliminate the public's practical ability to use surrounding recreation infrastructure. A failed culvert or

bridge can isolate miles of otherwise undamaged road and trail. For that reason, transportation resilience should be considered before an emergency occurs, not merely funded afterward.

### **E. Fire Closures Demonstrate How Rapidly Recreation Infrastructure Can Become Emergency Infrastructure**

UPLA supports legitimate temporary closures during active wildfire and suppression operations. Firefighters should not be forced to contend with recreational traffic in an operational area, and the public should not be exposed to unstable trees, heavy equipment, active fire, aircraft operations, or rapidly changing fire behavior. Utah's recent incidents nevertheless illustrate how quickly public recreation infrastructure becomes part of the emergency-response landscape.

During the 2025 Buckley Draw Fire on the Pleasant Grove Ranger District of the Uinta-Wasatch-Cache National Forest, the Forest Service closed an area bounded in part by Kyhv Peak Road, Forest Service Road 70027, along with Slate Canyon Trail, Maple Flat Trail, Kyhv Peak Connector Trail, Knight Spring Trail, Boardman Spring Trail, Lime Kiln Trailhead, and the Bonneville Shoreline Springville Trailhead. The agency expressly stated that the closure was necessary for public safety during continued suppression and suppression-repair operations (USFS, 2025b). This is precisely why UPLA does not treat recreation access and emergency management as separate policy categories. The same roads and trail systems that serve OHV users, hunters, anglers, campers, mountain bikers, equestrians, and hikers during normal conditions become the geography through which emergency closures are defined and suppression repair is performed. When those transportation systems are maintained and functional, they provide options. When they are damaged, abandoned, or incapable of supporting operational use, those options diminish.

Utah's National Forest recreation network is extensive. Ashley National Forest alone reports **1,151 miles of roads and trails available for ATV travel**, in addition to campgrounds, trailheads, fishing access, and other dispersed recreation infrastructure (USFS, n.d.). UPLA has consistently advocated maintaining legitimate motorized routes not merely because they provide recreational opportunity, but because an accessible public-land system supports hunting, wildlife management, grazing administration, volunteer stewardship, search and rescue, law enforcement, fire operations, and other functions that do not fit neatly into a single program category. Wildfire makes those overlapping functions impossible to ignore.

### **F. Emergency Stabilization Requires Access During the Narrow Window When Action Matters Most**

The operational need for transportation often becomes more acute immediately after containment. Post-fire landscapes can experience a rapid transition from fire emergency to flood, erosion, debris-flow, and infrastructure emergency. The first substantial precipitation event may arrive before agencies have completed all desired stabilization work. Culverts can plug with burned woody material. Drainages can reactivate. Roads can wash out. Slopes can fail. Sediment can enter reservoirs and municipal watersheds.

The Yellow Lake Fire Burned Area Emergency Response assessment illustrates this problem. The Forest Service identified roads and bridges in and downstream from burned areas as being at risk from post-fire conditions, particularly where floatable debris could obstruct culverts, bridges, and other channel

infrastructure. Once those structures become blocked, water can overtop roads, causing substantial damage and restricting access. The BAER team identified measures including protecting culvert inlets with riprap and removing large floatable debris to reduce those risks (USFS, 2024).

The Brian Head Fire produced comparable concerns on a much larger scale. Of the 71,672 acres burned, 54,275 acres were identified as having high erosion hazard and 27,549 acres contained hydrophobic soils. Restoration planning recognized the potential for elevated runoff to damage roads and trails and specifically contemplated future rerouting where existing alignments became untenable (WRI, 2018a, 2018b).

Dollar Ridge then demonstrated what those projections look like when they materialize. Severe post-fire flooding damaged the Strawberry River corridor, necessitating substantial road reconstruction and erosion-control work before durable public and restoration access could be reestablished (WRI, 2022a).

The common thread is time. Emergency stabilization cannot always wait for ideal administrative circumstances. Where a culvert threatens to fail, a road is being undermined, a municipal watershed faces debris loading, or crews need access to stabilize a drainage before seasonal storms arrive, agencies need the legal and operational ability to respond. Alternative 2 does not eliminate environmental review requirements or authorize unnecessary construction. It removes a separate categorical constraint that can be poorly matched to the urgency and complexity of post-fire emergency conditions.

### **G. Utah's Interagency Fire Model Depends Upon Functional Access Across Jurisdictional Boundaries**

Utah's wildfire-response system is inherently intergovernmental. Wildfire does not remain within the jurisdiction where it starts. Brian Head crossed National Forest, BLM, State, and private lands. Dollar Ridge affected federal, State, county, and private interests throughout the Strawberry River corridor. Yellow Lake crossed a major State highway and affected watersheds spanning the Uinta-Wasatch-Cache and Ashley National Forests. Local fire departments, county sheriffs, emergency managers, the State of Utah, Forest Service, BLM, and other agencies routinely operate within the same incident organization.

Transportation infrastructure must function across those same boundaries. A Forest Service road that terminates at a county road does not cease to have emergency value because its administrative jurisdiction changes. A route used by a rancher, hunter, or OHV recreationist during normal conditions may become an access point for a Type 6 engine, law-enforcement officer, utility crew, or search-and-rescue team during an emergency. A road reconstructed after fire may simultaneously restore access to private property, fisheries, recreation, and federal restoration projects.

UPLA therefore urges the Forest Service to evaluate transportation infrastructure according to the **system it serves**, rather than exclusively according to the administrative classification of the acreage through which one segment passes. That approach is particularly important in Utah, where National Forest boundaries frequently contain private inholdings and adjoin State, county, and other federal lands. Full rescission under Alternative 2 would permit the Forest Service to consider whether a transportation improvement inside an IRA contributes to a larger emergency-response or community-protection

network. The agency could then weigh that value against site-specific resource impacts under the governing forest plan and applicable environmental law. That is a more rational public-safety framework than categorical exclusion.

## **H. Community Protection Includes the Ability to Recover After the Fire**

UPLA also urges the Forest Service to recognize that community protection does not end when evacuation orders are lifted. Wildfire recovery can require years of public investment. Dollar Ridge is a particularly compelling example. Post-fire flooding damaged the Strawberry River corridor so extensively that counties secured roughly \$18 million for road reconstruction. Subsequent restoration phases have continued addressing river morphology, fisheries, erosion, and watershed function. Current project documentation notes that the rebuilt road restored access to the corridor and that additional landscape and stream recovery would not occur within an acceptable timeframe without continued intervention (WRI, 2025a).

The ecological consequences were equally severe. Project records state that the Dollar Ridge Fire effectively eliminated the fish assemblage from Soldier Creek Dam downstream to the Strawberry Pinnacles, encompassing essentially the entire fishable trout-stream reach. Restoration has proceeded only as the watershed, access system, and surviving fish population recovered sufficiently to support additional work (WRI, 2026b).

Post-fire infrastructure and ecological recovery therefore cannot be cleanly separated. The road must be repaired so crews can reach the river. The river must be stabilized so subsequent floods do not destroy the road again. Vegetation must recover to reduce sediment delivery. Fisheries restoration depends upon water quality and channel stability. Hunters and anglers regain access as the same system becomes functional. This is the practical reality UPLA believes federal policy should accommodate. The Roadless Rule's conceptual focus on preserving roadless characteristics is poorly equipped to address a landscape where reconstruction itself may become necessary to restore both ecological function and public access after disaster.

## **I. Alternative 2 Provides the Better Framework for Public Safety**

Active stewardship requires balanced management. Therefore we do not assert that the Forest Service should designate every existing road as emergency infrastructure or to justify new construction through speculative wildfire benefits. Public-safety claims should be supported by evidence. Where emergency value is asserted, the Forest Service should consider factors including:

- connectivity to State, county, and other National Forest System roads;
- access to communities, private inholdings, recreation residences, campgrounds, and developed sites;
- ingress and egress limitations;
- firefighter and emergency-vehicle operability;
- access to municipal watersheds, communications facilities, utilities, dams, reservoirs, and other critical infrastructure;
- value for suppression staging, patrol, contingency lines, or evacuation;

- susceptibility of the route to post-fire flooding, debris flow, or hazard-tree impacts; and
- whether reconstruction, relocation, drainage improvement, or another mitigation could improve both environmental performance and emergency reliability.

This is the kind of site-specific analysis Alternative 2 makes possible.

Utah's wildfire history provides little justification for retaining a nationwide prohibition that can restrict road construction or reconstruction before these considerations are weighed. Brian Head demonstrates the potential for a National Forest fire to become a multi-jurisdictional community emergency and municipal-watershed threat. Dollar Ridge demonstrates how wildfire can destroy both ecological resources and the access infrastructure required to restore them. Yellow Lake demonstrates how quickly fire can cross major transportation and utility corridors and trigger evacuation planning. Blackhawk demonstrates that recreational access lost to wildfire can remain unavailable for the better part of a decade. These are materially different circumstances, but they support the same conclusion. **Access is an element of emergency preparedness.** It should be managed intelligently, engineered responsibly, and limited where environmental costs outweigh operational benefits. But it should not be categorically disfavored by a national regulation where lives, communities, watersheds, infrastructure, and long-term recovery may depend upon the ability to reach a landscape.

UPLA therefore urges the Forest Service to select Alternative 2 and fully rescind the 2001 Roadless Area Conservation Rule. Utah has invested heavily in interagency wildfire response, Shared Stewardship, watershed restoration, emergency preparedness, and cross-boundary land management. Those efforts require federal land managers to possess the flexibility to maintain a transportation network responsive not only to ordinary recreation and resource-management needs, but also to the extraordinary conditions created by wildfire. When the emergency comes, the question is no longer whether a line on a map was intended to remain roadless. The question is whether firefighters can get in, whether people can get out, whether critical infrastructure can be protected, and whether agencies can return afterward to repair what the fire left behind. Federal policy should preserve the Forest Service's ability to answer those questions before the flames make the decisions for us.

### **MOTORIZED RECREATION AND PUBLIC ACCESS**

UPLA supports selection of Alternative 2 and full rescission of the 2001 Roadless Area Conservation Rule because Utah's National Forest transportation system is not merely a collection of roads crossing federal acreage. It is an interconnected recreation network linking mountain landscapes with trailheads, campgrounds, hunting areas, lakes, historic sites, county roads, State highways, neighboring federal lands, and rural communities whose identities and economies are closely tied to outdoor recreation.

For motorized users, the practical value of that system depends upon connectivity. An isolated road segment does not provide the same recreational opportunity as a route that completes a loop. A trail that terminates before reaching the next community does not function like one that permits a rider to travel legally from town to town. A route open to motorcycles and 50-inch ATVs does not necessarily provide access to families using modern side-by-sides. A road shown as available on a map may provide little

meaningful public access if the adjoining connection needed to reach it cannot be reconstructed, relocated, or designated.

This distinction is especially significant in Utah, where motorized recreation has developed around large, interconnected systems rather than isolated riding areas. The Paiute, Arapsee, and Great Western Trail systems are prominent examples. These networks connect National Forest System roads and trails with county roads, State routes, BLM lands, trail towns, campgrounds, dispersed recreation areas, and other public lands. Utah has deliberately invested in this model because it allows visitors to experience large landscapes while directing motorized use onto managed routes. The Roadless Rule can work against that objective when its road-construction and reconstruction prohibitions prevent land managers from considering a short connection, sustainable relocation, or other transportation improvement necessary to make the larger network function. Alternative 2 would remove that structural impediment.

#### **A. Utah's Trail Systems Demonstrate Why Connectivity Matters More Than Raw Mileage**

The Paiute Trail system on the Fishlake National Forest provides one of the clearest examples of how recreational value is created through connectivity. Changes to the Fishlake motorized transportation system expressly considered converting several existing trails from a 50-inch width limitation to a 60-inch limitation. The reasons given by the Forest Service were not simply to increase motorized mileage. They were to make the system work better. For Paiute Route 01 at Merchant Creek/Three Creeks, widening 0.8 mile would create a large loop opportunity for side-by-side OHVs. Converting 3 miles of Route 070 would provide additional side-by-side opportunity. Widening 1.1 miles of PST05 at Three Creeks would provide a legal connection for side-by-sides traveling from Marysville to Beaver. Another 2.15-mile conversion on Paiute Route 01 in Wade's Canyon would create a large loop and provide a connection into Circleville, allowing vehicles 60 inches wide or less to complete the Paiute loop (USFS, 2026a).

These are small mileage changes with disproportionately large recreational consequences. A 1.1-mile segment can determine whether a visitor can legally travel between two Utah communities. A 2.15-mile segment can determine whether an entire vehicle class can complete a major recreation loop. That is why UPLA cautions against evaluating motorized access primarily through total route mileage. **Connectivity has value independent of mileage.**

The same principle applies when evaluating roadless-area management. A short segment crossing an IRA may connect hundreds of miles of otherwise usable roads and trails. Preventing construction, reconstruction, or relocation of that segment can affect recreational opportunity far beyond the acreage physically occupied by the road. Alternative 2 would allow the Forest Service to evaluate those network consequences directly.

#### **B. Utah Has Chosen Managed Motorized Networks as a Recreation Strategy**

Utah's public-land recreation system has not developed around unlimited cross-country vehicle use. It increasingly depends upon designated routes, signed trail systems, staging areas, maps, width restrictions, seasonal limitations, maintenance programs, education, and partnerships among federal agencies, the

State, counties, municipalities, clubs, and volunteers. That model requires a functional transportation network.

The Ashley National Forest, for example, manages 1.3 million acres containing 1,151 miles of roads and trails available for ATV use, together with 1,156 campsites and extensive fishing, camping, scenic-driving, hunting, and other recreation opportunities (USFS, 2026b). The Arapeen Trail system on the Manti-La Sal National Forest provides another example. Forest Service recreation information describes individual loops in which motorized trails connect with Forest roads and Skyline Drive to create rides extending dozens of miles. The Joes Valley Loop alone is a 35-mile route combining Reeder Trail, Reeder Ridge Road, Skyline Drive, Ephraim-Orangeville Road, and other designated segments. Different approaches are identified for vehicles above and below 50 inches in width (USFS, 2024). The Great Western Trail similarly demonstrates the importance of cross-jurisdictional connectivity. In central Utah, the multiple-use corridor moves between Forest Service and BLM lands, passes from Fishlake National Forest on Thousand Lake Mountain toward Torrey, and then continues along county-road and BLM segments. Motorized and nonmotorized uses are accommodated together in some portions of the corridor and separated where appropriate in others (Bureau of Land Management [BLM], 2026).

These systems represent a mature form of multiple-use recreation management. Different uses can be separated where resource or user conflicts warrant separation, combined where shared use is appropriate, and connected through roads and trails that cross jurisdictional boundaries. A national policy that unnecessarily restricts the agency's ability to adjust that network can undermine the very designated-route model federal agencies otherwise encourage.

### **C. The Relevant Measure Is Whether the Public Can Reach the Opportunity**

The Roadless Rule debate often treats public access as an acreage question. UPLA does not believe acreage alone provides a meaningful measure. A person cannot recreate on an acre merely because no regulation expressly prohibits that person's presence there. The visitor must have a practical means of reaching the destination. For an individual seeking a remote campsite, hunting area, mountain lake, scenic overlook, historic site, or backcountry trailhead, the meaningful unit of access is frequently the road or trail that reaches it. Remove that route and the surrounding acreage may remain legally "public" while becoming practically inaccessible to anyone unable to travel substantial distances on foot.

The effect is magnified in Utah because National Forest recreation frequently occurs across large landscapes at substantial elevation and considerable distance from developed communities. The Ashley National Forest's 1,151 miles of ATV-accessible roads and trails are valuable not because they occupy 1,151 linear miles on a map, but because they allow people to reach dispersed destinations across a 1.3-million-acre forest (USFS, 2026b). Likewise, the Paiute system's value lies in its ability to connect communities and create loops. The Great Western Trail derives part of its significance from connecting different ownerships and landscapes. Arapeen routes combine trails and roads into destination rides across the Wasatch Plateau.

UPLA therefore urges the Forest Service to analyze recreation under Alternative 2 according to functional access, including:

- destination access;
- loop opportunities;
- connections among trail systems;
- community-to-community connectivity;
- access across jurisdictional boundaries;
- vehicle-width compatibility;
- access to dispersed camping and trailheads;
- hunting and fishing access;
- connectivity to county and State transportation systems; and
- accessibility for visitors whose physical abilities make nonmotorized backcountry travel impracticable.

Those measures reveal recreational consequences that an acreage or route-mile total can conceal.

#### **D. Changing Vehicle Technology Makes Adaptive Transportation Management Increasingly Necessary**

Utah's motorized recreation landscape has also changed materially since the Roadless Rule was promulgated in 2001. Modern side-by-side vehicles have become a major component of Utah OHV recreation. Many are wider than the traditional 50-inch ATV standard around which older trail systems were designed. Utah law also permits qualifying Type I and Type II ATVs to be modified for street-legal operation, allowing appropriately equipped OHVs to travel on designated public highways and thereby connect trail systems with communities and services (Utah Division of Outdoor Recreation [UDOR], 2026a).

