



Docket: FS-2025-0001

RIN: 0596-AD66

Document: Special Areas; Roadless Area Conservation

Deadline: October 6, 2026

Secretary Brooke L. Rollins
U.S. Department of Agriculture
Attn: Director, Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

Re: Comments on the Proposed Rule and Draft Environmental Impact Statement, Special Areas;
Roadless Area Conservation (RIN 0596-AD66)

Dear Secretary Rollins:

The National Wild Turkey Federation (NWTF) submits these comments as the Forest Service's longest-standing national habitat partner and as an organization dedicated to the conservation of the wild turkey and the preservation of our hunting heritage.

Since 1973, the NWTF has worked with USDA and the Forest Service to restore habitat, reduce hazardous fuels, keep public hunting opportunities open, and deliver active forest management under Good Neighbor and stewardship authorities. We support the North American Model of Wildlife Conservation.

We also support this Administration's goal of cutting unnecessary bureaucracy and returning decisions to the people who know the ground. A national rule that treats every inventoried roadless area the same does not match the condition of every forest. Idaho and Colorado already showed that tailored, place-based roadless direction can work. Forest supervisors, Tribes, States and local communities should have more room to match treatments to local risk. Rescinding a nationwide prohibition can serve that purpose if the Department is clear about what comes next.

What should not come next is a new permanent road network on land the agency cannot afford to maintain, or a process that treats repeal itself as acres treated.

What the proposal actually does

The proposed rule would remove 36 CFR part 294, Subpart B. It would not authorize any road, timber sale or motorized route. Existing forest plans, the National Forest Management Act, NEPA, the Endangered Species Act, travel-management regulations and other statutes would

still apply. Idaho's and Colorado's state-specific rules would remain. We agree with the Department that this is a planning and implementation question, not a mandate to build.

That distinction should be stated in the final rule and the record of decision as plainly as it is stated in the proposal. Line officers, partners and the public need to hear it from the Department, not only from commenters.

Where the 2001 rule already allows the work

The original rule was written to protect large, relatively undisturbed landscapes from the activities most likely to change their character: new road construction, reconstruction and most timber harvest. It did not close existing roads. It did not ban hunting, fishing, grazing, existing mineral leases or motorized use on routes already designated. It already allowed wildfire suppression, emergency roads, hazardous-fuels reduction, habitat improvement and limited small-diameter harvest for restoration and wildlife.

If the original expectations have not been successfully implemented, it is our recommendation to further clarify the rules, add staffing and funding rather than replace the 2001 rule.

Concerns the Department should address before a final rule

1. *Habitat security and hunting quality.* Inventoried roadless areas still provide unfragmented cover that wild turkeys, elk, mule deer and other wildlife use. New permanent roads change animal distribution, increase disturbance and can convert a walk-in hunt into a roadside hunt. That is a hunting-heritage issue, not only a wilderness issue. Any implementation direction should require a wildlife-security and hunter-opportunity analysis before a new permanent road is added in a former inventoried roadless area.
2. *Water.* Headwaters and municipal watersheds were a core reason the 2001 rule was written. Roads remain one of the primary human sources of soil and water disturbance in forested country. Implementation should keep watershed protection in front of road location, design and drainage, including culvert work that restores passage rather than merely opening a grade.
3. *Fire.* We support more hazardous-fuels work, prescribed fire and strategic access for suppression. More roads do not automatically mean less fire as ignition density is often highest near roads. Treatments reduce risk. Unplanned access can add starts. The final EIS should separate those two effects and direct managers to design access that serves suppression and fuels work without creating a new ignition grid.
4. *The existing road system.* According to the [Forest Service website](#), The Forest Service carries a multi-billion-dollar deferred-maintenance backlog on roads, bridges and related infrastructure. New permanent miles compete with that backlog. The Department should state that first priority is maintaining, repairing and strategically

improving the existing transportation system, including culverts and failed segments that currently block stewardship and emergency response.

5. *Capacity.* The binding constraints are budget, workforce capacity in the right areas, layout, engineering and contractors, not the text of Subpart B or Repeal alone. The Department should pair any final rule with a clear statement that success will be measured in acres treated, watersheds improved and communities protected, not in miles added.
6. *Process.* A 30-day comment period on a nationwide rule and draft EIS is thin compared with the original roadless process. Forest-level decisions that follow should not repeat that mistake. Public involvement at the forest and project scale is how local knowledge gets into the file and how trust is kept. Our recommendation is to provide ample time for the agency level and public involvement in any forest plan revision and that results in rescission of any inventoried roadless area.

How to honor both local control and the resource

If the Department finalizes a rescission the final rule should include the following:

- *Return decisions to the forest plan.* Do not create a second national prescription in the opposite direction. Where a current plan already allows a road or a treatment, use the existing plan, site-specific analysis and the objection process. Where a plan does not allow the activity, amend or revise the plan in the open rather than implying that repeal quietly rewrote the plan.
- *Prioritize temporary and administrative access over new permanent public roads.* Short-term laterals for fuels, habitat, salvage and stewardship should be designed to standard, used for the job and closed or decommissioned when the work is done. Permanent additions to the National Forest System transportation system should be the exception and should be tied to a demonstrated need the existing system cannot meet.
- *Keep travel management on its own track.* Building a road for a project is not the same as designating it for public motor-vehicle use. Motor Vehicle Use Maps and 36 CFR part 212 should continue to control public use. Unlimited off-road access is not active management and is not consistent with wildlife security or with most forest plans.
- *Use the authorities already on the books.* Stewardship contracting, Good Neighbor Authority, the Healthy Forests Restoration Act, existing categorical exclusions for limited fuels and habitat work, and the 2001 exceptions themselves are faster paths to acres treated than a new arterial road. The Department should instruct units to exhaust those tools before proposing new permanent construction in former inventoried roadless areas.

- *Protect values at risk in listed-species country.* Road density is already a factor in grizzly conservation and in anadromous-fish recovery. Increasing density in those landscapes can make recovery and delisting harder. That outcome would add litigation and consultation load, which is the opposite of reducing red tape.
- *Fund maintenance and treatments in the same breath as flexibility.* Flexibility without money produces plans, not habitat. We will continue to bring partnership capacity to stewardship, non-commercial timber removal and habitat delivery. We cannot substitute for a transportation budget.

What NWTF can do

We are prepared to keep doing the work this debate is about. That means marking and implementing stewardship units, removing non-commercial volume that improves habitat, repairing access that already exists, treating fuels in the wildland-urban interface and helping forests write plan components that allow management without sacrificing secure habitat. We will stay engaged at the national office and at the forest level.

Close

The American people asked for less bureaucracy and more competent management. Those are compatible goals if the Department is precise. Take the one-size-fits-all national prohibition off the books if that is the decision. Then tell managers to treat the right acres, repair the roads they already have, keep new permanent miles rare, analyze wildlife and water before they build, and measure success by forest health, community protection and hunting opportunity, not by a map that suddenly looks more open.

That is local control with standards. It is also the only version of this proposal that serves both halves of our mission.

Respectfully,



Kurt W. Dyroff
Co-CEO
National Wild Turkey Federation