



August 24, 2026

There are more than 44 million acres that are classified by the Forest Service as roadless areas (originally there were 60 million acres). These are areas outside wilderness areas that have been protected from roads, and thus from logging or mineral development. There are over a hundred thousand acres of roadless areas within the proposed Douglas-Fir National Monument, many recognized, many not officially recognized. The proposal to rescind the roadless areas of the proposed Monument would threaten most, if not all, of the old-growth stands of the proposed Monument. When combined with the Trump Administration's changes to the Endangered Species Act, virtually all of the proposed Monument, nearly all National Forest land in Alaska and the lower 48 states, would be eligible for logging and mining development.

When the Trump Administration started the process more than a year ago, they gave all sorts of reasons for the need to open roadless areas, perhaps especially because of a need to deal with wildfires. These rationales have nearly disappeared. The main idea now is that it is necessary to rescind the Roadless Rule in order to increase local control and get away from a 'one size fits all' national approach. In a contradictory approach, the Forest Service also says that they must rescind the Rule so as to better implement President Trump's Executive Orders, especially the one saying the U.S. needs to produce more lumber.

In the announcement made on August 20, there are two related actions. First, the Department of Agriculture, Forest Service is rescinding the Roadless Rule (you can read this recission at <https://public-inspection.federalregister.gov/2026-16965.pdf>). Second, the Forest Service put out a draft environmental impact statement justifying the rule change. To keep things somewhat short, I will discuss them both and treat them as a unit. If there is a legal challenge, it will most likely start with the draft environmental assessment, especially since the Trump Administration is treating all the comments as a unit.

The draft environmental impact analysis <https://usfs-public.app.box.com/s/gomzq6rruwsds8rw50o3j3g429utj8f6/folder/410240355735> justifies rescinding the roadless rule by saying that the overall purpose is to relieve everyone of a regulatory burden and return control over management of the Forest to local Forest Service offices. The idea is that the Roadless Rules regulation has inhibited local offices from managing the forest, and addressing alleged problems in the Forest. The Administration wants to allow the local Forest Service to address "needs or opportunities to address overgrown and fuel-loaded national forests." This is a euphemism for more logging.

The Administration says that, especially in the western U.S., where most roadless areas are concentrated, conditions since the 2001 initiation of the Roadless Rules have changed, specifically mentioning: "increasing drought, extreme temperatures, wildfire frequency and severity, and insect and disease outbreaks." The Forest Service has also allegedly changed its decision making, becoming "more adaptive, science-based, efficient, and effective" which also justify the recission.

As is standard in an Environmental impact analysis, the Forest Service proposes three alternatives. The first is to make no changes to the Roadless Rules. The second is to rescind the Roadless Rule. The third alternative is to partially rescind the roadless rule, opening 31 million acres of the current 44 million acres.

Of all the alternatives in the EIS, the only acceptable alternative (to the Friends) is the first one, the no action alternative, which would mean that the Roadless Rule is not rescinded. Of course, since they announced at the start that they were going to rescind the Rule, this alternative is rejected by the Trump Administration.

I mention these arguments because we must oppose the rescission and the draft environmental assessment. The Friends of Douglas-Fir National Monument have been participating in a national coalition of environmental, recreational, and other public interest groups observing the process and organizing the resistance to the rescission of the Rule. When the Roadless Rule was originally proposed, in 2001, there were more than 1.6 million comments, 90 percent of which were positive. Last year, when the Trump Administration announced its plan to rescind the Roadless Rule there were over 600,000 objections. We in the association are hoping that we can get over a million objections, so that we can at least equal the level of 2001 support for the Roadless Rule. So you, our friends, don't have to do it all by yourselves, but each of us really need to help out. You can make a comment directly to the Forest Service by going to <https://www.regulations.gov/commenton/FS-2025-0001-223869> Or, you can go to one of the environmental group's portals that are available. One that the coalition has developed is <https://saveroadlessforests.com/> .

Some members of Congress have started legislation that would put the Roadless Rule into law. Some Members, including Val Hoyle, have posted criticisms of the proposed rescission. Sending them a message of thanks and informing them about your opposition will also help bolster the resistance.

Write your own letter, just sign a note in the group portal, or copy and paste the letter below to the official comment link <https://www.regulations.gov/commenton/FS-2025-0001-223869> . But please get involved and add your name to the list of objectors. Numbers of opponents are the only hope of having some impact.

Responses are due by September 21. You can and should get them in as early as possible. This is the objection I and the Friends will be sending.

Milo Mecham, President

To: USDA Secretary Brooke Rollins

Re: Project #68605, docket number FS-2025-0001

I am writing to strongly oppose the proposed rescission of the Roadless Rule and to demand that the flawed draft environmental impact analysis be changed to select the no action alternative.