The Fishlake National Forest's proposed route changes illustrate the resulting management need. The Forest Service has considered converting existing 50-inch routes to 60-inch routes specifically to provide side-by-side loop opportunities and legal connections among Marysvale, Beaver, Circleville, and the broader Paiute system (USFS, 2026a). This is precisely what adaptive recreation management should look like. We are not suggesting that every narrow trail should be widened. Many routes should remain motorcycle or narrow-ATV trails because their terrain, environmental conditions, desired recreation setting, or engineering characteristics make that designation appropriate. But a transportation system designed around conditions that existed decades ago must be capable of adaptation. Where a short widening, relocation, reconstruction, or new connection can accommodate contemporary vehicle classes without unacceptable resource impacts, the Forest Service should be able to evaluate that option on its merits.

The Roadless Rule can constrain that flexibility where the necessary action constitutes road construction or reconstruction within an IRA. Alternative 2 would allow the agency to consider contemporary recreation demand rather than permanently binding transportation decisions to the physical configuration inherited from an earlier era.

#### **E. Road Reconstruction and Trail Maintenance Are Part of Keeping Access Sustainable**

Motorized access cannot survive indefinitely without maintenance. Utah recognizes this reality through substantial State and local investment in trail infrastructure. The Utah OHV Recreation Grant program has funded projects involving trail maintenance, signage, brushing, rock removal, tread repair, water diversion, cattle guards, barriers, bridges, equipment acquisition, mapping, and reopening routes blocked by natural events.

One Fishlake National Forest grant project funded maintenance and management across the Paiute, Great Western, Gooseberry, and associated trail systems, including signage, logging, brushing, rock removal, tread repair, water diversion, cattle guards, barriers, bridges, and maintenance of existing structures across 24 trails and trailheads. The project carried a total value of \$182,500, including \$90,000 in State grant funding (UDOR, 2020). Another State-funded project provided \$40,000 toward a \$45,000 effort to remove major rockslides that had closed access to the Big Ridge ATV Network from North Hatch Canyon. Garfield County separately received funding for specialized trail-development and maintenance equipment (UDOR, 2020).

These investments demonstrate a principle central to UPLA's position: keeping a route open responsibly often requires intervention. Drainage structures fail. Rockslides occur. Vegetation encroaches. Floods damage tread. Culverts require replacement. Vehicle technology changes. Poorly located segments may need relocation. Bridges age. Natural disturbances alter the landscape. If federal policy makes reconstruction or relocation more difficult than closure, it creates a structural bias toward attrition of the motorized network. UPLA rejects that outcome.

When a legitimate route develops a resource or engineering problem, the first question should be whether the problem can be repaired. Where repair in the existing location is environmentally undesirable, managers should evaluate relocation. Where a short alternative alignment avoids a wetland, stream, unstable slope, wildlife concern, or private-property conflict, that solution should remain available. Closure should not become the default simply because federal regulations have removed better engineering solutions from consideration.

#### **F. Access for People with Disabilities Is Especially Significant in Utah's Roadless Debate**

For UPLA, motorized access is also an accessibility issue, and this concern is not theoretical. UPLA has made accessibility a major component of its public-land advocacy because a road closure affects people differently depending upon their physical ability. An able-bodied visitor may respond to a closure by walking farther. A person with a mobility limitation may lose the destination entirely. This issue has become sufficiently consequential that Utah's congressional delegation is advancing legislation specifically intended to address it.

The Outdoor Americans with Disabilities Act, S. 2968, introduced by Senator Mike Lee and cosponsored by Senator John Curtis, would establish a measurable motorized-access standard for certain federal public lands and require federal land managers to incorporate accessibility into travel-management decisions. UPLA has actively supported development and advancement of this legislation and has worked to elevate the experiences of people who depend upon Jeeps, trucks, UTVs, ATVs, and other motorized vehicles to experience public lands (Outdoor Americans with Disabilities Act, 2025; UPLA, 2026). The legislation

proposes a standard under which disability-accessible public land would generally contain at least 2.5 miles of authorized road accessible to motorized vehicles or off-road vehicles per square mile. It would also require consideration of alternative access when qualifying routes are closed and greater coordination with State, county, local, and Tribal governments.

There is, however, a particularly relevant limitation for this rulemaking. As currently introduced, S. 2968 excludes Inventoried Roadless Areas from the lands subject to its proposed accessibility standard (Outdoor Americans with Disabilities Act, 2025). That exclusion has substantial implications in Utah. As discussed elsewhere in our comment letter... 49%... nearly half of Utah's National Forest System acreage is classified as IRA. If the Roadless Rule remains in place, those lands would remain outside the proposed motorized-access protections of S. 2968 even if Congress enacts the bill in its present form. The result exposes a significant policy conflict.

Federal lawmakers are considering legislation recognizing that road density and motorized connectivity can determine whether people with disabilities meaningfully access public lands, while the Roadless Rule preserves a regulatory structure that restricts construction and reconstruction of precisely that infrastructure across extensive National Forest acreage. Alternative 2 would help resolve that inconsistency.

Rescission would not automatically make every former IRA subject to S. 2968. That would depend upon the legislation ultimately enacted and its definitions. But removing the underlying IRA regulatory classification would eliminate one substantial categorical barrier between Utah's National Forest lands and a developing federal policy that treats motorized access as an accessibility concern rather than merely a recreational preference.

#### **G. Utah's Trail Towns Demonstrate That Motorized Access Connects Public Lands with Communities**

Utah's motorized recreation system is also distinctive because many trail networks deliberately connect public lands with rural communities. The Paiute system's connections to Marysvale, Beaver, and Circleville are not incidental. They are part of the recreational experience and part of the economic relationship between public lands and neighboring towns. Street-legal OHVs can further integrate trail systems with Utah communities where local and State law permits their operation. Riders can leave public-land routes, enter communities for fuel, lodging, food, repairs, supplies, and other services, and return to the trail system without trailering their machines between destinations (UDOR, 2026a).

That connectivity distributes recreation benefits beyond developed federal recreation sites. It also means that a strategically located route segment can have consequences beyond the federal parcel through which it passes. A broken connection may eliminate a loop that once brought visitors into a community. A width restriction may prevent an increasingly common vehicle class from completing a town-to-town route. Loss of a Forest road may force users to trailer between riding areas rather than traveling legally through the designated network.

UPLA therefore urges the Forest Service to consider **gateway-community connectivity** when evaluating recreation effects under Alternative 2. The recreational value of a National Forest transportation system should not be measured solely inside the Forest boundary.

#### **H. Concentrating Motorized Use onto Fewer Routes Can Create the Resource Problems Agencies Seek to Avoid**

Closing or restricting motorized access does not eliminate demand. In many cases, it redistributes users onto the remaining legal system. That concentration can increase encounters among users, parking pressure, dust, noise, dispersed-camping demand, tread wear, sanitation problems, and maintenance requirements. It can also reduce the quality of both motorized and nonmotorized recreation by concentrating more visitors into fewer corridors.

Utah's interconnected trail systems provide an alternative management model. Loops distribute traffic. Multiple community access points disperse staging demand. Different route widths accommodate different vehicle classes. Designated difficulty levels distribute riders according to skill and equipment. Shared-use corridors can be employed where appropriate, while uses can be separated where terrain, resource concerns, or recreation objectives warrant different management. This is a more sophisticated approach than continually shrinking the motorized network and assuming environmental effects disappear with each closure.

UPLA encourages the Forest Service to evaluate whether Alternative 2 can facilitate better distribution of recreational use through carefully designed connections, reroutes, loops, and alternative access points. In some locations, adding or restoring a short route may reduce pressure elsewhere.

#### **I. Motorized Users Help Maintain the System They Depend Upon**

Utah's motorized recreation infrastructure is sustained through a substantial partnership among public agencies, counties, local communities, clubs, volunteers, and recreation organizations. State OHV grant records demonstrate this directly. Funding has supported trail maintenance, signage, brushing, drainage work, bridge and barrier installation, obstruction removal, mapping, equipment purchases, and other projects necessary to keep public routes usable and environmentally sustainable (UDOR, 2020).

UPLA and its members participate in this same stewardship culture. Utah's OHV community reports damaged routes, clears vegetation, removes trash, assists with maintenance, supports trail education, contributes equipment and labor, and advocates for funding that benefits recreation infrastructure. This is one reason UPLA rejects the premise that reducing human access is inherently synonymous with increasing conservation. Access creates a constituency for maintenance. A rider who uses the same trail year after year notices the failed culvert, illegal spur, washed-out drainage, damaged sign, or downed tree. Clubs develop long-term relationships with land managers because their members care whether the system remains functional. Counties invest in trail infrastructure because those routes connect their communities to public lands. Responsible use and stewardship reinforce one another.

## J. Alternative 2 Would Allow Utah to Manage Access as a System Rather Than a Collection of Surviving Routes

The principal recreation benefit of Alternative 2 is not automatic reopening. UPLA recognizes that rescission of the Roadless Rule would not itself reopen a closed road, modify a Motor Vehicle Use Map, eliminate Wilderness restrictions, supersede a Forest Plan, or authorize cross-country motorized travel. Existing route designations would remain until changed through applicable procedures. The benefit is prospective. Alternative 2 would restore the Forest Service's ability to ask whether the existing system still works.

- Can a short connection turn two dead ends into a useful loop?
- Can an environmentally problematic route be moved to a more sustainable alignment rather than closed?
- Can a rockslide-damaged access route be reconstructed?
- Can a 50-inch segment be responsibly modified so a modern side-by-side can complete an otherwise compatible loop?
- Can a connection between National Forest and BLM lands improve a regional trail system?
- Can a route reaching a trail town be preserved because its value extends beyond its mileage?
- Can an alternative route maintain access for people with disabilities when an existing route must be closed?

These are ordinary transportation and recreation-planning questions. They should not become extraordinary merely because a line drawn during a decades-old roadless inventory crosses the proposed solution.

Utah has already demonstrated what a connected motorized system can accomplish. Fishlake's Paiute routes connect communities and create destination loops. The Arapen system integrates Forest roads and motorized trails across the Wasatch Plateau. The Great Western Trail crosses jurisdictional boundaries as a multiple-use corridor. Ashley National Forest provides 1,151 miles of roads and trails available for ATV recreation across a 1.3-million-acre landscape. Utah invests public funds in keeping these systems maintained, signed, connected, and usable.

That is not unmanaged access. It is **managed access**, and the distinction matters. UPLA therefore urges the Forest Service to select **Alternative 2 and fully rescind the 2001 Roadless Area Conservation Rule**. Public ownership carries little meaning if access becomes progressively theoretical. Utah's National Forests should remain places where families can travel together, hunters and anglers can reach dispersed destinations, people with disabilities can experience remote landscapes, rural communities can remain connected to recreation economies, and responsible motorized users can continue helping maintain the roads and trails upon which those opportunities depend. The proper question is not how much land can remain technically open while transportation access disappears. The proper question is whether Utah's National Forest recreation system remains connected, adaptable, sustainable, and genuinely available to the public. Alternative 2 provides a substantially better framework for achieving that result.

**UPLA’S EXPERIENCE DEMONSTRATES THAT  
ACCESS AND STEWARDSHIP ARE COMPATIBLE**

UPLA supports selection of Alternative 2 and full rescission of the 2001 Roadless Area Conservation Rule because Utah provides extensive practical evidence that public access and resource stewardship are not competing objectives. Across the State, motorized recreationists, counties, local communities, State agencies, nonprofit organizations, and federal land managers routinely work together to maintain routes, rehabilitate damaged landscapes, improve signage and drainage, remove obstructions, educate visitors, and direct recreation onto sustainable transportation systems. These partnerships function because people have a continuing connection to the landscapes they are helping to maintain.

UPLA’s experience with Utah public-land management reinforces a basic principle: durable conservation is more likely when the people who use public lands are enlisted in their care rather than progressively excluded from them. Motorized recreationists have a particularly direct stake in maintaining functional roads and trails because poor drainage, erosion, wildfire damage, fallen trees, rockslides, inadequate signing, and unauthorized route proliferation can threaten both natural resources and the continued viability of the recreation system.

Utah has already developed institutional mechanisms for converting that interest into stewardship. The State’s Off-Highway Vehicle Recreation Grant program, volunteer trail organizations, county recreation programs, Watershed Restoration Initiative projects, and cooperative federal-State partnerships routinely invest money, equipment, expertise, and labor in public-land infrastructure. These programs demonstrate that access can generate management capacity rather than merely management demand.

**A. Utah’s OHV Program Converts Recreation Participation Into Stewardship Funding**

Utah’s approach to OHV management is particularly relevant because the State has established a dedicated funding structure through which motorized recreation helps support the infrastructure upon which it depends. Utah’s OHV program is supported substantially by registration fees and other recreation revenues that are returned to trail development, maintenance, education, safety, law enforcement, and related management. The Utah Division of Outdoor Recreation administers the Off-Highway Vehicle Recreation Grant program to support projects undertaken by counties, municipalities, federal agencies, nonprofit organizations, and other eligible entities. Eligible projects include construction and maintenance of OHV trails, trailheads, signage, maps, education, safety programs, search and rescue, and other infrastructure necessary to sustain responsible recreation (Utah Division of Outdoor Recreation [UDOR], 2026a).

The significance extends beyond the existence of a grant program. Utah has created a management structure in which the motorized recreation community contributes financially to keeping public access sustainable. OHV users are therefore not simply beneficiaries of roads and trails. They are participants in a system that helps finance the maintenance, education, enforcement, and physical improvements necessary to protect those routes and surrounding resources. That structure provides a useful counterpoint to the assumption that reducing access necessarily reduces environmental impact. A designated route supported by maintenance funding, signage, user education, enforcement, and an engaged recreation

community can provide substantially greater resource protection than an unmanaged landscape in which legitimate access opportunities have disappeared but recreational demand has not.

UPLA believes federal policy should strengthen this management model rather than diminish the recreation constituency that helps sustain it.

### **B. Utah's Trail Systems Show What Stewardship Looks Like on the Ground**

The stewardship relationship is particularly visible on Utah's major motorized trail systems. On the Fishlake National Forest, State OHV funding has supported maintenance across the Paiute, Great Western, Gooseberry, and associated trail systems. Funded work has included logging and brushing, removal of rocks and other obstructions, tread repair, water diversion, signage, maintenance of cattle guards and barriers, bridge work, and maintenance of existing trail structures. One project encompassed work across 24 trails and trailheads and carried a total project value of \$182,500, including \$90,000 in State grant funding (UDOR, 2020).

These activities are resource management. Removing obstructions helps keep vehicles on the designated alignment. Maintaining drainage prevents water from concentrating in wheel tracks and accelerating erosion. Clear route markers reduce inadvertent travel onto unauthorized alignments. Maintaining bridges and crossings protects aquatic and riparian resources. Brushing preserves sight distance and keeps users from widening routes to avoid vegetation. Trailhead improvements help concentrate staging activity in locations designed to accommodate it.

Utah has also used OHV funding to respond when natural events physically eliminate access. State grant records document \$40,000 in funding toward a \$45,000 project to remove major rockslides that had closed access to the Big Ridge ATV Network from North Hatch Canyon (UDOR, 2020). That project illustrates a practical reality sometimes overlooked in federal access policy: an existing route does not remain available merely because a map continues to designate it as open. Maintaining public access requires work.

Rockslides, floods, wildfire, erosion, vegetation, and ordinary deterioration can make a legal route physically unusable. Where reconstruction or substantial repair is required, the ability to perform that work becomes inseparable from the continued existence of the recreation opportunity.

### **C. The Arapleen Trail System Demonstrates the Value of Local Stewardship Partnerships**

The Arapleen Trail system on the Manti-La Sal National Forest provides another useful Utah example because its success depends heavily upon cooperation among the Forest Service, Sanpete County, Emery County, local communities, recreation organizations, and volunteers. The system combines Forest roads and motorized trails into an extensive network across the Wasatch Plateau, with routes connecting communities, campgrounds, lakes, scenic areas, hunting country, and other recreation destinations. Its management requires far more than drawing route lines on a Motor Vehicle Use Map. Routes must be

maintained, signed, cleared, monitored, and repaired, while changing environmental conditions must be addressed as they arise.

Utah's county governments have become particularly important partners in this work. County involvement brings local equipment, personnel, institutional knowledge, emergency-response capability, and familiarity with how individual routes function within the larger transportation system. Local users likewise possess information that can be difficult to reproduce through periodic agency inspection alone. People who repeatedly travel a route know where runoff concentrates, where a culvert is beginning to fail, where signage is confusing, where vegetation is forcing traffic toward the edge of the tread, and where unauthorized use is beginning to develop.

This knowledge has management value. UPLA believes federal land policy should recognize local recreation organizations and users as potential sources of information and stewardship capacity rather than treating public presence primarily as a resource stressor. The more effectively agencies cultivate long-term relationships with those users, the earlier many route problems can be identified and corrected.

#### **D. Utah's Watershed Restoration Model Further Demonstrates That Access and Restoration Can Reinforce One Another**

The same principle extends beyond recreation-specific projects. As discussed elsewhere in this comment letter, Utah's Watershed Restoration Initiative has developed a statewide model for coordinating restoration across federal, State, local, Tribal, and private lands. What bears emphasis here is not the ecological justification for those projects, which UPLA has addressed in preceding sections, but the institutional lesson they provide. Successful restoration requires people to reach the landscape. Crews, contractors, volunteers, biologists, engineers, equipment operators, grazing permittees, county personnel, and monitoring teams require physical access to project areas. Existing roads frequently provide that access. In some circumstances, routes require repair before restoration can proceed. In others, road relocation or drainage improvements become part of the restoration itself.

