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To: Brooke Rollins, Secretary, U.S. Department of Agriculture
Tom Schultz, Chief, U.S. Department of Agriculture Forest Service

From: Woodwell Climate Research Center

Date: September 17, 2025

Re: Docket Number FS-2025-00012001: 2001 Roadless Area Conservation Rule

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Thank you for the opportunity to comment on proposed rulemaking to rescind the 2001 Roadless Area Conservation Rule (Roadless Rule) (Docket Number FS-2025-00012001). Scientists from Woodwell Climate Research Center (Woodwell) respectfully submit the following comments. We emphasize the many values of forests that have been protected from commercial logging since 2001 by the Roadless Rule, such as climate mitigation, wildlife habitat, water, and recreation. We strongly emphasize that the upcoming Environmental Impact Statement (EIS) must address the following questions using the best available science:

- What are the environmental impacts of increasing road density, including increased risk of fire ignitions?
- What types of logging will occur and what specific areas will be logged?
- Do the U.S. Forest Service and Bureau of Land Management (BLM) have capacity to manage increasing timber sales in remote areas? If not, how will loggers be directed and monitored?
- What are the net carbon dioxide emissions from increased logging of mature and old-growth forests?
- Will all projects require National Environmental Policy Act (NEPA) review, including analysis of effects on individual species as defined by the Endangered Species Act?
- Will the transition to local decision-making without national guidelines facilitate unacceptable degradation of mature and old-growth forests?

The EIS should be comprehensive and based on the best available science. The Roadless Rule currently protects millions of acres from extractive activities that would result in ecosystem degradation and increased vulnerability to wildfire. Rescinding the Roadless Rule would harm many public uses of the land, cause significant emissions of greenhouse gases, and destroy critical habitat for many species of wildlife. Assessment of these impacts must be clearly articulated so that the public interests can be protected from consequences that would arise from increasing logging and other extractive industries. Our analysis indicates that if the environmental impacts are fairly and comprehensively assessed, the Roadless Rule would continue to protect millions of acres from degradation long into the future.

Background

The “Inventoried Roadless Rule” has been a resounding success over several decades, protecting some of the most critical federal forest resources from land management activities that typically destroy or degrade healthy and productive ecosystems. The Roadless Rule has protected about 50 million acres of forest from commercial logging, allowing the land to support other uses such as wildlife habitat,

recreation, and watershed protection as part of a landscape connecting protected wilderness areas with multiple use areas. A key element of this protection involves retaining large trees that are naturally resistant to wildfire damage and contain large quantities of carbon in their biomass and soils. According to recent studies, Inventoried Roadless Areas of the conterminous U.S. (excluding Alaska) contain 33.6 million acres of mature and old-growth forest, with a carbon stock of 2.0 billion metric tons (Birdsey et al. 2025).

The President's proposed 25% (or larger) increase in logging from federal lands would likely come largely from Roadless Areas because of the high economic value of the large trees and mature forests. Of particular concern is the large Roadless Area of the Tongass National Forest in Alaska which includes 16.6 million acres of forest, most of which is mature or old growth. Tongass contains almost as much carbon stock as the entire rest of the National Forest system -- 2.7 billion tons – making it the most important and largest undisturbed forest in the U.S. (DellaSala et al. 2022).

Several reasons are stated for building new roads in roadless areas. An overarching rationale is to abolish national guidance for management decisions that are considered overly strict and allow management decisions to occur at the local level. The Notice of Intent also highlights that better access via roads facilitates controlling wildfires; improving resilience to degradation from natural disturbances; and making logging and mining the priority use of these lands. However, as we note below, scientific literature regarding environmental impacts does not support the proposed change in policy to allow more access and logging of relatively undisturbed and remote forest areas, and national guidelines are critical for implementing policies that are in the public interest.

Six Key Questions and Recommendations

1. What are the environmental impacts of increasing road density, including increased risk of fire ignitions?

Studies have shown that areas with road access have more wildfires than more remote areas (Downing et al. 2022). The reason is that wildfires are most often caused by humans and ignitions are facilitated by better access. Also important is that mature and old-growth forest ecosystems are more resilient to wildfires compared with more actively managed (i.e. logged) forest lands (Levine et al. 2025; Lesmeister et al. 2021). Thus, when fires do occur, they tend to be of lower severity because larger trees are more resistant to damage from fire. It is also argued that active management increases resilience, which may be true in some cases, but not as a general recommendation (DellaSala et al. 2020; Law et al. 2018).

Recommendation: We recommend that new roads NOT be established in currently roadless areas, and that any increase in timber harvesting from federal forests be conducted within existing multiple use areas that currently allow logging following guidelines established in previously approved forest plans.

2. What types of logging will occur and what specific areas will be logged?

The intensity of logging makes a big difference in the impacts. For example, a clearcut may release more than half of the ecosystem carbon, whereas a partial harvest such as a thinning may have much less impact (Cook-Patton et al. 2021; Nunery and Keeton 2010; Russell et al. 2025). Furthermore, logging larger trees that are more resistant to wildfire damage and leaving smaller trees standing among the logging debris raises the risk of future wildfire because of the presence of fuel on or near the ground (Hackkenberg et al. 2024).

