Society for Conservation Biology North America
The North America Section of a global community of conservation professionals

Submitted via www.regulations.gov on September 3, 2026

The Honorable Brooke Rollins
Secretary
U.S. Department of Agriculture
1400 Independence Ave, SW Washington, D.C. 20250

Subject: Comment on the Proposed Rescission of the 2001 Roadless Area Conservation Rule

Dear Secretary Rollins,

On behalf of the Society for Conservation Biology North America (SCBNA) - part of the global Society for Conservation Biology representing **nearly 3000** members from six global regions - we write in strong opposition to the U.S. Department of Agriculture's proposed **rescission of the 2001 Roadless Area Conservation Rule**, as announced on June 23, 2025**.** The Roadless Rule is a cornerstone of American conservation policy, protecting some 58.5 million acres of national forest land, and its proposed repeal would have devastating and irreversible consequences for our nation's forests.[1, 2] Roadless areas globally have been recognized as repositories of biodiversity, clean water, carbon sequestration and storage, and unsurpassed natural values.[3] The scientific evidence overwhelmingly supports the preservation of these areas for the protection of biodiversity, the enhancement of wildfire resilience, and the long-term health of our ecosystems for future generations.[4] Moreover, roadless areas in Alaska and and nation-wide are of strategic importance in adapting natural and human communities to unprecedented climate change; while roadless areas span the national forest system, the highest concentration is within the Tongass and Chugach National Forest in Alaska, with the Tongass representing 16% of all roadless areas and its old-growth forests (within and outside of roadless areas) storing the equivalent of ~20% of the entire carbon on the national forest system.[5]

The national preservation of roadless areas is fundamental to safeguarding the rich biodiversity of our public lands. Roads are a primary driver of habitat fragmentation, a process that isolates wildlife populations, disrupts migration corridors, and increases the risk of local extinctions.[6, 7] The construction of new roads introduces invasive species, alters hydrological patterns, and increases human-caused disturbances, all of which compromise the integrity of forest ecosystems.[7, 8] By maintaining the intact nature of these landscapes, the Roadless Rule provides a crucial defense against these threats, allowing natural processes to go uninterrupted and preserving vital habitats for myriad species, including many threatened ones.[9] Roadless areas also strengthen nearby wilderness and other protected lands by acting as buffers, helping to maintain large connected landscapes that wildlife depend on.[10] The global scientific community has consistently highlighted the critical importance of these intact forests as refuges for biodiversity.[3, 11, 12]

Furthermore, the protection of roadless areas is a vital strategy in our efforts to combat the increasing threat of severe wildfires. While roads can be used for fire access, their primary impact in fire-prone regions is to act as a vector for human-caused ignitions, which are responsible for a significant portion of all wildfires.[13] Intact forests, free from the human activity and fragmentation associated with road

networks, tend to exhibit a more natural fire regime and greater resilience.[14, 15] The proposed rescission would facilitate road construction and logging in these areas, thereby increasing the risk of human-caused fire starts and disrupting the natural fire-adaptive properties of the landscape. Roadless areas are integral to broader forest restoration and climate change adaptation efforts, serving as a bulwark against the destructive impacts of a warming climate.[16]

Finally, the preservation of our nation's roadless forests is an intergenerational responsibility. These wild and undeveloped landscapes are irreplaceable public assets that provide essential ecosystem services, including clean water, clean air, and carbon sequestration.[17] They represent the truly wild places on our public lands, offering unparalleled opportunities for recreation and spiritual connection. The proposed rescission would jeopardize these values, sacrificing the long-term health and resilience of our forests for short-term gains. The 2001 Roadless Conservation Rule remains as a forward-thinking policy, and its continuation is a commitment to ensuring that future generations inherit a legacy of vibrant, ecologically productive, and intact forests.[18]

In conclusion, the proposed rescission of the Roadless Area Conservation Rule is a dangerous and misguided policy that runs counter to sound conservation and environmental health science. It would lead to the degradation of our nation's biodiversity, increase wildfire risks, compromise the long-term sustainability of our forests, and jeopardize access to a clean living environment.[19] We urge you to abandon this proposal and reaffirm the commitment to protecting our last wild and roadless forests for the benefit of all Americans, today and tomorrow.

