



# FRIENDS OF DOUGLAS-FIR NATIONAL MONUMENT



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from Milo Mecham, President, Friends of Douglas-Fir National Monument

As we warned, the Trump administration has started the process of eliminating the Roadless Area Conservation Rule. This Rule protects more than 44 million acres from most logging and roading, including several areas in the proposed Douglas-Fir National Monument. The formal process starts now with a published notice of intent (NOI) to eliminate the rule. The next step will be to take the NOI, and any comments on the NOI, to create a draft Environmental Impact Statement (EIS). This is projected to come out by March 2026. Comments will be invited on this draft EIS. The final EIS and the new rule are expected late 2026. The deadline for submitting a comment is September 19.

The best tactic for opponents of this action is to have a large expression of public support for the rule to show Congress the need for permanent legislative protection for all roadless areas. Here is the address to post comments: <https://www.federalregister.gov/documents/2025/08/29/2025-16581/special-areas-roadless-area-conservation-national-forest-system-lands#open-comment> You can mail in your comments if you prefer, but they must be received by September 19. The mailing address for that can be found in the NOI announcement.

To get the word out, please forward this Alert to everyone you know who might want to protect the forests.

You can write your own thoughts, or you can use something like this:

I am writing to state strong opposition to the Notice of Intent rescinding the Roadless Area Conservation Rule (2025-16581 (90 FR 42179)). The Roadless Rule has been a successful and important part of protecting America and America's forests. The announcement of the rule change gave three reasons for changing the Roadless Rule: improving forest management for better wildfire prevention, removing limitations on road construction and to help economic development. The Federal Register notice gives a different and less precise justification. It only discusses an alleged need for deregulation to free up local Forest Service regions to examine how the former protected areas might be managed to do such things as improve conservation, change forest management in the roadless areas, including increased harvesting, improve wildfire management, and to build more roads.

The NOI relies on misinformation and mistaken assumptions. Scientific studies of the western forests have shown that any type of increased forest management also increased the frequency and severity of fires. <https://esajournals.onlinelibrary.wiley.com/doi/pdf/10.1002/ecs2.1492> The announcement justifies action based on an argument that roadless areas are near urban areas. This is wrong.

The announcement exaggerates the amount of roadless areas near urban areas by a factor of nine. (<https://www.wilderness.org/sites/default/files/media/file/Roadless%20testimony%20on%20WUI%20-%20TWS%202025.pdf> ) Forest fires away from the rural-urban interface (away from existing roads) are good for the forests, and studies show that there has been no increase in fire severity from 1984 to 2012. Many studies, including one by The Wilderness Society, have shown that wildfires are twice as likely to start next to a road. Ending the roadless rule and building new roads will mean more wildfires.

Creating new roads to allow more logging is very expensive. The Forest Service traditionally loses money with each new logging project in roadless areas. In times of budget cuts and pushes to increase governmental efficiency, it makes no sense to change a Rule that is actually saving federal funds.

The Forest Service has recently seen major cuts in personnel at all levels and a major reorganization has been announced. The NOI does not address these changes, nor does it consider how these major changes might affect the ability of the remaining local staff to take on the tasks of considering how to implement new directives. Despite what it says, this NOI seems to be substituting a new set of national, one size fits all directions, supported only by misinformation for an established, well-functioning rule based on careful management principles.

For these reasons, and for the health of America's forests and America's citizens, ending the Roadless Rule is just wrong.