We recommend that the EIS require that each project include clear guidelines and guardrails to avoid excessive logging and degradation of forests particularly in Inventoried Roadless Areas that contain mature and old-growth forests that have higher value to society than to specific industrial entities.

3. Do local U.S. Forest Service and BLM offices have capacity to manage increasing timber sales in remote areas? If not, how will loggers be directed and monitored?

Because of recent federal staffing cuts, it is doubtful that the U.S. Forest Service and BLM will be able to effectively prepare timber sales and monitor the project implementation. Although most loggers are responsible, it is likely that project boundaries will not be adhered to in all cases. Lacking direction or oversight, it will be tempting for loggers to harvest trees outside of the project boundaries and/or select larger trees to harvest that should be left standing to provide important ecosystem functions such as wildlife habitat, resistance to wildfire, and carbon storage.

Recommendation: We recommend that timber targets take account of the federal capacity to effectively plan and review all projects, rather than simply following timber targets established arbitrarily such as increasing harvest everywhere by a fixed amount.

4. What are the net CO_2 emissions from logging mature and old-growth forests?

Federal forests hold immense carbon storage and climate mitigation potential. They absorb the equivalent of roughly 3% of U.S. emissions from fossil fuel burning each year, with mature and old growth forests responsible for the majority of that (Birdsey et al. 2023, 2025). Increased logging is the single greatest threat to these forests and the carbon they hold -- and it is the threat we most directly control. As the impacts of climate change become more extreme and damaging, we should prioritize protecting mature and old growth forests on federal lands, not harvesting them.

Most peer-reviewed studies conclude that it is more effective to let forests grow without management interventions or harvesting to address the principal cause of climate change, emissions of CO_2. (Birdsey et al. 2023, Cook-Patton et al. 2021, Law et al. 2018, Moomaw et al. 2019). These studies indicate that it would take decades to centuries to restore the carbon stocks lost to harvesting live trees – particularly large trees -- even if fully accounting for the temporary storage of carbon in harvested wood products, which is far less than the emissions. Although threats from wildfire and insects must be considered, especially in ecosystems that have short disturbance return intervals, the probability of natural disturbance in areas with high annual rainfall and high productivity is extremely low and therefore not a significant factor in the ability to protect future carbon stocks.

Recommendation: We strongly recommend that forest plans and projects be required to assess the impacts of decisions on carbon stocks and emissions. Even though individual projects may not have discernable impacts on climate, collectively their impact is significant.

5. Will all projects require NEPA review, including analysis of effects on individual species as defined by the Endangered Species Act?

The National Environmental Protection Act (NEPA) and Endangered Species Act ensure that land management projects do not cause unintended, unnecessary, or damaging impacts on ecosystem that are valued for non-timber services like wildlife habitat or water quality. There is a significant likelihood

that to limit public input and speed project implementation, NEPA reviews will be bypassed or excluded. NEPA review has been a highly effective way for facilitating public input as well as adhering to federal regulations regarding environmental impacts.

Recommendation: It is imperative that the EIS include a strong recommendation to continue NEPA reviews for all projects without exceptions.

6. **Will the transition to local decision-making without national guidelines facilitate unacceptable degradation of mature and old-growth forests?**

Because of the national significance of local decisions about land use and management, which have impacts far beyond project boundaries, it is imperative to have clear and consistent national guidelines that are followed when planning logging or other extractive activities on forest lands. This does not mean that some flexibility cannot be allowed to consider local conditions.

Recommendation: There should be some guardrails in place to allow consideration of the impacts of projects and the aggregate of projects on the larger regional and national domains. An example of guardrails that could be established can be found here.

Conclusion

The EIS should be comprehensive and based on the best available science. It is also important to consider the overwhelming interests of the public at large and not just the economic interests of forest industry. The Roadless Rule currently protects millions of acres from extractive activities that would result in ecosystem degradation and increased vulnerability to wildfire. Rescinding the Rule would harm many public uses of the land, cause significant emissions of greenhouse gases, and destroy critical habitat for many species of wildlife. Assessment of these impacts must be clearly articulated so that the public interests can be protected from consequences that would arise from increasing logging and other extractive industries.

About Woodwell Climate Research Center

Woodwell Climate Research Center (Woodwell) is a scientific research organization that works with a worldwide network of partners to understand and combat climate change. We bring together hands-on research experience, and 40 years of policy impact to find societal-scale solutions that can be put into immediate action by policymakers and decision makers. Scientists from Woodwell work in more than 20 countries on six continents, collaborating with a wide range of partners, including national subnational and local governments, nonprofit organizations, universities, and private sector companies. Throughout Woodwell's history, our scientists have been among the world's leaders in studying natural climate solutions and the role of forests in maintaining a stable climate.

Thank you for your consideration of these comments. Please contact Laura Uttley, Director of Government Relations, at luttley@woodwellclimate.org, if Woodwell can provide additional information or resources.

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