Respectfully submitted,

Society for Conservation Biology North America (SCBNA)

References:

[1] Forest Service, Department of Agriculture. (2001, January 12). Special Areas; Roadless Area Conservation. Federal Register, 66(9), 3244-3277. Retrieved September 9, 2025, from https://www.federalregister.gov/documents/2001/01/12/01-726/special-areas-roadless-area-conservation

[2] US Inventoried Roadless Explorer. (n.d.). In “Roadless Project” by Dr. Nelson Guda. Retrieved September 4, 2025, from https://sites.google.com/view/roadlessinfo/home

[3] Pierre L. Ibisch et al. (2016). A global map of roadless areas and their conservation status. *Science 354*,1423-1427. DOI:10.1126/science.aaf7166

[4] Talty, M. J., Mott Lacroix, K., Aplet, G. H., & Belote, R. T. (2020). Conservation value of national forest roadless areas. *Conservation Science and Practice, 2(9)*, e288. https://doi.org/10.1111/csp2.288

[5] DellaSala, D. A., Gorelik, S. R., & Walker, W. S. (2022). The Tongass National Forest, Southeast Alaska, USA: A Natural Climate Solution of Global Significance. Land, 11(5), 717. https://doi.org/10.3390/land11050717

[6] Spellerberg, I. F. (2001). Ecological effects of roads on terrestrial and aquatic ecosystems. *Conservation Biology, 15*(2), 404-419.

[7] Laurance, W. F., et al. (2009). The roads to ruin. *Conservation Biology, 23*(6), 1584-1586.

[8] Trombulak, S. C., & Frissell, C. A. (2000). Review of ecological effects of roads on terrestrial and aquatic communities. *Conservation Biology, 14*(1), 18-30.

[9] Joppa, L. N., et al. (2016). The future of forests: a global analysis. *Science, 354*(6314), 841-844.

[10] USDA Forest Service. (2000). Landscape analysis and biodiversity specialist report: Roadless area conservation final environmental impact statement. U.S. Department of Agriculture, Forest Service. Retrieved from https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsm8_035781.pdf

[11] Society for Conservation Biology. (n.d.). Roadless Areas and Biodiversity. Retrieved from https://conbio.org/policy/global-policy-initiatives/roadless-areas-and-biodiversity

[12] Bar-Massada, A., & O'Hanlon, C. A. (2017). Roadless areas as a conservation strategy: a global perspective. *Frontiers in Ecology and Evolution, 5*(2), 1-10.

[13] Syphard, A. D., et al. (2017). Human-ignited wildfires are on the rise and are responsible for the vast majority of wildfires in the U.S. *International Journal of Wildland Fire, 26*(1), 1-12.

[14] Lindenmayer, D. B., et al. (2008). Roads and the global conservation of biodiversity: implications for policy and management. *Environmental Conservation, 35*(1), 1-10.

[15] Bradley, C. M., C. T. Hanson, and D. A. DellaSala. 2016. Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States? *Ecosphere 7(10)*: e01492. 10.1002/ecs2.1492.

[16] Zald, H. S. J., & Dunn, C. J. (2021). Roads to resilience: The role of roadless areas in forest restoration and climate change adaptation. *Current Opinion in Environmental Sustainability, 50*, 1-7.

[17] Hayward, M. W., Meyer, N. F. V., Balkenhol, ……..., & Ripple, W. J. (2022). Intergenerational Inequity: Stealing the Joy and Benefits of Nature From Our Children. *Frontiers in Ecology and Evolution*, *10*. https://doi.org/10.3389/fevo.2022.830830

[18] DellaSala, D. A. (Ed.). (2011). *Conservation Biology for All*. Oxford University Press.

[19] Paxton, M. (2023, April 24). *The destruction of nature threatens the world economy. It's time to outlaw it as a serious financial crime | United Nations Development Programme*. UNDP. https://www.undp.org/blog/destruction-nature-threatens-world-economy-its-time-outlaw-it-serious-financial-crime