The analysis attempting to justify the rescission of the Roadless Rule is flawed and contradictory. The analysis states that the Forest Service has become more science based, yet the analysis ignores the vast weight of scientific evidence.

The analysis ignores what science has shown is the greatest threat to our forests; climate change. The scientific evidence shows that road building and logging contribute far more greenhouse gasses than do wildfires in the forests. The analysis ignores scientific analysis that shows that the vast majority of fires threatening our forests start within 50 meters of roads in the Forest. Building more roads will mean more fires. Data, including Forest Service data, shows that more than 84 percent of all fires are started by humans. Similarly, scientific studies show that the more treatment imposed on our Forests, the more danger there is of fires. Science shows that there is no such thing as overgrown and fuel-loaded forests. Instead these forests are a part of the natural cycle that has established and maintained forests for thousands of years. Finally, scientific studies show that the most effective and economical way to deal with fires in the Urban Wildlands Interface is to harden the buildings within the Interface, not trying to deal with the mythical concept of fuel loading.

The best way, the scientifically based way, to address drought, extreme temperatures, wildfire frequency and severity and insect and disease outbreaks is not to increase roads, which science has shown disproportionately increases climate changing gasses and fires. The most effective and efficient way to address these problems is to directly address climate change and reckless intrusions into the urban wildlands interface.

The original Roadless Rule was created because the Forest Service could not support the cost of maintaining existing roads. You have cut the budget of the Forest Service, closed regional offices and cut Forest Service personnel, yet you are proposing to force more roads and more costs on the shrunken Forest Service.

The study announces that the Rule is being rescinded to return control to local decision making rather than continuing with an established national Rule, while at the same time the analysis includes imposing President Trump's Executive Orders on the decision making process. The analysis gives lip service to multiple use, but ignores the negative impact of other uses on the acknowledged consequence of rescinding the roadless rule, which will be more logging in the Forests. If you really wanted to allow a local approach to the Roadless Rule, you would properly fund the local Forest Service offices so they could apply contemporary scientific knowledge to actual conditions in the local Forests.

The Roadless Rule should not be rescinded. Instead the draft EIS should be amended to select Alternative One (the no action alternative) and the Roadless Rule should be left in place.

A brief listing of some scientific studies concerning forests referred to in this comment:

Balch, et al. PNAS 2017 <https://doi.org/10.1073/pnas.1617394114> Human-started wildfires accounted for 84% of all wildfires, tripled the length of the fire season, dominated an area seven times greater than that affected by lightning fires, and were responsible for nearly half of all area burned. Also Morrison, P.H. 2007. Roads and Wildfires. Pacific Biodiversity Institute, Winthrop, Washington. https://www.pacificbio.org/publications/wildfire_studies/Roads_And_Wildfires_2007.pdf Forest Service data <https://www.fs.usda.gov/rds/archive/catalog/RDS-2013-0009.7>

Bradley, et., al. <https://esajournals.onlinelibrary.wiley.com/doi/pdf/10.1002/ecs2.1492> Ecosphere 7(10):e01492. 10.1002/ecs2.1492 Increased treatment in forests means more fires.

The most long-unburned forests experienced mostly low/moderate-severity fire (Odion et al. 2004, *Conservation Biology* 18:927–936) Odion and Hanson 2006 (*Ecosystems* 9:1177–1189), Miller et al. 2012 (*Fire Ecology* 8:41–57), van Wagtendonk et al. 2012 (*Fire Ecology* 8: 11–32)

Using the MTBS (www.mtbs.gov) data set, Picotte et al. (“1984–2010 trends in burn severity and area for the conterminous US.” *International Journal of Wildland Fire* 25:413–420, 2016) found that most vegetation groups in the conterminous United States exhibited no detectable change in area burned or fire severity from 1984 to 2010.

<https://static1.squarespace.com/static/59c554e0f09ca40655ea6eb0/t/59dd4984a8b2b090a38f07a1/1507674513035/2017-OGWC-Legislative-Report.pdf> Logging in forests far outproduces atmospheric carbon dioxide, when compared to fires.

Calkin, D.E., Barrett, K., Cohen, J.D., Finney, M.A., Pyne, S.J., and Quarles, S.L. (co-authored by U.S. Forest Service). 2023 <https://eco-integrityalliance.org/wp-content/uploads/2024/10/jmp-fact-sheet-thinning-and-fire-23sept24.pdf> A large body of scientific evidence and opinion, including from a growing group of U.S. Forest Service scientists, concludes that thinning—including thinning-plus-burning—and post-fire logging/clearcutting increase overall tree mortality and carbon emissions, make wildfires spread faster and/or burn more severely, and our current funding and management focus on tree cutting and removal in wildland forests is putting nearby communities at greater risk.