The post-fire work in the Strawberry River corridor following the Dollar Ridge Fire provides a particularly useful example. Severe flooding damaged both the watershed and the transportation system. Subsequent work did not treat restoration of road access as inconsistent with ecological recovery. Portions of the road were reconstructed, raised, armored, or moved away from the stream bottom while crews simultaneously installed erosion-control features and restored riparian and upland vegetation. Later project documentation expressly recognized that restoration of access facilitated subsequent river and fisheries work (Utah Watershed Restoration Initiative [WRI], 2025).

The key relevance here is institutional rather than wildfire-specific. Utah's restoration programs routinely demonstrate that access can be a tool used to accomplish conservation. A regulatory structure that treats the presence or reconstruction of a road principally as a loss of roadless character can miss that relationship. A more useful inquiry asks what function the transportation feature serves, what impacts it creates, whether those impacts can be mitigated, and whether the route facilitates other management objectives. Alternative 2 permits that more complete evaluation.

### **E. Stewardship Is More Durable When Users Retain a Long-Term Stake in the Landscape**

Volunteer stewardship depends upon continuity. People devote time to clearing a trail, repairing drainage, installing signs, reporting damage, participating in cleanup projects, and educating other visitors because they expect to return. Local clubs develop relationships with land managers because the route is part of their community and recreation culture. Counties invest in trail systems because those systems connect residents and visitors with public lands and support local economies. When users have confidence that responsible participation can help preserve a route, stewardship becomes an investment in the future.

Conversely, a management system that repeatedly accepts volunteer labor while treating eventual closure as the preferred solution to resource conflict risks undermining the very partnerships upon which agencies increasingly rely. A volunteer who spends years repairing drainage and removing trash has a reasonable expectation that the agency will seriously consider maintenance, mitigation, reconstruction, or relocation before eliminating the access that motivated that work. We're not suggesting that volunteer investment creates an entitlement to perpetual use. Some routes may ultimately prove unsustainable. Resource conditions can change, statutory constraints may control, and certain impacts may not be reasonably mitigated. But stewardship should affect the management calculus. Where users, counties, State agencies, and nonprofit organizations are willing to contribute labor, equipment, technical expertise, funding, monitoring, and continuing maintenance, those resources should be considered before the Forest Service concludes that closure is necessary.

### **F. Utah's Management Experience Supports Mitigation Before Closure**

UPLA strongly supports a mitigation-first approach to motorized-route conflicts. When a route is creating a documented resource problem, the agency should identify the mechanism causing the impact and select a remedy proportionate to that problem. Excessive erosion may require drainage structures, surfacing, grade modification, or relocation. A failing stream crossing may require hardening or redesign. Seasonal soil saturation may justify a seasonal restriction rather than permanent closure. Unauthorized route proliferation may require better signing, barriers, education, and enforcement. A poorly located segment may warrant a short reroute.

Utah's existing stewardship programs already employ these tools. The State OHV grant program finances trail maintenance and physical improvements. Watershed projects reconstruct roads while correcting drainage and erosion problems. Counties maintain recreation infrastructure. Federal land managers work with local partners to clear routes, repair damage, and improve visitor management. These are not exceptional practices. They are ordinary components of responsible public-land administration.

The problem arises when a regulatory classification removes an otherwise reasonable remedy from consideration. If an environmentally damaging alignment could be relocated onto more stable terrain, but the replacement alignment constitutes prohibited road construction or reconstruction within an IRA, the regulatory framework can make closure easier than correction. If a route damaged by a landslide could be reconstructed using contemporary engineering standards but reconstruction is independently constrained

by Roadless prohibitions, public access may disappear even where a more sustainable transportation solution exists.

UPLA does not believe conservation policy should produce that incentive. The preferred sequence should be straightforward: identify the impact, determine its cause, evaluate practicable mitigation, engage partners capable of assisting with implementation, monitor the result, and consider closure only where lesser measures cannot adequately protect the resource.

### **G. Utah's Counties and Communities Are Stewardship Partners, Not Peripheral Stakeholders**

Utah's public-land geography also makes county and community participation particularly significant. National Forest roads and trails frequently connect directly with county transportation systems and communities. The Paiute system links public lands with communities including Marysville and Circleville. Arapahoe routes connect the Wasatch Plateau with communities in Sanpete and Emery Counties. Other systems cross between Forest Service and BLM lands before entering county or municipal networks. As a result, counties often have interests extending beyond recreation promotion. They may participate in search and rescue, emergency response, road maintenance, signage, visitor management, economic development, law enforcement, and coordination with adjacent landowners. The Forest Service therefore gains more than political support when it works cooperatively with counties. It gains local implementation capacity.

This model aligns with the cooperative character of Utah public-land management. UPLA routinely works with local governments, recreation organizations, land managers, and individual users because effective stewardship occurs at the scale of actual landscapes and communities. Problems are frequently solved by people who know the road, know the drainage, know where visitors stage, know which routes connect, and understand what happens when access is altered. Alternative 2 would give Forest Service officials greater ability to use that local capacity rather than requiring every transportation problem inside an IRA to begin with the constraints imposed by a national rule.

### **H. Access Produces Information That Agencies Need**

There is another stewardship benefit to continued public access that is difficult to quantify but important in practice: users provide surveillance across enormous public landscapes. Utah's National Forests encompass millions of acres. Forest Service employees cannot continuously observe every road, trail, campsite, drainage, stream crossing, sign, gate, culvert, or dispersed recreation area. The public can. Responsible recreationists routinely encounter conditions that warrant management attention: washouts, plugged culverts, damaged bridges, illegal dumping, abandoned campfires, vandalism, fallen trees, unauthorized routes, missing signs, erosion, damaged gates, wildlife conflicts, and unsafe conditions. A recreation community that regularly uses a landscape can become an informal early-warning network. This does not replace professional inspection or agency responsibility. It supplements both. UPLA's experience engaging Utah recreationists repeatedly demonstrates that users possess detailed route-level knowledge precisely because they remain connected to the landscape. That information

becomes particularly valuable during travel-management planning, environmental review, maintenance prioritization, and post-disturbance assessment.

Policies that progressively eliminate public access can therefore carry an institutional cost beyond lost recreation. They also reduce the number of knowledgeable eyes on the ground.

### **I. Alternative 2 Better Supports Utah's Partnership-Based Stewardship Model**

UPLA's support for Alternative 2 is ultimately grounded in the management system we have seen work in Utah. Utah does not protect its public lands solely through exclusion. It uses designated routes, OHV registration revenues, State grants, county partnerships, volunteer organizations, restoration programs, education, engineering, maintenance, enforcement, and collaboration with federal land managers. That model is imperfect, as every land-management system is. But it recognizes something the Roadless Rule too often obscures: a road or trail should be evaluated according to what it does, how it is managed, what impacts it creates, what public purposes it serves, and whether those impacts can be corrected.

We support managing roads versus determining that closure is the most expeditious and effective solution to a resource, environmental impact, management capacity, or any other problem. If a route is eroding, repair its drainage or improve its alignment. If a stream crossing is failing, redesign it. If a landslide blocks access, determine whether reconstruction is feasible. If users are leaving the designated route, improve delineation and enforcement. If a segment cannot be made sustainable in its existing location, evaluate relocation. If volunteer organizations or counties can provide labor, equipment, monitoring, or funding, incorporate that capacity into the solution. Closure remains available when the evidence demonstrates that other measures cannot adequately resolve the problem. It should not become the preferred outcome merely because the regulatory structure has made every constructive alternative more difficult.

Full rescission under Alternative 2 would not guarantee a particular transportation decision. It would restore the Forest Service's ability to choose from a broader set of management responses and allow Utah's existing stewardship partnerships to participate meaningfully in implementing those solutions. We assert with emphasis that this is a better model for conservation. Utah's trail systems, State OHV program, county partnerships, volunteer community, and watershed-restoration programs demonstrate that public access can create both responsibility and capacity. The people who use these landscapes are often the same people who maintain trails, report damage, support restoration funding, educate other users, and return after floods, fires, and storms to help put recreation infrastructure back together.

The objective should not be to manage people out of public lands. It should be to give people a meaningful role in managing them well. For these reasons, UPLA urges the Forest Service to select Alternative 2 and fully rescind the 2001 Roadless Area Conservation Rule.

## **RESCISSION CAN IMPROVE ENVIRONMENTAL OUTCOMES THROUGH BETTER ROUTE AND INFRASTRUCTURE DESIGN**

UPLA supports Alternative 2 because environmental performance should be measured by conditions on the ground, not by whether a transportation feature conforms to an administrative roadless classification created decades earlier. Utah's National Forest transportation system contains roads established under widely differing eras of engineering, resource protection, and recreation management. Where an existing alignment is poorly located, the most protective solution may require reconstruction or relocation rather than preservation of the existing footprint or elimination of the transportation connection.

This issue warrants particular attention because contemporary Forest Service policy already recognizes route realignment as a legitimate resource-protection technique. Current Forest Service NEPA regulations categorically exclude certain construction and realignment of up to two miles of National Forest System road and specifically identify rerouting a road "to minimize resource impacts" as an example of an action eligible for that provision (36 C.F.R. § 220.6(e)(24)). The Roadless Rule imposes a substantially narrower standard within Inventoried Roadless Areas. Its road-realignment exception applies where an existing classified road is causing irreparable resource damage because of its design, location, use, or deterioration, maintenance cannot correct the problem, and the road is deemed essential for specified purposes (36 C.F.R. § 294.12(b)(4)).

There is zero environmental logic in waiting for a transportation problem to deteriorate to that threshold before managers can fully consider a better alignment. Alternative 2 would permit the Forest Service to address problems prospectively, while mitigation remains practical and before avoidable resource damage becomes entrenched.

### **A. Utah's Terrain Makes Route Location an Environmental Variable**

This issue is especially relevant in Utah because route sustainability can change dramatically over short distances. Steep mountain grades, erosive soils, narrow drainages, high-elevation snowpack, monsoonal precipitation, stream crossings, and post-fire hydrologic changes can make one alignment environmentally problematic while another nearby alignment performs substantially better. Forest Service watershed-management guidance recognizes that roads can affect runoff, sediment delivery, aquatic systems, and channel processes and identifies improved location, drainage, maintenance, reconstruction, and decommissioning among the practices available to reduce those effects (USFS, 2012). The appropriate objective is therefore not preservation of an existing transportation footprint for its own sake. It is development of a transportation system whose location and design are compatible with watershed function and other resource objectives.

Utah's own restoration experience demonstrates how this works in practice. Following the Dollar Ridge Fire, restoration in the Strawberry River corridor included reconstruction and modification of damaged transportation infrastructure in conjunction with watershed rehabilitation. Project work included moving portions of the road away from the stream bottom, raising and armoring roadway segments, installing structures to address debris and runoff, and restoring adjacent riparian and upland areas (WRI, 2025). As

discussed elsewhere in UPLA's comments, that work also restored the physical access necessary for subsequent river and fisheries rehabilitation.

The lesson is broader than post-fire recovery. Sometimes moving or rebuilding infrastructure is itself part of restoring the landscape.

### **B. Sustainable Access Requires the Ability to Correct Legacy Alignments**

UPLA has consistently advocated mitigation before closure because many route conflicts arise from the location or design of a particular segment rather than from the existence of motorized access itself. A road descending directly down a fall line may require drainage redesign or relocation. A route occupying a stream bottom may be more appropriately moved to a bench or sideslope. A crossing that chronically delivers sediment may warrant hardening, replacement, or a different approach. An unstable segment may require reconstruction on more suitable terrain. A route passing through a sensitive resource may be capable of being shifted a relatively short distance while preserving the larger transportation connection. These are engineering questions as much as land-use questions. The distinction matters because closing an entire route in response to a deficient segment can eliminate access far beyond the location where the environmental problem occurs. Conversely, correcting several hundred feet of poorly designed road may preserve miles of useful transportation infrastructure while producing a better watershed or habitat outcome.

The Fishlake National Forest's current consideration of relatively short modifications to portions of the Paiute system illustrates the broader management value of small transportation changes. As discussed in UPLA's preceding section, changes affecting less than a mile or only a few miles can determine whether larger loops and community connections function as intended (USFS, 2026). The same principle applies environmentally: a relatively small relocation or reconstruction project can determine whether the remainder of a route can remain sustainable.

UPLA therefore urges the Forest Service to evaluate transportation impacts at the scale of the actual problem rather than allowing the regulatory status of the surrounding acreage to predetermine the available remedy.

### **C. Alternative 2 Would Allow Earlier, More Precise Intervention**

The Roadless Rule does contain exceptions for certain road reconstruction and realignment. Our concern is that the Rule's narrow exception for realignment associated with resource damage is reactive. It contemplates circumstances in which irreparable resource damage already exists and cannot be corrected through maintenance (36 C.F.R. § 294.12(b)(4)). Environmental policy should favor earlier intervention. If monitoring identifies an alignment likely to continue degrading a stream, meadow, slope, or watershed, managers should be able to compare reconstruction or relocation against continued maintenance and closure before the problem reaches an advanced condition. That analysis should consider soil stability, drainage, hydrology, aquatic resources, wildlife, cultural resources, recreation connectivity, construction effects, maintenance requirements, and the restoration potential of the abandoned footprint. Where

relocation provides the superior overall outcome, the administrative label attached to the surrounding acreage should not prevent the Forest Service from selecting it.

Alternative 2 would remove the Roadless Rule as a separate national constraint while leaving the underlying environmental analysis intact. Forest Plans, applicable travel-management requirements, the National Environmental Policy Act, the Endangered Species Act, the National Historic Preservation Act, the Clean Water Act, engineering standards, and other governing authorities would continue to apply according to their respective terms. Rescission therefore does not require more roads. It allows better decisions about roads.

#### **D. Utah Needs a Transportation System That Can Be Improved, Not Merely Inherited**

Utah's National Forest roads and motorized trails are infrastructure. Like other infrastructure, they require inspection, maintenance, adaptation, reconstruction, and, where necessary, relocation or retirement. We thus support giving land managers the ability to distinguish between infrastructure that should remain, infrastructure that should be improved, infrastructure that should be relocated, and infrastructure whose impacts cannot reasonably be mitigated. This is essential to responsible multiple-use management.

Alternative 2 would allow the Forest Service to focus more directly on measurable environmental outcomes rather than using continued roadlessness as a proxy for environmental quality. Where removing a road provides the best result, that option remains available. Where maintaining an existing route is appropriate, it can remain. Where reconstructing or relocating a deficient segment provides better resource protection while retaining legitimate access, federal policy should permit that solution to compete on its merits.

We again therefore emphasize our support for full rescission of the Roadless Rule under Alternative 2. Utah's National Forest transportation system should be capable of improving as engineering knowledge, environmental conditions, recreation patterns, and resource-management needs change. A regulatory framework that preserves flexibility to correct infrastructure before it becomes a larger environmental problem offers a more durable conservation strategy than one that unnecessarily limits the range of solutions available to local land managers.

#### **PUBLIC LAND ACCESS IS PART OF RURAL UTAH'S ECONOMIC INFRASTRUCTURE**

UPLA supports Alternative 2 and full rescission of the 2001 Roadless Area Conservation Rule because, in Utah, National Forest access is inseparable from the economic viability of many rural communities. This relationship is broader than tourism. Forest roads and recreation systems connect small communities with visitors, hunting and fishing destinations, livestock operations, forest-management projects, seasonal employment, outfitters, guides, equipment businesses, and the extensive public-land economy that distinguishes much of rural Utah from metropolitan areas along the Wasatch Front. For these communities, federally managed public land is not a distant amenity. It surrounds them.

More than two-thirds of Utah is federally managed public land, the majority of which is particularly concentrated in many rural counties (Congressional Research Service [CRS], 2020). Several Utah

counties contain National Forests, BLM lands, National Parks, monuments, Wilderness, and other public lands across substantial portions of their land base. The consequence is straightforward: federal management decisions exert unusual influence over the economic opportunities available to neighboring communities.

The Roadless Rule should therefore be evaluated not merely according to what occurs inside an IRA boundary, but according to what its restrictions mean for communities whose economic geography extends directly into the National Forest.

#### **A. Utah's Rural Recreation Economy Depends Upon Connections Between Public Lands and Communities**

Utah has intentionally developed motorized recreation as a community-connected economic asset. The Paiute ATV Trail system provides one of the clearest examples. Rather than functioning as an isolated riding area with a centralized trailhead, the system connects communities throughout central Utah with National Forest roads and trails. Riders can travel between public lands and communities for lodging, fuel, meals, groceries, vehicle repairs, equipment, and other services. The towns themselves become part of the recreation system. Research examining the Paiute Trail found substantial economic effects in communities along the system. An economic assessment conducted for Utah State Parks estimated that nonresident users accounted for a particularly important share of visitor expenditures and documented millions of dollars in annual spending associated with the trail system, supporting employment and income in surrounding communities (Jakus et al., 2008).

