Rachel Carson Council Comment: USDA Proposed Rescission of the Roadless Rule
(Docket No: FS-2025-0001)

The Rachel Carson Council (RCC), a national environmental organization founded in 1965 to continue Rachel Carson's legacy, submits this comment in strong opposition to the U.S. Department of Agriculture's (USDA) proposed rescission of the 2001 Roadless Area Conservation Rule ("Roadless Rule").

For a quarter of a century, the Roadless Rule has been a cornerstone of American conservation, safeguarding over 58 million acres of our nation's most natural and pristine forests.[i] These areas preserve critical habitat for hundreds of wildlife species, protect drinking water for over 60 million Americans,[ii] and strengthen communities through recreation and climate resilience. The USDA's proposal to rescind this rule is scientifically unsound, legally unjustified, and ethically indefensible.

Ecological and Climate Consequences:

Rachel Carson's insight that "in nature nothing exists alone" is directly relevant here.[iii] Roads do not exist in isolation; they fragment ecosystems, introduce invasive species, degrade streams, and open forests to destructive logging and resource extraction.[iv] By contrast, large roadless areas provide essential habitat for many species, including hundreds of threatened, endangered, and sensitive plants and animals.[v] But research is clear: once roadless areas are opened, their ecological integrity can never be fully restored.

At this moment, the stakes could not be higher. Scientists warn of accelerating biodiversity loss amounting to a sixth mass extinction.[vi] While at the same time, intact forests represent one of the nation's most effective climate solutions, sequestering vast amounts of carbon, while buffering communities from droughts, floods, and wildfire.[vii] Opening protected areas to logging and road-building would not only destroy habitat but also release millions of tons of stored carbon. Protecting these lands is both an environmental imperative and a matter of climate adaptation and public safety.

Environmental Justice and Vulnerable Communities:

The proposed rescission would also do long-lasting damage to our public lands and the vulnerable populations that depend on them. This is particularly true for rural communities and indigenous nations that rely on intact forests for clean water, subsistence, and cultural survival. Stripping protections in favor of industrial logging interests would deepen existing inequities, erode trust responsibilities, and undermine tribal sovereignty.

Legal and Public Support:

The USDA's proposed rescission is not only unwise, but it is also unlawful and unpopular. Courts have repeatedly upheld the Roadless Rule against challenge, affirming that it is consistent with the National Forest Management Act (NFMA) and the National Environmental Policy Act (NEPA).[viii] Moreover, since its inception, the roadless rule has had massive, bipartisan public support. Over 1.6 million comments were submitted in favor of the Roadless Rule – more than any other rulemaking in our nation's history at the time it was adopted. In the intervening years, support for the rule has only grown.

Americans now overwhelmingly support the Roadless Rule, in part because it protects the ecological and recreational values of our national forests. Millions of Americans visit protected areas each year to hike, camp, fish, and enjoy unspoiled nature. Roadless areas include large sections of some of our most iconic national trail systems, such as the Appalachian, the Continental Divide, and the Pacific Crest Trails. Rescinding the Roadless Rule would open these and other pristine lands to development, degrading the beauty and solitude people seek. Protecting roadless areas is both an environmental necessity and a reflection of the public's clear demand to preserve America's last wild places.

Conclusion:

For nearly six decades, the Rachel Carson Council has worked to advance a vision of harmony between people and the natural world. Repealing the Roadless Rule would betray that vision, leaving future generations with degraded forests, polluted waters, and fewer tools to confront the climate crisis. We therefore call on the USDA to abandon this misguided proposal and reaffirm its duty to protect the last great roadless areas of our nation.

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[i] U.S. FOREST SERVICE, *Roadless Area Conservation Rule Final Environmental Impact Statement* vol. 1, at 1-5 (Nov. 2000), https://www.fs.usda.gov/sites/default/files/roadless/roadless-feis-volume1.pdf.

[ii] *Id.* at 3-266 (noting over 60 million Americans rely on national forest watersheds for drinking water).

[iii] CARSON, R., SILENT SPRING, 51 (Houghton Mifflin 1962).

[iv] Trombulak, S. C. & Frissell, C. A., *Review of Ecological Effects of Roads on Terrestrial and Aquatic Communities*, 14 CONSERVATION BIOLOGY 18 (2000), *available at* https://doi.org/10.1046/j.1523-1739.2000.99084.x.

[v] Special Areas; Roadless Area Conservation, 66 Fed. Reg. 3244, 3253 (Jan. 12, 2001) (noting that more than 65% of all Forest Service sensitive species are directly or indirectly affected by inventoried roadless areas), https://www.govinfo.gov/content/pkg/FR-2001-01-12/pdf/01-726.pdf

[vi] Gerardo Ceballos et al., Biological Annihilation via the Ongoing Sixth Mass Extinction, 114 PROC. NAT'L ACAD. SCI. E6089 (2017), https://doi.org/10.1073/pnas.1704949114.

[vii] William R. Moomaw et al., Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good, 2 FRONT. FOR. & GLOB. CHANGE 27 (2019), https://doi.org/10.3389/ffgc.2019.00027

[viii] See, e.g., Wyoming v. U.S. Dep't of Agric., 661 F.3d 1209 (10th Cir. 2011), available at https://law.justia.com/cases/federal/appellate-courts/ca10/09-8075/09-8075-2011-10-21.html.