

ROADLESS RULE REPEAL

IMPACTS TO BACK COUNTRY HORSEMEN MEMBERS

For more than 50 years, **Back Country Horsemen have worked alongside federal land-management agencies—primarily the U.S. Forest Service (USFS) and Bureau of Land Management (BLM)—to keep trails open and accessible for the public.** Many of those trails cross or provide access to lands protected by the Roadless Rule.

For Back Country Horsemen, this is not an abstract land-management issue. **Roadless lands are backcountry lands—and backcountry is where we ride, pack, volunteer, maintain trails, hunt, fish, and recreate. Losing roadless protections puts the character and accessibility of these places at risk.**

THE DEIS: LOCAL CONTROL OR FEDERAL DIRECTION?

A major concern with the Draft Environmental Impact Statement (DEIS) is that the proposed repeal is being driven by **Executive Orders directing federal agencies to reduce regulatory protections, increase timber production, and expand development on federal lands.**

Executive Orders establish direction that federal agencies are expected to follow. Yet the DEIS presents **“local control” and “local decision-making”** as central reasons for repealing the Roadless Rule.

That raises a fundamental question:

How much local control is actually possible when national directives are already telling the Forest Service what outcomes it is expected to achieve?

Local Forest Service officials may seek public input and attempt to address local concerns, but they ultimately remain responsible for implementing federal direction. This can leave local managers caught between national mandates and the communities they serve.

Calling this “local control” does not make it local control if the ultimate objectives have already been established at the national level.

THE THREE DEIS ALTERNATIVES:

ALTERNATIVE 1: NO ACTION

Keeps the existing Roadless Rule and its current protections in place. Protects some of the nation's most remote and intact national forest lands. Keeping backcountry in its natural condition.

ALTERNATIVE 2: REPEAL

Repeals the Roadless Rule nationwide and it removes the baseline protections and opens the door to substantially greater road construction, timber harvest, energy development, industrial and other activities, reducing backcountry opportunities and experience.

ALTERNATIVE 3: MODIFIED ROADLESS RULE

During the development of the DEIS, we advocated initially for an Alternative that would protect communities and homes in the Wildland Urban Interface (WUI) but still protect the remaining lands. This is not a compromise; this alternative goes way beyond that and removes protection from about 60% of the lands and is not specific where those lands are. It offers **Inadequate Geographic and Acreage Disclosure**.

- Alternative 3 should be evaluated based on its **actual consequences**, not its label.
- At its core, the proposed action is a **repeal of the Roadless Rule**.
- Alternative 3 would remove existing national roadless protections from vast areas of National Forest System lands.
- The Forest Service should clearly disclose:
 - How many acres would lose existing protections
 - Where those acres are located
 - Which activities would become permissible
 - What protections, if any, would replace the Roadless Rule
- The public should not have to decipher the alternative's label to understand the magnitude of the change.
- The Tongass National Forest deserves particular attention because it contains some of the nation's largest remaining intact temperate rainforest landscapes.
- Removing longstanding roadless protections from the Tongass would represent a profound change in federal land policy.

HOW TO COMMENT

Background for Your Comments

COMMENTS ARE DUE BY SEPTEMBER 21, 2026

To Comment: Click this link: [regulations.gov](https://www.regulations.gov). Click on comment. Enter your comment. Add your email. Click on individual or organization if you are a state. Click on your not a robot. That's it.

The following categories are where you should focus. Comment on some or all. Feel free to add anything else important to you.

Your comments can be short or long. The most important thing is to **state which alternative you support (Alt 1- No Action, Alt 2- Repeal, Alt 3-Modified Roadless Rule) at the beginning** and then explain **why it matters to you personally**. Personal stories and experiences can help demonstrate the real-world value of roadless areas.

Recreation

Describe your personal connection to roadless and backcountry areas. Talk about why you value opportunities for horseback riding, hunting, fishing, hiking, camping, wildlife viewing, or other forms of backcountry recreation. Even if you do not live near a roadless area, explain why it is important to you that these places remain available for quiet, backcountry recreation.

Development and Industrial Activities

Explain why it is important to preserve large, natural landscapes that remain relatively free from roads, development, and industrial activity. Roadless areas are among the last places in the country where people can experience undeveloped landscapes and a sense of solitude.

Water Quality

Many roadless areas contain the headwaters of streams and rivers that provide clean water for fish, wildlife, communities, and downstream users. Explain why protecting these watersheds and maintaining clean water is important to you.

Wildlife

Roadless areas provide large, intact habitats that wildlife needs to survive and thrive. Explain why protecting connected, undeveloped habitat is important for fish and wildlife and for maintaining healthy populations over the long term.

Wildfire

Wildfire is a serious and growing challenge, but climate and weather conditions are major drivers of fire behavior and severity. At the same time, roads can provide pathways for human-caused

ignitions. Research shows that human activity accounts for the vast majority of wildfire starts and that fires are disproportionately likely to begin near roads.

Roads

Roads fragments wildlife habitat. They alter drainage patterns, increase disturbance and can open the door to further development. It requires construction, maintenance and eventually taxpayer dollars to keep it open. The USFS current road maintenance backlog on its 380,000 miles of existing roads is in excess of 10 billion dollars. Does it make sense to build more roads?

Future Generations

Explain why future generations deserve the opportunity to experience wild, natural landscapes. Once roads and development permanently alter these places, it can be difficult—or impossible—to restore what has been lost. Protecting roadless areas helps ensure that future generations can enjoy the same opportunities and landscapes that we value today.

Most importantly, make your comments your own. Explain what these places mean to you and why you believe they should—or should not—remain protected. Personal comments do not have to be lengthy to be effective.

Protect the Roadless Rule. Protect the backcountry. Protect the trails and landscapes that make our mission possible.