The relevance extends beyond the specific economic totals produced by a study now more than a decade old. The Paiute system demonstrates the economic structure that matters for this rulemaking. A Forest road or trail does not need to contain a commercial enterprise to generate economic activity. Its economic function may be to connect visitors with a community where the spending occurs. The Forest Service itself continues to recognize the importance of those connections. As discussed elsewhere in this comment letter, recent Fishlake National Forest transportation planning has evaluated short route modifications specifically because they would create loops and improve legal connections involving Marysville, Beaver, Circleville, and the broader Paiute system (USFS, 2026). That relationship changes how access should be valued. A mile of road that completes a community connection may have considerably greater socioeconomic significance than several miles of isolated route elsewhere.

#### **B. Rural Utah Is Especially Sensitive to the Geographic Distribution of Federal-Land Benefits**

Statewide recreation totals can obscure this effect. Utah's outdoor recreation economy is substantial. The U.S. Bureau of Economic Analysis reported that outdoor recreation contributed \$9.5 billion to Utah's economy in 2023 and supported 71,898 jobs, representing 3.4% of State GDP and 4.1% of employment (Utah Governor's Office of Economic Opportunity [GOEO], 2024). Those figures establish the importance of outdoor recreation to Utah, but they do not answer the question most relevant to the Roadless Rule: where does that economic activity occur? For communities such as Marysville, Beaver, Circleville, Richfield, Salina, Panguitch, Monticello, Moab, Ephraim, Orangeville, and other rural gateways to federal lands, changes in public access can have consequences far greater than statewide

statistics reveal. Fuel purchases, motel stays, campground nights, restaurant spending, vehicle repairs, equipment sales, guiding, outfitting, and other expenditures are captured locally.

This concentration matters because many of these communities have small populations and comparatively narrow economic bases. A change that disappears statistically within Utah's statewide economy can remain highly consequential to an individual town. UPLA therefore urges the Forest Service to evaluate socioeconomic effects at a scale capable of detecting them. Statewide and national totals are useful context, but they cannot substitute for analysis of affected counties, communities, trail systems, and recreation corridors.

### **C. Utah's Trail Town Model Creates Economic Value by Extending Trips Across the Landscape**

The economic value of motorized recreation also depends upon the character of the trip. A visitor who can travel from one community through a National Forest trail system to another may purchase fuel in one town, lunch in another, stay overnight elsewhere, and return through a different portion of the network. A connected trail system can encourage multi-day travel and distribute spending among several communities. That is materially different from a recreation model in which visitors trailer vehicles to a single staging area, ride an isolated route, and leave.

Forest Service recreation research has found that visitor spending varies substantially according to whether visitors are local or nonlocal and whether trips involve overnight stays. Trip characteristics can therefore be as important to economic contribution as the recreation activity itself (White & Stynes, 2008; White, 2017). Utah's community-connected OHV systems are particularly responsive to these variables. The Paiute and Arapsee systems, together with other motorized networks on the Fishlake and Manti-La Sal National Forests, allow recreation to function at a landscape scale. Communities serve as staging points, destinations, resupply locations, and overnight stops. Street-legal OHVs can further integrate designated public-land routes with community transportation networks where operation is authorized under Utah law.

A federal access decision that interrupts one of those connections can therefore change more than route mileage. It can change the structure of the trip. UPLA recommends that the Forest Service analyze whether Roadless restrictions affect community connections, destination loops, multi-day itineraries, access to lodging and services, and the ability of trail systems to distribute visitors among rural communities.

### **D. National Forest Management Supports Economic Activity Beyond Recreation**

Utah's rural public-land economy also cannot be reduced to visitor spending. National Forests support grazing, timber and forest products, outfitting and guiding, vegetation management, watershed restoration, infrastructure work, hunting and fishing, recreation, and other activities. Many of these uses depend directly or indirectly upon transportation access. For this reason, UPLA rejects the premise that rescission requires choosing between a recreation economy and an active-management economy. Utah needs both. A contractor performing vegetation treatment requires access. A rancher operating under a federal grazing permit may depend upon roads to reach infrastructure and livestock. A recreation

business depends upon visitors reaching destinations. Counties require transportation access for search and rescue and other public services. Restoration crews need to move personnel, equipment, and materials. Hunters, anglers, campers, and OHV users support businesses in surrounding communities.

These activities can occupy the same landscape without occupying the same acre at the same time. Utah's Shared Stewardship and Watershed Restoration Initiative programs already operate on this premise. They bring together federal agencies, State agencies, counties, private landowners, permittees, conservation organizations, contractors, and other partners to accomplish work across ownership boundaries. As addressed in preceding sections of UPLA's comments, this model treats active intervention as compatible with conservation.

The economic corollary is equally important: restoration and land management create work. Alternative 2 provides greater opportunity to retain a diversified rural economy in which recreation, grazing, forest management, restoration, and other lawful uses coexist rather than being progressively narrowed through overlapping administrative restrictions.

#### **E. Federal Land Policy Has Distributional Consequences in Counties With Limited Private Land**

The Forest Service should also account for the unusual fiscal circumstances of communities surrounded by federal land. Unlike private property, federal land generally does not contribute to local property-tax revenues in the same manner as taxable private land. Congress has long recognized this circumstance through the Payments in Lieu of Taxes program and other federal mechanisms intended to offset some of the fiscal effects associated with federal ownership (31 U.S.C. §§ 6901–6907). Those payments do not eliminate the importance of economic activity generated by public-land access.

A visitor who purchases fuel or stays overnight generates private revenue and associated tax activity. A forest-management contract generates wages and business expenditures. An outfitter or guide operating on federal land can support a locally based enterprise. A grazing operation contributes to agricultural activity. A recreation event can bring substantial short-term spending into a small community. For counties with extensive federal ownership, the ability to derive lawful economic activity from surrounding public lands is therefore especially significant.

This does not mean National Forest lands should be managed to maximize revenue. Rescission of the Roadless Rule is not the functional equivalent of converting public lands into commercial-development zones. The evaluation of the proposal for rescission requires that socioeconomic analysis should recognize the asymmetry created when the federal government controls a large share of a county's land base and then imposes national restrictions that reduce the range of lawful activities capable of occurring there. That burden is not evenly distributed across the country or even across Utah. Rural counties bear it most directly.

## **F. The Existing Baseline Can Conceal Economic Opportunities That the Roadless Rule Has Prevented**

UPLA also urges caution in how the Forest Service constructs the economic baseline for Alternative 1. The Roadless Rule has been in effect for 25 years. During that period, its road-construction and reconstruction prohibitions have constrained the range of projects that could be proposed or implemented within IRAs. Consequently, some of the economic effects associated with the Rule cannot be observed as lost existing activity because the relevant activity never had an opportunity to develop.

This is especially important in Utah, where IRAs encompass a substantial portion of National Forest System acreage. A trail connection never constructed produces no historic visitor-spending record. A route relocation that cannot occur creates no measurable increase in visitation. A restoration or forest-management project that is never proposed because access makes it operationally infeasible leaves no lost contract in an economic database. A community cannot report lodging or fuel sales from visitors who never had a reason or practical means to reach a destination.

This creates the risk of treating regulatory suppression as economic neutrality. The Forest Service should instead consider reasonably foreseeable opportunity under Alternative 2. That does not require assuming every possible road, recreation connection, vegetation treatment, or commercial activity will occur. It requires acknowledging that rescission changes the range of management choices available and that some of those choices carry socioeconomic value. We recommend evaluating that opportunity at the Forest and county scale, with particular attention to areas where existing Forest Plans permit activities that have been independently constrained by Roadless prohibitions.

## **G. Economic Resilience Requires Flexibility, Not Dependence Upon a Single Public-Land Use**

Utah's rural communities have experienced repeated economic transitions. Mining, agriculture, timber, grazing, energy, tourism, and recreation have each played different roles in different places and periods. Federal policy should not make those communities more vulnerable by unnecessarily narrowing their economic options. Recreation is an increasingly important component of Utah's economy and should be protected accordingly. UPLA strongly supports continued motorized and other recreation access. But a resilient rural economy is not one in which every community is forced to depend exclusively upon tourism. Nor is it one in which recreation is sacrificed for extractive use.

Resilience comes from maintaining a broad range of compatible opportunities. A community may benefit simultaneously from OHV visitors, hunters, anglers, grazing operations, forest-restoration contractors, outfitters, seasonal Forest Service employment, campgrounds, local events, and businesses serving each of those activities. The multiple-use framework is economically valuable in part because it permits this diversity. Alternative 2 better reflects that reality.

Rescission would not guarantee economic development, authorize activities inconsistent with Forest Plans, or remove environmental review. It would restore greater latitude to evaluate opportunities according to contemporary conditions rather than maintaining a nationwide prohibition adopted in 2001. For rural Utah, that flexibility has value.

## **H. UPLA Supports an Economic Analysis Grounded in Rural Utah**

UPLA urges the Forest Service to evaluate the socioeconomic consequences of Alternative 2 according to how Utah's National Forests actually function in relation to surrounding communities. That analysis should examine trail-town connectivity, overnight and nonlocal visitation, access-dependent recreation spending, grazing and permittee access, restoration and forest-management employment, county-level effects, and the consequences of federal ownership for communities with limited private land bases. It should also recognize reasonably foreseeable opportunities that may become practicable once Roadless prohibitions no longer operate as an independent national constraint.

This approach does not require assigning a commercial value to every acre of National Forest land. Some places appropriately provide economic benefits principally through scenery, watershed protection, wildlife habitat, solitude, nonmotorized recreation, or other nonmarket values. Those benefits should remain part of the analysis. But the converse is also true. A landscape should not be presumed to provide its greatest public benefit merely because economic and recreational opportunities have been administratively constrained.

Utah's rural communities have built a distinctive relationship with the public lands surrounding them. They recreate on those lands, work on them, graze livestock on them, guide visitors through them, restore them, fight fires on them, maintain routes across them, and build businesses around the people who come to experience them. Their economic future is therefore affected by federal land policy in ways that cannot be adequately represented by national averages.

We support full rescission under Alternative 2 because it restores greater capacity to evaluate those relationships locally. The objective should be neither development for its own sake nor preservation through economic exclusion. It should be a durable multiple-use framework in which conservation, recreation, active stewardship, and rural economic opportunity can coexist according to the capabilities and needs of the individual landscape. For Utah's gateway and rural communities, that is a substantially more equitable starting point.

### **THE ROADLESS RULE HAS REIMPOSED WILDERNESS-ORIENTED MANAGEMENT ON UTAH LANDS CONGRESS RELEASED FOR MULTIPLE USE**

UPLA supports selection of Alternative 2 and full rescission of the 2001 Roadless Area Conservation Rule because Utah presents a particularly compelling example of why a national roadless mandate is inappropriate. Congress has already considered the relationship between roadless National Forest lands, Wilderness designation, and multiple-use management in Utah. It did so expressly, through the Utah Wilderness Act of 1984, and reached a deliberate legislative compromise: certain lands warranted permanent Wilderness designation, while other roadless lands were to remain available for non-Wilderness multiple uses.

The Roadless Rule subsequently overlaid broad prohibitions on road construction and reconstruction across much of that second category.

For UPLA, this is not merely a philosophical disagreement over the meaning of "roadless." It raises a fundamental question of institutional authority and congressional intent. Where Congress has expressly determined that particular National Forest lands should remain available for non-Wilderness multiple-use management, a nationwide administrative rule should not recreate Wilderness-oriented preservation by another mechanism.

#### **A. Congress Already Resolved the Wilderness Question for Utah's RARE II Lands**

The legislative history in Utah is unusually clear. Congress enacted the Utah Wilderness Act of 1984 after the Forest Service completed RARE II and after Congress conducted its own review of Utah's National Forest roadless areas. The statute's title itself described one of its purposes as releasing other Forest lands for multiple-use management. More importantly, Congress made substantive findings distinguishing between two categories of roadless land. Congress found that some undeveloped National Forest lands possessed characteristics warranting inclusion in the National Wilderness Preservation System. It separately found that other roadless lands either lacked outstanding Wilderness attributes or possessed significant "energy, mineral, timber, grazing, dispersed recreation, or other values" and therefore should not be designated as Wilderness but should remain available for non-Wilderness multiple uses (Utah Wilderness Act of 1984, Pub. L. No. 98-428, § 101, 98 Stat. 1657). Congress then acted on that distinction.

The Act designated specific lands as Wilderness, including portions of what were then the Wasatch-Cache, Uinta, Dixie, and other Utah National Forests. For lands evaluated through RARE II but not designated as Wilderness, Congress directed that they be managed for multiple use pursuant to National Forest planning requirements. Congress further provided that those lands did not need to be managed to protect their suitability for future Wilderness designation before or during revision of the initial Forest Plans (Utah Wilderness Act of 1984, § 201).

**This statutory structure matters greatly to UPLA. Congress did not simply designate certain Utah lands as Wilderness and remain silent about the rest. It affirmatively addressed the disposition of the remaining roadless lands.**

#### **B. Congress Drew a Line Between Wilderness Preservation and Multiple-Use Management**

Section 201 of the Utah Wilderness Act provides an unusually direct expression of congressional intent. Congress determined that the RARE II review constituted adequate consideration of Wilderness suitability for Utah National Forest lands for purposes of initial Forest planning. It directed that lands reviewed but not designated as Wilderness be managed for multiple use. For later Forest Plan revisions, Congress distinguished between areas actually recommended for Wilderness and those that were not. Lands recommended for Wilderness could be managed to preserve their Wilderness suitability. Lands not recommended did not have to be managed for that purpose (Utah Wilderness Act of 1984, § 201(b)). Congress went still further. Unless expressly authorized by Congress, the Department of Agriculture was prohibited from conducting another statewide roadless-area review of Utah National Forest lands for the purpose of determining Wilderness suitability (Utah Wilderness Act of 1984, § 201(b)(5)).

This statutory architecture is highly relevant to the present rulemaking. The distinction Congress established was not between developed lands and undeveloped lands. It was between lands Congress placed within the National Wilderness Preservation System, lands subsequently recommended for Wilderness through the prescribed planning process, and lands remaining subject to ordinary multiple-use management.

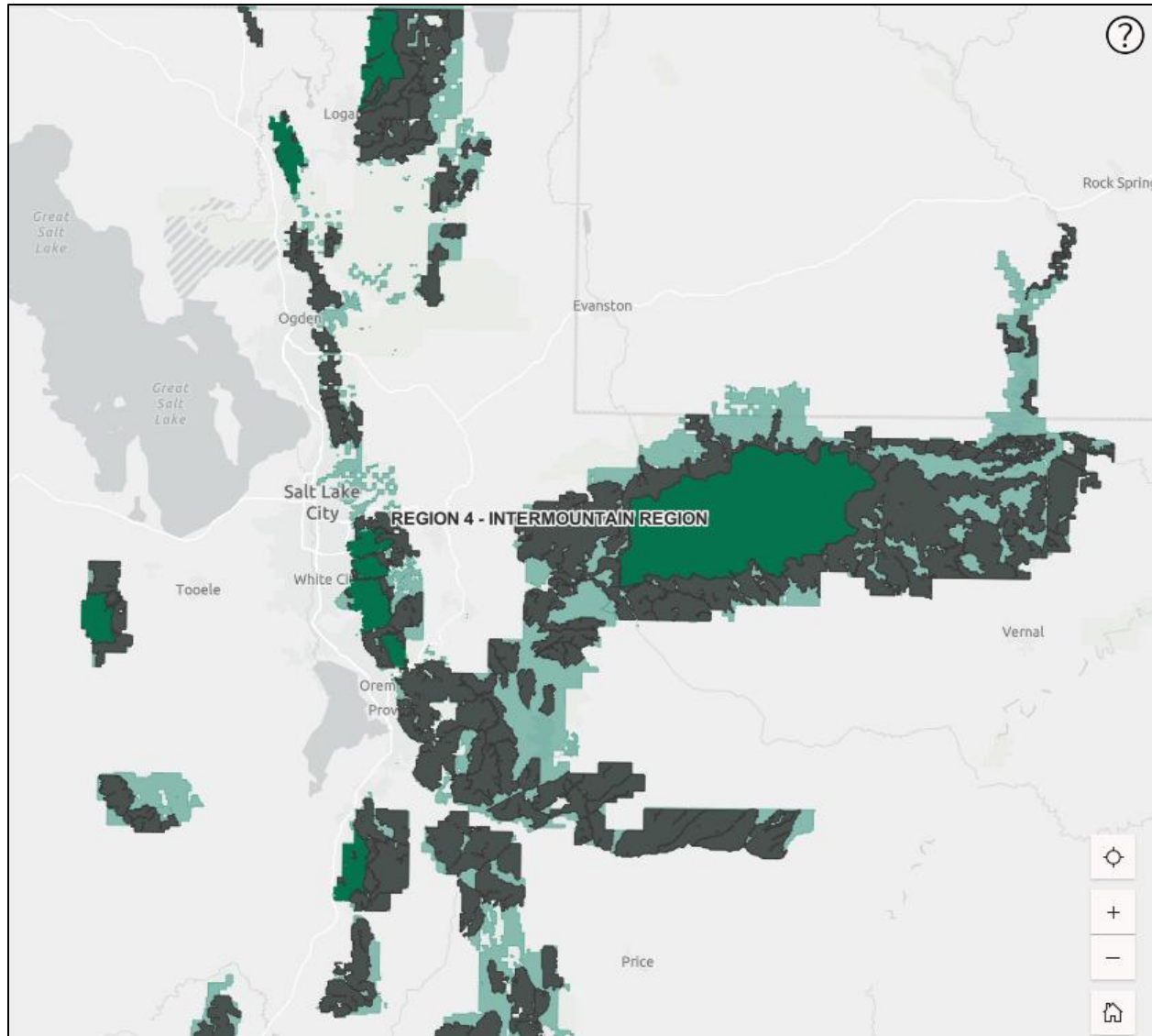
The 2001 Roadless Rule blurred those categories.

