

Comments on the proposal to rescind the 2001 Roadless Area Conservation Rule
Docket number FS-2025-0001

September 9, 2025

These comments are submitted on behalf of the Rogue Valley Audubon Society (RVAS), a chapter of the National Audubon Society with over 500 members in southern Oregon. We are strongly opposed to the rollback of the Roadless Area Conservation Rule. This rule protects more than 60 million acres that provide irreplaceable benefits for all Americans: clean, cold drinking water, unmatched wild recreation opportunities, habitat for salmon and wildlife, and wide expanses of intact, fire-resistant ancient forests.

Here in southern Oregon, we are fortunate to have many nearby areas protected by the Roadless Rule, including the McDonald Peak, Kinney, and Kangaroo Inventoried Roadless Areas. Our RVAS members frequently hike, birdwatch, and seek peace and solitude in these beautiful forests, and the McDonald Peak IRA protects the headwaters of Ashland Creek, which is the water source for the city of Ashland. Our water quality and quantity would be severely affected by road-building and logging in the McDonald Peak roadless area.

On a nationwide basis, there are many reasons to reject any change in the Roadless Rule. The US Forest Service is already unable to maintain the huge network of roads for which it is responsible; more than twice the road miles (368,000 miles) than the Federal Highway Administration (160,000 miles). The US Forest Service has a maintenance backlog of \$5.9 billion on this existing road network. At a time when this administration is cutting back on agency budgets, including the US Forest Service, it is irresponsible to add more maintenance and upkeep expenses for a road system that seems destined to fail given extreme weather events like wildfire and floods.

A main reason cited to justify revoking the Roadless Rule is to reduce the threat of wildfires. This is entirely false. Research and analysis over the years have actually shown that forested areas with heavier road densities will see more wildfire activity than un-roaded/undeveloped areas. Humans are the leading cause of wildfire, with nearly 85% of fire starts being human-caused. Further, intact old-growth forests – precisely those protected by the Roadless Rule – have been shown to be the most fire-resistant. Opening these forests to logging will increase wildfire severity and contribute to wildfire spread.

Our members strongly believe that unroaded and unlogged forests have irreplaceable intrinsic value – as wildlife habitat, as examples of intact natural ecosystems, and as refugia in this time of rapid environmental change. But their value for local economies is equally vital. Outdoor recreation has become an important economic driver for many Western communities. According to the Outdoor Alliance, Roadless Areas across the country are home to 800 miles of whitewater paddling and 8,000 different climbing routes. There are more than 45,000 miles of hiking and mountain biking trails, in addition to innumerable prime areas for hunting and fishing. All this would be threatened by logging and road-building.

The Roadless Rule has been a farsighted and highly successful policy. It was adopted with tremendous public support, which continues today. To roll it back would be a tragic mistake.

Respectfully submitted,

Rogue Valley Audubon Society
Medford, Oregon