### **C. The Scale of the Roadless Overlay in Utah Magnifies the Conflict**

The geographic consequences are substantial. The Forest Service's 2000 Utah Roadless Rule mapping identified 3.567 million acres, representing 44% of Utah's National Forest System lands, as IRAs in which existing Forest Plan direction allowed road construction or reconstruction. Another 446,000 acres, representing 6%, were in IRA categories where road construction or reconstruction was already prohibited under existing planning direction. At that time, the Forest Service map identified no Utah acreage in the separate IRA category where the Forest Plan both prohibited road construction and recommended Wilderness (USFS, 2000).

Those numbers expose the structural problem with the national Rule more clearly than generalized discussion of roadlessness ever could. Before the Roadless Rule, the overwhelming majority of Utah IRA acreage shown in the Forest Service's own dataset was allocated under Forest Plans in a manner that allowed road construction or reconstruction. The national Rule then prohibited road construction across IRAs regardless of those underlying Forest Plan classifications. The Forest Service's current official geospatial metadata expressly acknowledges this history, explaining that the pre-Rule Forest Plan attributes are retained for historical reference but that the 2001 Rule prohibits road construction in IRAs regardless of those prior classifications (USFS, 2023).

For reference given that a picture is worth 1,000 words, view the map below of the Northeast region of Utah. This map is generated from the USDA 2001 Roadless Rule Rescission Draft Environmental Impact Statement Data Web Viewer. National Forest land is shown in light green, currently designated Wilderness is shown in dark green, and currently Inventoried Roadless Areas are shown in dark grey. The IRAs clearly form a robust layer of wilderness buffer zone surrounding the vast majority of designated Wilderness throughout Utah's national forests.



In Utah, therefore, the Roadless Rule did considerably more than preserve an existing management status quo. It superseded management distinctions previously established through Forest planning across millions of acres.

#### **D. The Wasatch-Cache Record Shows How Roadless Inventory and Wilderness Management Continue to Intersect**

The Wasatch-Cache National Forest planning record provides a particularly useful illustration of the continuing relationship between roadless inventory and Wilderness designation. The Forest's planning documentation reports that its 1983 roadless inventory identified 22 areas totaling 746,431 acres. Portions of six of those areas, High Uintas, Mount Naomi, Wellsville Mountains, Mount Olympus, Twin Peaks, and Deseret Peak, subsequently became congressionally designated Wilderness through the Utah Wilderness Act of 1984. When the Forest later undertook another inventory during Forest Plan revision, it

identified 34 roadless areas totaling roughly 606,400 acres, representing nearly half of the Wasatch-Cache National Forest at that time (USFS, 2003).

The Forest Plan expressly recognizes roadless lands as providing opportunities for potential Wilderness as well as nonmotorized recreation, limited motorized recreation, commodity uses, and other amenity values. Its Recommended Wilderness management prescription separately applies to areas identified through the Forest Plan revision's roadless inventory, evaluation, and recommendation process, while recognizing that Congress retains the ultimate designation authority (USFS, 2003).

There is nothing inherently improper about evaluating appropriate lands for Wilderness during Forest planning where federal law requires or authorizes that evaluation. Our objection concerns what happens to the much larger universe of land that has not been recommended or designated as Wilderness. A roadless inventory should be an analytical tool. It should not become a permanent substitute for a land-use designation.

#### **E. Utah's Forest Service Record Demonstrates Why "Roadless" Cannot Be Treated as Synonymous With Wilderness**

The Fishlake National Forest provides a useful counterexample to the assumption that inventoried roadless status necessarily reflects an underlying Wilderness-management decision. The Forest Service's Roadless Rule mapping identified 713,000 acres, or 49% of the Fishlake National Forest, as IRA acreage where Forest Plan direction allowed road construction and reconstruction. Only 4,000 acres were identified as IRA acreage where road construction or reconstruction was prohibited, and the map identified no Fishlake IRA acreage as Forest Plan-recommended Wilderness (USFS, 2000b). Yet the national Roadless Rule imposed its road-construction prohibition across the IRA acreage notwithstanding those Forest Plan distinctions.

That history is particularly relevant for UPLA because the Fishlake National Forest is not an abstract preservation landscape. It contains extensive grazing, vegetation management, wildlife management, watershed restoration, dispersed recreation, motorized recreation, hunting, camping, and other multiple uses. As discussed elsewhere in this comment letter, it also contains the Paiute and Great Western Trail systems and transportation connections important to communities including Marysvale, Beaver, and Circleville. The fact that acreage was inventoried as roadless did not mean the Forest Plan had determined it should be Wilderness. Indeed, the Forest Service's own 2000 classification demonstrates the opposite for 713,000 acres of the Fishlake National Forest.

#### **F. Utah's Congressional Settlement Should Not Be Replaced by Administrative Wilderness Preservation**

We fully understand and recognize the legal distinction between an IRA and congressionally designated Wilderness. The Roadless Rule does not impose every restriction contained in the Wilderness Act, and UPLA does not contend that an IRA becomes statutory Wilderness merely because road construction is prohibited. The problem is more precise.

Roadlessness is one of the physical conditions that makes future Wilderness designation possible. Maintaining that condition indefinitely through national administrative prohibition can preserve land in a Wilderness-compatible state even where Congress previously determined that the land should remain available for non-Wilderness multiple use. In Utah, that concern cannot be dismissed as speculation about congressional intent because Congress spoke directly.

The Utah Wilderness Act found that some roadless lands warranted Wilderness protection. It found that others should remain available for energy, minerals, timber, grazing, dispersed recreation, and other multiple uses. It designated the former, released the latter to multiple-use management, and established a process for reconsidering Wilderness suitability through subsequent Forest Plan revisions (Utah Wilderness Act of 1984, §§ 101, 201). That is the institutional sequence UPLA believes should govern. Where Congress has designated Wilderness, manage it as Wilderness. Where a Forest Plan lawfully recommends land for Wilderness consideration, identify that land transparently and manage it under the authorities applicable to Recommended Wilderness. Where neither condition applies, the Forest Service should not preserve Wilderness suitability indirectly through an independent nationwide road prohibition.

#### **G. Utah's Experience Also Demonstrates Why Wilderness Boundaries Must Remain Meaningful**

Congress has repeatedly shown that it knows how to create Wilderness boundaries and how to specify the consequences outside them. That principle is reflected beyond the National Forest context in Utah's more recent federal land legislation. In the John D. Dingell, Jr. Conservation, Management, and Recreation Act, Congress expressly provided in connection with Wilderness designations that the designation was not intended to create a protective perimeter or buffer zone and that lawful non-Wilderness activities outside the boundary should not be precluded merely because they could be seen or heard from within Wilderness (John D. Dingell, Jr. Conservation, Management, and Recreation Act, Pub. L. No. 116-9, 2019).

Although those provisions concern different federal lands and do not govern the Roadless Rule, they reinforce a recurring congressional principle: a Wilderness boundary is supposed to mean something. UPLA believes the same principle should inform this rulemaking. Congressional designation should protect the lands inside a Wilderness boundary according to the Wilderness Act. It should not create an administrative expectation that surrounding multiple-use lands must gradually assume the same management character. Nor should a separate roadless classification be used to create an expanding belt of Wilderness-compatible management around designated areas where Congress has not imposed that restriction.

The integrity of Wilderness designation is strengthened, not weakened, when its boundaries are respected.

#### **H. Alternative 2 Would Restore the Distinction Congress Established for Utah**

Alternative 2 provides the clearest means of correcting this institutional drift. Full rescission would not remove Utah's congressionally designated Wilderness areas. It would not prevent the Forest Service from recommending appropriate lands for Wilderness during Forest Plan revision where applicable law provides for that process. It would not compel road construction, timber harvest, mineral development, or

motorized recreation in areas where those activities are environmentally inappropriate or inconsistent with a Forest Plan.

It would also remove a nationwide regulatory overlay that treats inventoried roadlessness itself as a basis for restricting transportation development across lands Congress has not designated as Wilderness. For Utah, that correction has particular significance because Congress already confronted this question in 1984. It examined the State's National Forest roadless lands, designated substantial acreage as Wilderness, and directed that other lands remain available for non-Wilderness multiple-use management. The Roadless Rule should not be allowed to obscure that legislative settlement.

UPLA therefore urges the Forest Service to select Alternative 2 and fully rescind the 2001 Roadless Area Conservation Rule. Utah does not need an administrative shadow Wilderness system layered across millions of acres of National Forest land. It needs clear distinctions among congressionally designated Wilderness, lands formally recommended for future Wilderness consideration, and lands available for multiple-use management. Congress established those distinctions for a reason. Federal land policy should respect them.

### **UTAH'S RESOURCE CONCERNS DO NOT JUSTIFY RETAINING A NATIONWIDE ROADLESS MANDATE**

UPLA recognizes that opposition to Alternative 2 in Utah is grounded in concerns that deserve consideration. Municipal watershed protection in the Central Wasatch, wildfire ignition, wildlife security, backcountry recreation, fiscal responsibility, and preservation of undeveloped landscapes are legitimate public-land issues. They should be evaluated with the seriousness warranted by the resources involved.

They do not, however, establish that Utah's National Forests require continued governance under the 2001 Roadless Rule.

Much of the opposition to rescission conflates removal of a regulatory prohibition with approval of the activities previously constrained by that prohibition. That premise materially exaggerates what Alternative 2 would accomplish. Rescission would not approve a timber sale, authorize a mine, construct an access road, expand a ski area, eliminate a Wilderness boundary, revise a Forest Plan, or waive environmental review. Future proposals would remain subject to applicable Forest Plan direction, statutory requirements, site-specific environmental analysis, engineering feasibility, funding, and resource constraints (USFS, 2026).

The issue before the Forest Service is consequently narrower, but also more consequential: whether these decisions should continue to be constrained in advance by a national rule covering nearly half of Utah's National Forest System lands, or whether Utah's individual forests should again be allowed to evaluate them according to the conditions actually present on the landscape.

UPLA supports the latter.

### **A. Rescission Does Not "Open" Four Million Acres to Unrestricted Development**

Utah opponents have repeatedly characterized rescission as opening more than four million acres to logging, mining, roads, and development. Similar claims have been made regarding the 28,500 acres of Roadless lands within the Central Wasatch Commission's geographic focus area (Central Wasatch Commission [CWC], 2025). That characterization collapses several separate federal decision processes into one.

Alternative 2 removes the Roadless Rule's prohibitions. It does not remove Forest Plan prescriptions governing those lands. It does not alter the Wilderness Act, National Forest Management Act, National Environmental Policy Act, Endangered Species Act, Clean Water Act, National Historic Preservation Act, or other applicable authorities. Nor does it convey federal land into private ownership.

The Forest Service has expressly stated that rescission itself would authorize no ground-disturbing project, require no timber harvest or road construction, and dictate neither the location nor timing of future activities. Those decisions would remain with local Forest Service officials and would require consistency with applicable Forest Plan direction and other legal requirements (USFS, 2026).

This matters particularly in Utah because the affected acreage is neither environmentally nor administratively homogeneous. A watershed above Salt Lake City does not present the same management conditions as a forested plateau on the Fishlake National Forest. A high-elevation recreation landscape in Little Cottonwood Canyon does not present the same transportation, grazing, vegetation, or community-access questions as National Forest lands adjoining rural central or southern Utah. A single regulatory answer for all of them sacrifices geographic precision for administrative simplicity.

UPLA does not support indiscriminate development of former IRAs. We support restoring the authority to decide what should happen in each one.

### **B. The Central Wasatch Watershed Argument Demonstrates the Need for Local Protection, not a National Prohibition**

One of Utah's most substantial arguments against rescission concerns drinking-water protection. The Central Wasatch Commission has identified 28,500 acres of Roadless lands within Big Cottonwood, Little Cottonwood, Mill Creek, and Parleys Canyons and argues that these lands contribute to municipal watersheds serving nearly 500,000 residents in Salt Lake City and surrounding communities. The Commission contends that rescission could jeopardize watershed protection and has advocated congressional protection through the proposed Central Wasatch National Conservation and Recreation Area (CWC, 2025).

UPLA agrees with the underlying proposition that municipal watersheds warrant rigorous protection. We disagree that protecting a particularly sensitive watershed requires maintaining a national road prohibition across millions of unrelated acres elsewhere in Utah. If the Central Wasatch requires specialized management because of its population exposure, watershed function, extraordinary recreation demand, topography, or existing development pressures, those conditions can and should be addressed through the

Uinta-Wasatch-Cache Forest Plan, watershed protections, project-specific analysis, local cooperative planning, or congressional designation where Congress determines additional statutory protection is warranted.

Indeed, the Central Wasatch Commission's own advocacy for the proposed Central Wasatch National Conservation and Recreation Area demonstrates the availability of that institutional pathway. The proposal would establish congressionally defined protections tailored to a specific landscape rather than relying upon the Roadless Rule as a nationwide surrogate (CWC, 2026).

The policy logic should not be reversed. The presence of an unusually sensitive watershed in the Central Wasatch does not justify imposing the same transportation restrictions on National Forest lands near Beaver, Marysvale, Richfield, Ephraim, Monticello, Vernal, or other rural Utah communities whose landscapes present different conditions and management needs. Protect the watershed according to the watershed.

### **C. Roads Can Increase Ignition Exposure, but Ignition Density Is Not a Complete Wildfire Strategy**

Utah opponents have also argued that rescission is unnecessary or counterproductive because human-caused ignitions are concentrated near roads. The Central Wasatch Commission has specifically relied upon the relationship between roads, human access, and ignition probability in opposing rescission (CWC, 2025). There is a significant flaw in this claim, however, the policy error occurs when ignition probability is treated as the sole measure of wildfire risk. Wildfire risk to a Utah community or watershed depends upon far more than where ignition occurs. Fuel structure, vegetation type, drought, topography, wind, treatment history, fire behavior, values at risk, suppression opportunities, evacuation capability, and access to the incident all influence the eventual consequence of an ignition.

Utah's recent fire history illustrates the point. The Brian Head Fire, Dollar Ridge Fire, Yellow Lake Fire, and other major incidents discussed in preceding sections of UPLA's comments differed substantially in ignition source, fuels, terrain, community exposure, access, suppression strategy, and post-fire effects. A national rule based primarily upon preventing roads cannot account for those differences.

Nor does UPLA contend that every fire-prone landscape needs more roads. A road that creates unnecessary public access into a high-ignition-risk location may be inappropriate. Another road may provide strategically important access for fuels treatment, prescribed fire preparation, suppression, evacuation, infrastructure protection, or post-fire rehabilitation. A third may provide no meaningful management benefit and should never be constructed.

Those are land-management determinations, not propositions capable of resolution through a nationwide binary classification. The Forest Service should evaluate ignition risk and management access together rather than assuming that either variable resolves the question by itself.

#### **D. Existing Fuels Work Within IRAs Does Not Demonstrate That the Roadless Rule Is Harmless**

Another argument raised in Utah is that fuels reduction already occurs within IRAs and therefore rescission is unnecessary. The Central Wasatch Commission has specifically argued that fuels-management and mitigation work is currently occurring within Roadless areas (CWC, 2025). That observation establishes only that the Rule does not prohibit every form of vegetation management. It does not establish that the Rule has no operational effect.

The relevant question is whether managers can use the treatment method, access configuration, equipment, treatment footprint, and long-term maintenance strategy most appropriate to a particular landscape. A project that can be accomplished under existing exceptions does not prove that every necessary treatment elsewhere in Utah can be accomplished efficiently or at meaningful landscape scale under the same limitations.

This is particularly important because Utah has made active forest management a central component of its Shared Stewardship strategy. State and federal partners are increasingly attempting to plan treatments across jurisdictional boundaries and at landscape scales rather than limiting work to isolated project footprints. Utah's Public Lands Policy Coordinating Office has consequently identified rescission of the Roadless Rule as complementary to the State's active-management and Shared Stewardship objectives (Utah PLPCO, 2026).

UPLA believes the proper inquiry is therefore not whether some treatment can occur under Alternative 1. It is whether the Roadless Rule unnecessarily restricts the range of management choices available where local conditions justify a different approach.

#### **E. Utah's Backcountry Recreation Economy Is Not Synonymous with Roadless Recreation**

Opponents also argue that rescission threatens Utah's outdoor-recreation economy by diminishing the undeveloped character that supports hiking, mountain biking, backcountry skiing, hunting, wildlife viewing, and other activities. Those uses unquestionably have substantial value. However, it is critical to call out with emphasis that they do not constitute the entirety of Utah's recreation economy.

Utah has developed one of the nation's most extensive motorized recreation cultures and transportation systems. On National Forest lands, recreation includes OHV trail systems, four-wheel-drive routes, dispersed camping, hunting access, motorized big-game retrieval where authorized, scenic driving, access to fishing and camping destinations, and community-connected trail systems. As documented in preceding sections, the Paiute and Arapen systems demonstrate how motorized access can function as recreation infrastructure linking federal lands directly with rural communities.

The appropriate recreation analysis therefore cannot begin with an assumption that fewer roads necessarily produce greater recreation value. In the Central Wasatch, maintaining large undeveloped backcountry landscapes may be an important recreation objective because of extraordinary demand for hiking, skiing, mountain biking, and other uses. On portions of the Fishlake or Manti-La Sal National

Forests, a connected motorized transportation system may carry equally substantial recreational and community value. Both can be true.

Alternative 2 allows the Forest Service to make that distinction geographically. Alternative 1 assumes that the same road prohibition is an appropriate starting point for both landscapes.

UPLA considers the former substantially more consistent with Utah's diversity of recreational use.

#### **F. Deferred Road Maintenance Is an Argument for Transportation Prioritization, Not Permanent Network Stagnation**

The Forest Service's substantial deferred-maintenance burden is frequently cited as evidence that rescission is fiscally irresponsible. The argument is intuitive: if the agency struggles to maintain existing roads, it should not construct additional ones.

We agree with the first premise but not the conclusion.

Transportation networks are not static assets. Existing roads may become obsolete, environmentally problematic, redundant, or too expensive to maintain. Other segments may become more important because recreation patterns, wildfire risk, restoration priorities, community needs, or land-management objectives change.

Responsible transportation management therefore requires the ability to modify the network. A short reroute may eliminate a chronically failing section. A strategically located connection may replace longer travel over several deteriorating roads. Temporary access may allow a restoration project to proceed without creating a permanent road-maintenance obligation. A road serving little public purpose may appropriately be decommissioned while another route receives greater maintenance investment.

Utah also has a well-established system of State OHV grants, county participation, volunteer labor, cooperative maintenance, and local recreation partnerships that can supplement federal capacity for designated recreation infrastructure. Those partnerships do not eliminate federal maintenance responsibilities, but they demonstrate why agency appropriations alone are an incomplete measure of transportation capacity.

The appropriate fiscal standard is straightforward: evaluate lifecycle costs and benefits before approving the project. The existence of deferred maintenance elsewhere does not justify making a 2001 transportation configuration permanent.

#### **G. Protecting Wildlife Does Not Require Treating Every Road as the Same Ecological Disturbance**

Wildlife fragmentation and displacement are also legitimate concerns associated with transportation development. UPLA supports meaningful evaluation of those effects. But "road" is not an ecological impact category with a uniform biological consequence. A paved highway carrying thousands of vehicles

per day is not biologically equivalent to a primitive Forest road receiving intermittent administrative or recreational use. A gated management road is not equivalent to an unrestricted through-route. A seasonal OHV trail is not equivalent to a year-round transportation corridor. Effects likewise vary by species, habitat type, season, road density, noise, speed, surrounding development, and existing disturbance. Utah makes these distinctions routinely in wildlife management. Seasonal restrictions can protect winter range or reproductive periods. Route location can avoid sensitive habitat. Designated-route systems can concentrate travel rather than allowing proliferation of unauthorized routes. Speed restrictions, educational measures, enforcement, reroutes, and habitat restoration can address particular effects without permanently eliminating transportation access.

UPLA favors analysis at that level of specificity.

If wildlife evidence demonstrates that a proposed road would create unacceptable effects that cannot be mitigated, the Forest Service can reject it under Alternative 2. Rescission does not reverse that authority. What it removes is the presumption that roadlessness itself is the necessary ecological outcome before the species, habitat, route, and proposed use have been examined.

#### **H. Claims of Widespread Commercial Logging Overstate What Alternative 2 Authorizes**

Another recurrent argument portrays rescission as a mechanism for converting Utah's IRAs into industrial timber-production landscapes. That description does not accurately characterize the proposed action. Rescission would not authorize a timber sale. It would not change the management prescription assigned to a particular area under an existing Forest Plan. It would not eliminate NEPA analysis or other environmental requirements governing future projects. It would remove the Roadless Rule's additional restrictions and permit vegetation-management proposals to be evaluated under the authorities otherwise applicable to the land.

This is an especially critical point within Utah because forest-management objectives frequently extend beyond commercial timber production. Aspen restoration, conifer encroachment treatment, hazardous-fuels reduction, insect and disease response, watershed restoration, prescribed-fire preparation, post-fire recovery, wildlife-habitat improvement, and maintenance of resilient forest structure may involve cutting or removing trees without having commodity production as their primary purpose.

We reject the premise that the environmental consequences of every activity involving timber removal are interchangeable. A forest-management action should be judged according to its purpose, treatment design, affected resources, landscape conditions, and anticipated outcomes. Where commercial harvest is appropriate under a Forest Plan and applicable environmental law, it should be evaluated on that basis. Where it is inappropriate, it should be rejected. Alternative 2 restores that analysis rather than dictating the answer nationally.

#### **I. The Central Wasatch Wilderness Argument Confirms Why Roadless Status Should Not Substitute for Congressional Designation**

Utah-based opposition to Rescission provides unusually candid evidence regarding another purpose served by the Roadless Rule. During Central Wasatch Commission discussions of rescission, participants expressed concern that construction of roads could make future Wilderness designation more difficult, including for the proposed Mount Aire/Grandeur Peak Wilderness associated with the proposed Central Wasatch National Conservation and Recreation Area legislation. Commission discussion expressly recognized that maintaining roadless conditions helps preserve lands as candidates for future Wilderness designation.

We appreciate the candor of that position. It also illustrates precisely the institutional concern addressed in the preceding section of our comments. If Congress wishes to designate additional Wilderness in the Central Wasatch, Congress possesses the authority to do so. If the Forest Service recommends particular lands for Wilderness through the applicable planning process, those lands can be identified and managed accordingly. What UPLA opposes is retaining a nationwide road prohibition across millions of acres partly because doing so preserves the political or administrative feasibility of future Wilderness designation.

Utah's congressional history makes that proposition particularly problematic. As explained previously, Congress considered Utah's RARE II lands in the Utah Wilderness Act of 1984, designated particular areas as Wilderness, and expressly directed that other reviewed lands remain available for non-Wilderness multiple-use management.

The possibility that an organization may someday seek Wilderness designation for a particular landscape does not justify maintaining Wilderness-compatible transportation restrictions across unrelated National Forest lands throughout Utah. Future Wilderness proposals should stand on their own merits.

#### **J. Public Support for the Roadless Rule Does Not Resolve the Forest Service's Statutory Obligation**

Opponents have also emphasized the large number of comments submitted in support of retaining the Rule. Public participation is an essential component of federal land management, and UPLA strongly supports meaningful opportunities for citizens, counties, recreation organizations, permittees, Tribes, conservation interests, and other affected parties to participate. NEPA, however, is not a plebiscite. The Administrative Procedure Act requires agencies to consider relevant comments and provide a reasoned basis for their decisions. NEPA requires informed analysis of environmental consequences and alternatives. Neither statute requires an agency to select whichever alternative receives the greatest number of form comments.

This is particularly important in a national rulemaking whose consequences are geographically uneven. Hundreds of thousands of comments submitted from across the United States cannot substitute for analysis of how the Roadless Rule operates on the Fishlake National Forest, how it affects management on the Manti-La Sal, how it interacts with recreation systems on the Ashley, or how it affects communities adjoining the Dixie and Uinta-Wasatch-Cache National Forests.

Public sentiment is relevant. Land-management decisions still require reasoned analysis.

### **K. Utah Law Expressly Rejects the Policy Premise Underlying Continued Roadless Expansion**

Utah's own public-land policy further distinguishes this State from the generalized national debate. Utah Code expressly states the State's opposition to additional evaluation of National Forest System lands as roadless or unroaded beyond RARE II and opposes special management of such lands where it closes or declassifies existing roads without specified local consent, permanently bars travel on existing roads, diminishes traditional multiple uses, interferes with valid existing rights, or prohibits additional roads reasonably necessary for traditional multiple-use activities (Utah Code § 63L-11-303).

That policy does not control the Forest Service's legal decision under federal law. It is nevertheless directly relevant evidence of Utah's governmental position regarding management of its National Forest landscapes. The State has chosen a policy favoring continued multiple-use availability, transportation access, recognition of existing rights, and local participation rather than indefinite administrative preservation of roadlessness.

UPLA's position is consistent with that approach.

### **L. Utah's Environmental Values Are Better Protected Through Precision Than Through Regulatory Uniformity**

The strongest arguments against rescission identify resources that unquestionably deserve protection. UPLA does not seek weaker watershed protection in the Cottonwood Canyons. We do not seek unnecessary roads in wildlife habitat. We do not advocate wasteful infrastructure, indiscriminate timber removal, or recreational access without regard for resource conditions. We reject the proposition that protecting those resources requires the Roadless Rule.

Utah contains municipal watersheds serving hundreds of thousands of people, high alpine environments, productive forests, pinyon-juniper landscapes, aspen systems, wildlife migration habitat, grazing allotments, major motorized recreation networks, ski areas, remote rural communities, and landscapes where active treatment is urgently needed. Those resources do not present one management problem, and they should not receive one predetermined management answer.

Alternative 2 restores the ability to distinguish among them. Where the Central Wasatch requires exceptional watershed protection, impose exceptional watershed protection. Where wildlife habitat requires seasonal limitations, establish them. Where a road would create unacceptable environmental effects, reject it. Where a route can be relocated to improve resource conditions, evaluate the relocation. Where a forest treatment requires temporary access, determine whether the ecological benefit justifies that access. Where a landscape should remain undeveloped, retain it in that condition through the Forest Plan and applicable project decisions. That is not an abandonment of conservation. It is conservation practiced through land management rather than regulatory proxy.

UPLA therefore concludes that the principal arguments offered against rescission do not establish a need to retain the 2001 Roadless Rule. They establish the need for competent Forest planning, rigorous environmental analysis, meaningful local participation, enforceable mitigation, and decisions responsive

to the characteristics of the individual landscape. Utah's National Forests are too diverse, and too important to the communities surrounding them, to remain governed by a single national presumption adopted 25 years ago.

UPLA urges the Forest Service to select Alternative 2 and fully rescind the Roadless Rule.

**RESCISSION MUST RESTORE UTAH'S MANAGEMENT AUTHORITY,  
NOT REPLACE ONE FEDERAL RESTRICTION WITH ANOTHER**

UPLA supports Alternative 2 and full rescission of the 2001 Roadless Area Conservation Rule. However, the effectiveness of rescission will depend upon what the Forest Service does after the national prohibition is removed. If the agency subsequently incorporates substantially identical restrictions into individual Forest Plans, regional management directives, special-area classifications, or new state-specific roadless regulations, Utah could remain subject to the same limitations under a different administrative structure.

Such an outcome would defeat a principal purpose of rescission: restoring the capacity of local Forest Service officials to make decisions based upon current resource conditions, demonstrated management needs, and the multiple-use requirements established by Congress.

Utah has a particular interest in preventing this outcome. The Roadless Rule has affected more than four million acres of National Forest System land in the State, encompassing landscapes with markedly different ecological conditions, transportation requirements, recreation opportunities, and relationships to surrounding communities. Replacing one national restriction with several forest-level restrictions would not necessarily restore meaningful management flexibility.

UPLA does not contend that every former Inventoried Roadless Area (IRA) should become available for road construction or intensive management. We contend that restrictions adopted after rescission must be independently justified. An area's historical inclusion in the 2001 roadless inventory should not, by itself, determine its future management.

**A. Utah's Congressional Wilderness Settlement Must Not Be Circumvented Through New Administrative Classifications**

Utah's legislative history makes this concern particularly significant. As addressed in the preceding section concerning administrative expansion of Wilderness-oriented management, Congress enacted the Utah Wilderness Act of 1984 after evaluating the State's National Forest roadless lands. Congress designated particular areas as Wilderness while expressly directing that other lands reviewed through RARE II remain available for non-Wilderness multiple-use management (Utah Wilderness Act of 1984, Pub. L. No. 98-428, §§ 101, 201).

Congress also established specific procedures governing subsequent Wilderness review during Forest Plan revision. The statute did not prohibit future Wilderness recommendations, but neither did it authorize

indefinite preservation of every previously inventoried roadless landscape as though Wilderness suitability were its controlling management purpose.

This history creates an important implementation obligation.

Following rescission, the Forest Service should not establish new management-area classifications or Forest Plan standards that effectively reinstate roadless preservation across lands Congress previously released for multiple-use management without an independent legal and factual justification.

We recognize that the 1984 Act does not prohibit all subsequent conservation-oriented Forest Plan decisions. Its significance lies in the distinction Congress established between lands designated or recommended for Wilderness and lands available for non-Wilderness management. That distinction should remain operative after Alternative 2 is implemented.

### **B. Utah's Existing Forest Plans Must Be Reviewed for Restrictions That Could Perpetuate the Former Rule**

Full rescission will not automatically eliminate restrictions independently established through existing Forest Plans. The Forest Service's proposed rule recognizes that land-management plans may continue to constrain road construction, reconstruction, and vegetation management after the national Roadless Rule is removed (USFS, 2026). UPLA therefore recommends that the Forest Service undertake a transparent review of existing plan direction affecting former IRA acreage on the Ashley, Dixie, Fishlake, Manti-La Sal, and Uinta-Wasatch-Cache National Forests.

That review should distinguish between restrictions independently justified by resource conditions or statutory requirements and restrictions whose primary rationale derives from maintaining the roadless characteristics protected under the former national Rule. The distinction is especially consequential on the Fishlake National Forest. The Forest Service's original Roadless Rule mapping identified 713,000 acres of Fishlake IRA land where pre-Rule Forest Plan direction permitted road construction or reconstruction, compared with 4,000 acres where such activities were prohibited (USFS, 2000). The Roadless Rule subsequently imposed its national prohibition notwithstanding those earlier management allocations.

After rescission, the agency should not presume that retaining the restrictions introduced by the national Rule is necessary merely because those restrictions have governed the landscape since 2001. Where the current Forest Plan independently establishes a restriction, it should remain legally operative until appropriately amended. Where reconsideration is warranted, the Forest Service should evaluate present conditions, resource objectives, transportation requirements, and reasonable management alternatives. UPLA requests an affirmative transition process rather than leaving the consequences of rescission to be determined inconsistently across Utah's five National Forests.

### **C. Utah Law Provides a Specific Standard Against Reestablishing Roadless Restrictions**

Unlike many states, Utah has adopted explicit statutory policy concerning additional roadless inventories and administrative restrictions on National Forest access. Utah Code § 63L-11-303(11) opposes additional

evaluations of National Forest lands as roadless or unroaded beyond RARE II and opposes special management that closes existing roads, permanently bars travel, diminishes traditional multiple uses, interferes with valid existing rights, or prohibits additional roads reasonably necessary for those uses. The statute further establishes conditions under which the State will support Forest Plan revisions and amendments. These include recognition of established roads, application of multiple-use management standards to lands adjoining those roads, and limitations on recognition of subsequent roadless inventories (Utah Code § 63L-11-303(12)).

These provisions do not supersede federal law or eliminate the Forest Service's statutory planning authority. They do, however, establish a clearly articulated State policy that should receive substantive consideration in future federal planning decisions.

UPLA recommends that the Forest Service expressly address these provisions in its implementation guidance and require Utah Forest Plan amendments affecting former IRAs to document their consistency or identified conflicts with applicable State and county land-use policies. The agency should not presume that a new restriction is appropriate merely because it resembles the management direction previously imposed by the Roadless Rule.

#### **D. Future State-Specific Roadless Petitions Could Undermine the Purpose of Rescission**

The proposed rule identifies another potential means through which restrictions could be reestablished. Following rescission, States, Tribes, and other interested entities may petition for geographically tailored roadless regulations under 5 U.S.C. § 553(e) and 7 C.F.R. § 1.28 (USFS, 2026). This authority is not inherently objectionable. UPLA recognizes the statutory right to petition federal agencies and the distinct government-to-government consultation rights of federally recognized Tribes. Nevertheless, a new Utah-specific Roadless Rule would warrant substantial scrutiny.

The existence of state-specific roadless regulations elsewhere does not establish that Utah requires one. Utah's legislative history, State land-use policies, county transportation systems, existing rights-of-way, recreation economy, and National Forest management priorities differ materially from those of other states. Any petition seeking to establish new roadless restrictions in Utah should therefore demonstrate why existing Forest Plans, environmental statutes, and project-specific management authorities are inadequate to protect the identified resources.

A petition should also disclose whether the proposed restrictions would preserve substantially the same boundaries and prohibitions as the rescinded Rule. Where that is the case, the Forest Service should explain why the restrictions remain necessary despite its determination that the national Rule should be rescinded.

The petition process must not become a mechanism through which organizations dissatisfied with Alternative 2 can reinstate the former restrictions incrementally without confronting the same substantive questions presented by the national rulemaking.

### **E. County Transportation Plans and Existing Rights-of-Way Must Be Addressed Before New Restrictions Are Considered**

One of Utah's most significant institutional concerns is the relationship between federal transportation planning and county road systems. Across rural Utah, roads crossing National Forest lands may serve county transportation functions, livestock operations, water infrastructure, search and rescue, emergency access, recreational destinations, and connections between public and private lands. Some routes may also implicate asserted or established rights-of-way under Revised Statute 2477. The existence and legal status of an R.S. 2477 right-of-way must be determined under applicable law. Federal administrative classifications should not be used to prejudge disputed rights or disregard legally established ones.

Utah Code § 63L-11-303 expressly identifies transportation access, R.S. 2477 rights, county transportation planning, and reasonable access to public resources as important State interests. It also establishes expectations for incorporation of State and county transportation plans into the information considered during Wilderness recommendations and federal land-management planning.

UPLA requests that any post-rescission Forest Plan amendment, special management designation, or roadless petition include an inventory of affected transportation corridors and a documented review of relevant county transportation plans. Where a proposed restriction could impair a claimed or established right-of-way, the agency should identify the potential conflict and provide an opportunity for the affected governmental entities and rights holders to participate before the decision is finalized.

This is particularly important where National Forest transportation networks connect with county roads, State lands, school and institutional trust lands, and federal lands managed by other agencies. A geographically confined federal planning decision can have transportation consequences extending far beyond the administrative boundary of the affected Forest.

### **F. Roadless Inventory Boundaries Should not Become Permanent Management Designations**

The continued existence of the 2001 IRA dataset presents a separate implementation concern. UPLA recognizes that historical roadless inventories may remain useful for documenting past planning decisions, environmental conditions, and changes in land use. Their continued availability as geospatial information should not confer continuing regulatory authority. An inventory identifies characteristics present at the time of evaluation. It does not establish that those characteristics must be preserved indefinitely, nor does it substitute for a contemporary decision about the appropriate management of the land.

Utah's National Forest landscapes have experienced substantial changes since the original roadless inventories were developed. Vegetation conditions, wildfire exposure, recreational demand, transportation requirements, restoration priorities, and community needs have evolved. The management relevance of those changes should be assessed through current evidence.

UPLA therefore recommends that the Forest Service distinguish clearly between retention of former IRA boundaries as historical data and use of those boundaries as the basis for future management

prescriptions. Any new restrictions should be geographically tailored to the resources requiring protection, rather than automatically encompassing an entire former IRA because the polygon already exists in the agency's mapping system.

### **G. Recommended Wilderness, Special Management Areas, and Other Planning Classifications Must Retain Their Distinct Legal Purposes**

The Forest Service possesses several administrative mechanisms for establishing management direction that may limit road construction or other activities. These include Forest Plan management areas, geographic areas, Recommended Wilderness, designated special areas, and resource-specific standards. UPLA does not contend that rescission invalidates those authorities. Our concern is that the authorities could be employed interchangeably to achieve the same broad preservation objective previously imposed through the Roadless Rule.

Recommended Wilderness should be evaluated and managed according to the legal requirements governing Wilderness recommendations. Watershed protections should be supported by hydrologic evidence. Wildlife restrictions should address identifiable species and habitat concerns. Recreation management should account for the particular opportunities and experiences the agency intends to provide. The Forest Service should not rely upon generalized preservation of roadlessness as a substitute for these separate analyses.

This concern is especially relevant where multiple administrative classifications overlap. A former IRA may also contain an area recommended for Wilderness, a municipal watershed, a wildlife management area, or a primitive recreation setting. Each classification should retain its own purpose, geographic scope, and supporting rationale.

The cumulative restrictions should also be evaluated. Otherwise, successive administrative decisions can produce a level of exclusion greater than any individual decision expressly contemplated, without a corresponding analysis of the combined effects on transportation access and other multiple uses.

### **H. Utah's Five National Forests Require a Coordinated Transition Rather Than Five Different Interpretations of Rescission**

We are particularly concerned about inconsistent implementation among the Ashley, Dixie, Fishlake, Manti-La Sal, and Uinta-Wasatch-Cache National Forests. Each Forest has distinct management priorities, but the legal consequences of rescission should not depend upon which administrative unit interprets the final rule. For example, one Forest should not treat former IRA status as historical information while another treats the same designation as presumptive justification for continued road restrictions. Nor should Forest Plan amendments proceed under inconsistent evidentiary standards for determining whether roadless characteristics require preservation.

We therefore recommend that the Intermountain Region establish consistent implementation guidance addressing the legal status of former IRA boundaries, existing Forest Plan restrictions, future amendments, transportation inventories, State and county coordination, and public participation. This

guidance should establish procedural consistency without imposing new substantive restrictions. Uniformity in legal interpretation is appropriate. Uniformity in land-management outcomes is not.

### **I. Post-Rescission Planning Must Provide Meaningful Participation for Utah's Recreation and Stewardship Communities**

UPLA's members and affiliated organizations possess substantial practical knowledge of Utah's National Forest roads, trails, recreation corridors, and access requirements. That knowledge should be incorporated into decisions affecting former IRA acreage. Forest Plan amendments and other administrative actions should provide sufficient geographic information for affected users to determine which routes, trailheads, dispersed camping areas, and transportation connections may be affected. Broad descriptions of proposed management objectives are insufficient when the practical consequences depend upon individual routes or connections.

UPLA recommends that planning notices identify affected transportation corridors using Forest Service route numbers and appropriate maps, disclose existing and proposed management restrictions, and explain how those restrictions would affect current and reasonably foreseeable access. Public involvement should occur early enough to influence the development of alternatives. The Forest Service should also preserve applicable administrative review and objection opportunities under 36 C.F.R. Part 219. A decision to reinstate substantial Roadless-style restrictions should not evade meaningful review merely because the restrictions are adopted through several smaller planning actions rather than one comprehensive amendment.

### **J. The Final Decision Should Establish Measurable Implementation Safeguards**

UPLA requests that the Forest Service accompany Alternative 2 with a clear implementation framework addressing the risk of administrative reconstitution. That framework should require the agency to identify existing Forest Plan restrictions affecting former IRA acreage, distinguish independently justified restrictions from those derived principally from the former national Rule, and establish a transparent process for evaluating whether amendments are appropriate. Future restrictions should be supported by contemporary resource-specific evidence and an explanation of why less restrictive management measures would be insufficient.

The Forest Service should also require analysis of cumulative effects where successive plan amendments or administrative designations affect the same transportation network or geographic area.

For Utah, implementation monitoring should include coordination with the State, affected counties, Tribes, recreation organizations, permittees, and other stakeholders. It should also document the acreage subject to newly adopted Roadless-style restrictions, the legal authority invoked, the stated management purpose, and the transportation access affected.

UPLA further recommends that the Forest Service publish periodic implementation reports sufficient to determine whether rescission has restored meaningful management discretion or whether substantially equivalent restrictions are being reestablished through other administrative instruments.

These safeguards can be implemented without directing the outcome of individual land-management decisions. Their purpose is to ensure that those decisions remain genuinely individualized.

#### **K. Alternative 2 Must Produce a Substantive Change in Utah's Land-Management Framework**

The effectiveness of rescission should not be measured solely by removal of the national Roadless Rule from the Code of Federal Regulations. If former IRA boundaries continue to operate as presumptive exclusion zones, if new Forest Plan standards automatically reproduce the previous prohibitions, or if successive petitions restore comparable restrictions across Utah's National Forests, the practical consequences of rescission will be substantially diminished. That outcome would be inconsistent with the stated objective of returning management decisions to local Forest Service officials (USFS, 2026).

UPLA supports local discretion because Utah's National Forests require decisions responsive to their particular circumstances. We do not support transferring the former national restrictions into a decentralized system that reaches the same predetermined conclusions. Where the evidence demonstrates that a landscape should remain undeveloped, the Forest Service may reach that conclusion through its established planning authorities. Where road reconstruction, route relocation, restoration access, or additional transportation infrastructure is warranted, the agency should retain the ability to evaluate those options without an inherited presumption against them.

The governing principle should be neither mandatory development nor mandatory preservation of roadlessness. It should be the exercise of federal land-management authority according to current conditions, applicable law, demonstrated resource needs, and the multiple-use responsibilities assigned by Congress.

UPLA therefore urges the Forest Service to select Alternative 2 and establish post-rescission implementation direction ensuring that the Roadless Rule is not subsequently reconstructed through Forest Plan amendments, administrative designations, regional policies, or geographically tailored rulemakings. Full rescission should restore a meaningful range of management alternatives for Utah's National Forests. It should not merely change the administrative instrument through which those alternatives are restricted.

#### **COORDINATING ROADLESS RULE RESCISSION WITH REFORM OF THE TRAVEL MANAGEMENT FRAMEWORK**

UPLA supports Alternative 2 because rescission of the 2001 Roadless Area Conservation Rule should restore management options that have been unavailable across millions of acres of Utah National Forest lands. That objective will be incomplete, however, unless the Forest Service coordinates Roadless Rule rescission with its concurrent reconsideration of the Travel Management Rule. The two regulatory frameworks perform different legal functions, but they converge on the same physical transportation network and, consequently, on the ability of Utah residents and visitors to reach, use, maintain, and steward National Forest lands.

The distinction is consequential. The Roadless Rule restricts specified road construction and reconstruction within Inventoried Roadless Areas (IRAs), while the Travel Management Rule governs designation of roads, trails, and areas for motor vehicle use. Rescission therefore does not, by itself, place an existing road or trail on a Motor Vehicle Use Map (MVUM), restore a previously closed route, or authorize public motorized travel. Conversely, a route designated for motorized use may provide little practical access if the Forest Service cannot reconstruct, relocate, connect, or adequately maintain the transportation infrastructure necessary to keep it functional.

Utah's transportation system illustrates why those authorities should no longer be administered in isolation. The State's National Forests support nationally significant OHV trail systems, community-to-public-land connections, hunting and dispersed camping access, grazing and permittee access, emergency response, wildfire management, and transportation corridors that intersect county roads and other federal and State lands. The effectiveness of Travel Management reform will therefore depend in part upon whether Alternative 2 restores the physical management options necessary to support the transportation system those regulations govern.

#### **A. Rescission and Travel Management Reform Address Different Regulatory Barriers to the Same Access System**

The Forest Service's August 24, 2026 Travel Management notice proposes substantial changes to the framework governing public access to National Forest System lands. Among other reforms, the agency proposes reconsideration of the existing minimum-road-system standard, changes to route-designation procedures, annual review of closed or highly restricted access routes, greater flexibility for certain designation changes, and reconsideration of regulatory provisions derived from the minimization criteria historically associated with Executive Orders 11644 and 11989 (USFS, 2026b). These proposals are particularly significant following the May 29, 2026 rescission of those Executive Orders. The Forest Service now has an opportunity to reconsider transportation policy without perpetuating regulatory presumptions inherited from a federal access framework that is itself being dismantled.

Roadless Rule rescission addresses a separate impediment. A Travel Management decision can determine that motorized access is appropriate without resolving whether the underlying route can physically be constructed, reconstructed, or relocated within an IRA. Likewise, rescinding the Roadless Rule can restore authority to consider transportation improvements without determining whether the resulting facility should be designated for public motor vehicle use.

UPLA urges the Forest Service to coordinate these decisions explicitly. The agency should not remove one regulatory impediment while leaving another administrative process incapable of implementing the resulting management alternatives.

#### **B. Utah's Community-Connected Trail Systems Require Transportation Policy That Recognizes Networks Rather Than Isolated Routes**

Utah provides particularly strong examples of why transportation infrastructure must be evaluated as a network. The Paiute ATV Trail system traverses portions of the Fishlake National Forest and connects

public lands with communities throughout central Utah. The larger trail system incorporates hundreds of miles of designated routes and community connections serving destinations including Marysvale, Richfield, Salina, Fillmore, Circleville, and surrounding communities. The Arapeen Trail system on the Manti-La Sal National Forest likewise depends upon interconnected Forest roads and motorized trails extending across the Wasatch Plateau and connecting with communities on both sides of the Forest. These systems do not function as collections of unrelated route segments. Their recreation value derives substantially from connectivity.

A relatively short closure can eliminate a loop, sever a community connection, prevent access to dispersed camping or other recreation destinations, or redirect traffic onto longer and potentially less suitable routes. Likewise, the environmental solution to a deteriorating route may require a short relocation rather than abandonment of the connection. The Roadless Rule complicates this problem where an otherwise appropriate transportation adjustment constitutes prohibited road construction or reconstruction within an IRA. Alternative 2 would remove that additional categorical constraint and permit the Forest Service to evaluate the actual environmental and transportation consequences of the proposed solution.

Travel Management reform should provide the corresponding administrative mechanism for modifying the route designation where appropriate.

UPLA therefore recommends that transportation decisions affecting the Paiute, Arapeen, and comparable Utah systems expressly analyze network connectivity, community access, loop opportunities, adjoining jurisdictions, and the consequences of removing individual links from the larger system.

### **C. Route Rehabilitation and Realignment Should Be Treated as Management Tools, Not as Functional Route Closures**

Utah's terrain creates recurring transportation-management challenges. Steep grades, erosive soils, flash flooding, wildfire, snowmelt, drainage failures, and concentrated runoff can damage roads and trails even where recreational use itself is appropriately managed. Under those conditions, a binary choice between retaining a deteriorating alignment and closing the route is poor land management. A short realignment may move a trail away from an unstable slope. Reconstruction may correct chronic drainage failure. A hardened crossing may reduce sediment delivery. A replacement connection may allow rehabilitation of an environmentally inferior segment while preserving the transportation function served by the route.

UPLA has consistently advocated management before closure because a transportation problem and a recreation problem are not necessarily the same thing. A deficient alignment can often be corrected without eliminating the public use dependent upon it. Alternative 2 is relevant because the Roadless Rule can prevent consideration of precisely these types of solutions where the necessary work constitutes construction or reconstruction outside its enumerated exceptions. Travel Management reform should complement rescission by ensuring that a limited relocation or corrective connection can be incorporated efficiently into the designated system once its environmental consequences have been evaluated.

The regulatory framework should facilitate correction of deficient infrastructure rather than create incentives to leave a failing alignment in place until closure becomes the easiest administrative outcome.

#### **D. The Revised Transportation Standard Should Measure Adequacy, Not Merely Minimize Mileage**

The proposed revision of 36 C.F.R. § 212.5 is especially consequential for Utah. The existing minimum-road-system framework has encouraged transportation analysis centered heavily upon identifying the smallest network considered necessary for administration and resource management. The proposed Travel Management reforms would instead establish criteria for evaluating an adequate and appropriate transportation system, including public access, resource conditions, safety, maintenance capability, and applicable Forest Plan requirements (USFS, 2026b). UPLA supports that change. Mileage alone is a poor measure of transportation efficiency. Ten disconnected miles can provide less public and administrative value than a strategically located two-mile connection. Conversely, an environmentally problematic road may add substantial mileage while serving little legitimate transportation purpose.

Utah's National Forest transportation system should therefore be evaluated according to function. Relevant considerations include community connectivity, access to recreation destinations, hunting and dispersed camping opportunities, administrative and permittee needs, wildfire response, maintenance feasibility, connections to county transportation systems, and the availability of alternative routes. Roadless Rule rescission is integral to making that evaluation meaningful. If a responsible official determines that a short connection, relocation, or reconstructed segment is necessary to create an adequate transportation system but the Roadless Rule independently prohibits the physical work, the transportation analysis becomes largely academic. Alternative 2 removes that contradiction.

#### **E. Existing Closures Should Be Reexamined Where the Regulatory Basis or Available Management Alternatives Have Changed**

The proposed Travel Management reforms contemplate recurring review of closed and highly restricted access routes (USFS, 2026b). UPLA strongly supports that direction and recommends that implementation specifically address former IRA lands following Roadless Rule rescission. A prior closure should not become administratively permanent merely because reopening was infeasible under the regulatory framework existing when the decision was made. Where a route was closed because reconstruction, relocation, mitigation, or restoration of connectivity could not lawfully or practically be accomplished under the Roadless Rule, Alternative 2 may materially alter the range of reasonable alternatives. The Forest Service should be required to consider that changed circumstance during subsequent closure review.

This requires reconsideration of the factual predicate supporting continued closure. The inquiry should include whether the original resource concern still exists; whether contemporary engineering, mitigation, or restoration techniques can address it; whether an alternative alignment is available; whether the closure interrupts an established recreation or community connection; and whether changed federal policy now permits an alternative that was previously unavailable. That review is particularly appropriate for Utah because the transportation system serves uses extending well beyond recreational driving. The same route can provide access for hunters, ranchers, dispersed campers, search-and-rescue personnel, fire crews,

permittees, and land managers. The consequences of closure should therefore be evaluated according to the full transportation function of the route.

#### **F. Travel Management Reform Should Implement the Federal Withdrawal from the Former Minimization Regime**

The relationship between Roadless Rule rescission and Travel Management reform extends beyond physical road construction. The May 29, 2026 executive action rescinding Executive Orders 11644 and 11989 removed the presidential directives from which the longstanding motorized-use minimization criteria originated. The Forest Service's subsequent Travel Management proposal appropriately recognizes that the agency must reconsider regulatory provisions developed under those rescinded directives (USFS, 2026b).

UPLA urges the Forest Service to complete that reform rather than preserve the former minimization framework through slightly revised terminology. The historical minimization criteria have too often been applied as though motorized recreation begins from a presumption of environmental conflict that must be minimized geographically, rather than as a congressionally recognized multiple use to be managed alongside other legitimate uses and resource values. Route-specific environmental impacts should continue to be analyzed and mitigated. The rescission of the underlying Executive Orders, however, provides an opportunity to replace an exclusion-oriented regulatory architecture with standards centered on sustainable transportation management.

Roadless Rule rescission advances the same institutional correction from another direction. One reform removes a categorical limitation on transportation infrastructure across IRAs. The other can remove an inherited regulatory preference for minimizing motorized access when determining where that infrastructure may be used by the public. Together, these reforms can restore a more balanced relationship between transportation management and multiple use.

#### **G. Dispersed Camping and Hunting Access Require a Transportation System Designed Around Actual Utah Recreation**

The proposed Travel Management revisions also address limited motor vehicle use associated with dispersed camping, retrieval of legally harvested big game, firewood collection, and related activities (USFS, 2026b). These are not peripheral uses in Utah. National Forest recreation frequently occurs beyond developed campgrounds and formal trailheads. Hunters, families camping on public lands, OHV users, anglers, and other visitors depend upon a combination of designated roads, trails, and limited access corridors to reach dispersed destinations. A transportation policy that recognizes only travel along the centerline of an existing designated route does not necessarily accommodate the way these lawful activities occur on the ground.

UPLA supports clear standards distinguishing authorized access from unrestricted cross-country travel. Those standards should nevertheless be sufficiently practical to allow dispersed recreation to remain viable. Roadless Rule rescission contributes to this objective where deficiencies in the existing transportation network require physical correction. A designated dispersed-camping corridor is of limited

value if the connecting road cannot be reconstructed after damage. Big-game retrieval provisions provide little benefit where access to the underlying route network has been severed. Likewise, a recreation destination may remain technically available while becoming practically inaccessible because the transportation connection serving it cannot be restored.

The Forest Service should evaluate these relationships together rather than treating designation, physical infrastructure, and dispersed-use access as separate administrative subjects.

## **H. County Roads and R.S. 2477 Interests Require Early Coordination in Utah Travel Management Decisions**

Utah's transportation setting also differs from many other National Forest landscapes because federal roads and trails frequently intersect county transportation systems and routes subject to asserted or adjudicated rights under Revised Statute 2477. Travel Management decisions should not presume federal authority to extinguish, restrict, or redesignate a valid nonfederal right-of-way merely because the route crosses National Forest System land. Conversely, the existence of an asserted R.S. 2477 claim does not, without the requisite legal determination, resolve the status of the right.

The practical requirement is early coordination. Before changing the designation or physical configuration of a route that intersects a county transportation corridor or potentially implicates an R.S. 2477 right-of-way, the Forest Service should consult the affected county and identify the jurisdictional status of the route to the extent reasonably possible. This is especially important following Roadless Rule rescission because transportation alternatives previously excluded from consideration may again become feasible. Those alternatives should be developed with an accurate understanding of county connectivity, jurisdiction, emergency access, and adjoining transportation systems.

Utah law expressly identifies county transportation plans, R.S. 2477 rights, public access, and transportation necessary for multiple use as significant State interests (Utah Code § 63L-11-303). Those interests should be integrated into implementation of both Alternative 2 and Travel Management reform rather than addressed after a federal transportation decision has effectively been made.

## **I. Route Evidence Should Be Used to Recover Legitimate Transportation History**

UPLA also supports the Travel Management proposal's recognition of contemporary geospatial information, including aerial imagery and other evidence capable of documenting the physical existence and historical use of roads and trails (USFS, 2026b). Utah contains many routes whose histories predate modern Forest Service transportation databases, digital mapping, and the current Travel Management framework. Historic maps, county records, aerial photography, maintenance records, permit documents, recreation maps, and credible user evidence can therefore provide information absent from contemporary Forest Service datasets. Such evidence should be considered when the Forest Service evaluates whether a route historically existed, what transportation function it served, and whether inclusion in the contemporary system is warranted.

This is particularly important where prior administrative inventories or incomplete datasets have contributed to loss of connectivity. Alternative 2 may restore the physical ability to reconstruct or reconnect a historic transportation corridor. Travel Management reform should provide an evidentiary process capable of determining whether that corridor belongs in the designated system.

#### **J. The Combined Reforms Should Expand Practical Access for People with Disabilities**

We have separately addressed disability access as a substantive public-land concern earlier in this comment letter. The interaction between these two rulemakings makes the issue especially relevant to transportation policy. For many visitors with mobility impairments, motorized access is not interchangeable with hiking access. A trailhead, overlook, dispersed campsite, fishing location, hunting area, historic site, or backcountry destination that can be reached only by substantial pedestrian travel may be functionally unavailable regardless of whether the land is nominally open to the public.

Roadless Rule rescission can restore the Forest Service's ability to consider transportation improvements necessary to reach such destinations. Travel Management reform can determine whether those roads and trails are available for appropriate public motor vehicle use.

UPLA therefore urges the Forest Service to consider the combined effects of these rulemakings under Section 504 of the Rehabilitation Act and applicable federal accessibility requirements. The agency should also account for the policy direction reflected in the proposed Outdoor Americans with Disabilities Act, which seeks to expand meaningful access to federal outdoor recreation opportunities. Accessibility analysis should address actual reachability, not merely whether the destination itself remains legally open.

#### **K. Utah Needs One Coherent Transportation Policy Following Rescission**

Implementation should ultimately produce a transportation framework that functions coherently across the Ashley, Dixie, Fishlake, Manti-La Sal, and Uinta-Wasatch-Cache National Forests. UPLA recommends that the Intermountain Region establish coordinated implementation direction addressing the relationship among former IRA lands, Forest Plan direction, construction and reconstruction authority, motor vehicle designation, MVUM updates, route realignment, closure review, county transportation systems, and dispersed-use access. The objective should not be identical transportation outcomes on every Forest. The Ashley National Forest and Fishlake National Forest do not have identical transportation needs. The Wasatch Plateau does not present the same recreation patterns, vegetation conditions, community relationships, or transportation demands as the High Uintas or Boulder Mountain. Administrative consistency should concern the rules governing the decision, not predetermined results.

UPLA recommends that the final Roadless Rule decision and subsequent Travel Management rulemaking establish several complementary principles. Rescission should remove the Roadless Rule as an independent prohibition on otherwise lawful road construction and reconstruction. Travel Management decisions should evaluate network connectivity rather than isolated route mileage. Closure reviews should consider whether Alternative 2 makes reconstruction, relocation, or mitigation alternatives newly feasible. Route adjustments should receive procedures proportionate to their actual environmental effects. County transportation interests and potentially applicable R.S. 2477 rights should be identified early. Motorized

dispersed recreation and disability access should be treated as substantive transportation considerations rather than secondary consequences. Most importantly, neither rulemaking should recreate the presumptions of the regulatory system it is intended to reform.

#### **L. Rescission and Travel Management Reform Should Restore the Forest Service's Capacity to Manage Access**

For UPLA, the relationship between these rulemakings ultimately concerns whether National Forest transportation policy will once again function as management rather than attrition. A route network cannot remain useful merely because lines remain printed on an MVUM. Roads and trails deteriorate. Wildfires alter landscapes. Floods destroy crossings. Recreation patterns change. Environmental problems emerge. Communities develop new access needs. Some alignments cease to be sustainable while better alternatives become available. A functional transportation system must be capable of responding to those changes.

The Roadless Rule has constrained the physical side of that response across millions of acres in Utah. The existing Travel Management framework has separately constrained how motorized routes are designated, modified, and reconsidered. Alternative 2 and Travel Management reform provide an opportunity to address both problems.

UPLA therefore urges the Forest Service to fully rescind the 2001 Roadless Rule and coordinate implementation with comprehensive Travel Management reform. The resulting framework should permit responsible officials to maintain, reconstruct, relocate, connect, and designate transportation infrastructure according to contemporary conditions, legitimate public access needs, environmental requirements, and the multiple-use responsibilities assigned to the Forest Service by Congress. Utah's National Forest transportation system should be capable of evolving with the lands and communities it serves. A regulatory structure that can only subtract access, but cannot efficiently repair, relocate, reconnect, or restore it, is not sustainable transportation management.

#### **SUMMARY OF REQUESTED ACTION AND IMPLEMENTATION PRIORITIES**

For the reasons developed throughout these comments, UPLA urges the Forest Service to select Alternative 2 and fully rescind the 2001 Roadless Area Conservation Rule. For Utah, rescission should restore meaningful management discretion across National Forest lands that have remained subject to a national regulatory framework poorly suited to the State's varied landscapes, transportation systems, recreation networks, rural communities, and active-management needs. UPLA specifically requests that the Forest Service:

- **Select Alternative 2 and fully rescind the 2001 Roadless Rule without retaining its principal restrictions through a modified alternative.** The final decision should eliminate the nationwide regulatory overlay and restore land-management decisions to the Forest planning and project-level processes established under existing federal law.
- **Return management of Utah's former IRA lands to the multiple-use framework applicable to non-Wilderness National Forest lands.** Road construction, reconstruction, vegetation

treatment, recreation infrastructure, grazing access, watershed work, and other management actions should be evaluated according to current conditions and applicable law rather than former IRA status.

- **Respect the congressional disposition of Utah's National Forest roadless lands.** Implementation should recognize the significance of the Utah Wilderness Act of 1984, including Congress's designation of selected lands as Wilderness and its direction concerning RARE II lands not designated as Wilderness. Administrative roadlessness should not become a substitute for congressional Wilderness designation.
- **Reject continued management of former IRAs as de facto Wilderness buffers or reserves for potential future Wilderness designation.** Preservation of future Wilderness eligibility should not independently justify restrictions on lawful multiple uses outside congressionally designated Wilderness.
- **Restore active-management options necessary for Utah's forest-health and wildfire-resilience objectives.** Responsible officials should be able to evaluate transportation access needed for fuels reduction, prescribed-fire preparation, vegetation restoration, insect and disease treatment, watershed work, post-fire recovery, and other management activities according to the conditions present on each Forest.
- **Evaluate wildfire risk comprehensively rather than equating roadlessness with fire protection.** Future decisions should consider ignition probability alongside fuel conditions, fire behavior, treatment access, suppression capability, evacuation, community exposure, watershed consequences, and post-fire recovery needs.
- **Protect the integrity and connectivity of Utah's motorized recreation networks.** Transportation decisions affecting systems such as the Paiute and Arapen should account for community connections, loop opportunities, dispersed recreation access, adjoining routes, trailheads, and the disproportionate consequences that closure of a short connecting segment can impose upon a much larger network.
- **Favor active route management over closure where resource concerns can reasonably be corrected.** Reconstruction, relocation, drainage improvements, hardened crossings, seasonal limitations, engineering treatments, restoration, signing, and enforceable use restrictions should receive meaningful consideration before established access is eliminated.
- **Recognize Utah's county transportation systems and valid existing rights.** Post-rescission decisions should include early coordination with affected counties and careful consideration of county transportation plans, jurisdictional interests, and established or asserted R.S. 2477 rights without prejudging unresolved claims.
- **Treat rural community access as a substantive land-management consideration.** Utah National Forest roads and trails frequently support recreation, grazing, hunting, dispersed camping, firewood collection, search and rescue, emergency response, and connections between federal lands and rural communities. Those functions should be evaluated together rather than compartmentalized.
- **Account for the economic importance of public-land access to Utah's gateway communities.** Decisions affecting transportation and recreation should evaluate consequences for communities whose visitor economies depend upon OHV recreation, hunting, camping, fishing, outfitting, lodging, fuel purchases, restaurants, retail activity, and related services.

- **Ensure meaningful access for people with disabilities and mobility limitations.** Motorized access should not be treated as interchangeable with pedestrian access where physical limitations make nonmotorized travel impracticable. Transportation planning should account for Section 504 of the Rehabilitation Act, applicable accessibility requirements, and relevant federal accessibility policy.
- **Do not reconstruct the Roadless Rule through Utah Forest Plans or other administrative mechanisms.** Former IRA status should not independently justify new management-area prescriptions, plan standards, regional directives, special classifications, or other restrictions that reproduce the substance of the rescinded national Rule.
- **Require contemporary, resource-specific evidence for restrictions proposed after rescission.** Future limitations should identify the resource or management problem being addressed, establish the geographic relationship between that problem and the proposed restriction, evaluate reasonable alternatives, and explain why less restrictive measures are inadequate.
- **Do not preserve former IRA boundaries as permanent land-use allocations.** Historical IRA mapping may remain useful as agency data, but it should not confer an enduring presumption against roads, management activity, or motorized access after the regulatory basis for that presumption has been rescinded.
- **Prevent "roadless character" from becoming a substitute regulatory standard.** Where the agency seeks to protect wildlife habitat, watershed function, scenery, cultural resources, primitive recreation, or another identifiable value, it should analyze and manage that resource directly rather than relying upon roadlessness as a generalized proxy.
- **Apply heightened scrutiny to any petition seeking a new Utah-specific roadless regulation.** Any such proposal should demonstrate why existing Forest Plan authorities and resource-specific laws are inadequate, identify its effects on transportation and multiple use, and evaluate alternatives that do not recreate the former national prohibition.
- **Coordinate implementation across the Ashley, Dixie, Fishlake, Manti-La Sal, and Uinta-Wasatch-Cache National Forests.** The Intermountain Region should provide consistent guidance concerning the legal consequences of rescission while preserving the ability of individual Forests to reach different management outcomes based upon local conditions.
- **Integrate Roadless Rule rescission with Travel Management reform.** The Forest Service should coordinate road construction and reconstruction authority with motor vehicle designation, MVUM administration, closure review, route modification, dispersed-use access, and transportation-system planning.
- **Reevaluate closures where Alternative 2 changes the available management alternatives.** Routes should not remain closed through administrative inertia where reconstruction, relocation, mitigation, or restoration of connectivity becomes feasible following rescission. Reconsideration should be evidence-based and should evaluate the continuing basis for the restriction.
- **Replace transportation attrition with functional network management.** Utah's National Forest transportation systems should be evaluated according to connectivity, public access, management utility, emergency response, environmental performance, maintenance feasibility, and relationships with county and community transportation networks rather than road mileage alone.
- **Use Utah's recreation and stewardship communities as management partners.** Local clubs, OHV organizations, counties, volunteers, permittees, and other stakeholders possess substantial

route-specific knowledge and can contribute maintenance, monitoring, restoration, education, and stewardship capacity that should be incorporated into transportation and recreation planning.

- **Provide meaningful route-level public participation.** Planning documents should identify affected roads and trails with sufficient geographic specificity for users, counties, communities, and other stakeholders to understand the practical consequences of proposed restrictions and contribute relevant local information before decisions are finalized.
- **Monitor post-rescission implementation for administrative reconstitution.** The Forest Service should disclose the acreage of former IRAs subsequently subjected to new Roadless-style restrictions, the authority and rationale supporting those restrictions, and their effects on transportation and multiple-use opportunities.
- **Implement rescission as a genuine change in management policy.** Alternative 2 should restore the Forest Service's capacity to choose among management alternatives rather than replacing a national prohibition with forest-level restrictions that produce substantially the same predetermined result.

UPLA's requested action is ultimately straightforward: **select Alternative 2, fully rescind the 2001 Roadless Rule, and return Utah's and the nation's National Forests to a management framework in which decisions are made according to current conditions, applicable law, local knowledge, and the multiple-use responsibilities established by Congress.**

### CLOSING

UPLA strongly urges the Forest Service to select Alternative 2 and fully rescind the 2001 Roadless Area Conservation Rule. Utah's National Forests should no longer be constrained by a 25-year-old national regulatory regime that restricts the transportation infrastructure, active management, wildfire response, recreation access, and multiple-use opportunities necessary to responsibly manage these lands. Congress has already exercised its authority to designate Wilderness in Utah, and lands outside those congressionally designated boundaries should not be subjected to an enduring administrative substitute for Wilderness. Full rescission will restore the Forest Service's ability to manage Utah's National Forests according to present conditions, local needs, statutory multiple-use mandates, and the transportation and access requirements of the communities that depend upon these lands.

UPLA further urges the Forest Service to ensure that Alternative 2 produces a substantive and durable change in federal policy. Former IRA boundaries must not become permanent administrative land allocations, and the restrictions of the Roadless Rule should not be reconstructed through Forest Plan provisions, regional directives, new administrative classifications, Wilderness buffer policies, or Utah-specific roadless regulations. Utah needs more active management, stronger and better-connected public access, functional transportation networks, greater capacity for wildfire prevention and response, and federal land management that recognizes recreation, grazing, resource use, and rural community access as legitimate and essential uses of National Forest lands. UPLA asks the Forest Service to select Alternative 2, complete full rescission without qualification or administrative substitution, and restore Utah's National Forests to the multiple-use management framework Congress intended.

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:

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Sincerely,

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

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