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Sent to:

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These comments are submitted on behalf of the Flathead-Lolo-Bitterroot Citizen Task Force.

WE ARE STRONGLY OPPOSED TO THE PROPOSED RULE. This proposal checks all the boxes for bad policy. It has no scientific support. It is not economically viable. It does not have the support of the American people. It violates national environmental and wildlife protection laws.

There needs to be a fourth alternative in the DEIS that prohibits any logging and thinning for any reasons. The inventoried roadless areas must be managed to maintain their eligibility for designation as Wilderness, which means no mechanized or motorized uses whatsoever.

The public comment period is grossly insufficient to review, analyze and formulate comment on a 333-page document and must be extended to 120 days, commensurate with the comment period on the original roadless rule proposal.

This is a short-sighted proposal. The reasoning offered for the Proposed Rule is faulty and inaccurate. It is opposed by 99% of the public who have commented in record numbers. It is based on hype, hysteria and phony science. It is undemocratic and ignores the will of the American people.

Courts have upheld the Roadless Rule finding it legal (*Kootenai Tribe of Idaho v. Veneman* 313 F.3d 1094 (9th Cir. 2002); *Wyoming v. U.S. Dept. Agriculture* (10th Cir. 2011). The Supreme Court declined to review the 10th Circuit ruling so it is standing law. The Proposed Rule is not legal and violates several national laws and policies.

Science has shown over and over that roadless areas provide the most secure habitat for fish and wildlife including threatened and endangered species. Bull trout populations are strongest in roadless watersheds (Bader 2000). According to Trout Unlimited (2026) 79% of bull trout spawning and rearing habitat in Oregon is in roadless areas.

Roadless areas are the only areas where salmonid habitat quality improved (Sedell and Everest 1990). Quigley et al. (1996) found that roadless areas are important anchors for remaining strongholds for native fish.

Olden et al. (2026) found IRAs protect over 130,000 kms of streams and rivers and IRA-influenced watersheds provide clean drinking water for at least 25 million Americans.

Roads are leading sources of fine sediment pollution of water bodies and a leading cause of species decline, extirpations, landslides and mass wasting events.

Carroll et al. (2001) found roadless areas provide the most suitable habitat for grizzly bear, lynx, wolverine and fisher. Bader and Sieracki (2022) found grizzly bears selected dens an average of 1.96km from open roads and the majority of dens were in roadless areas. Proctor, et al., (2019) showed that grizzly bear density in roadless or low road density areas was twice that of bears in areas with roads. Proctor et al. (2019) found roadless areas provide the most secure habitat for grizzly bears and support positive population growth rates (Lamb et al. 2019). Walker and Craighead (1997) and Rissien (2026) showed that roadless areas are critical for connectivity habitat for grizzly bears.

Without roadless areas, grizzly bears will go extinct in the lower 48 states. Roadless areas are essential for required connectivity for grizzly bears. With repeal of the roadless rule, grizzly bear delisting from the Endangered Species Act cannot occur as it will represent a major inadequate regulatory mechanism.

Roadless rule repeal will undermine commitments made in National Forest Plans and Conservation Strategies for grizzly bears. Removing these post-delisting commitments will legally prevent grizzly bear delisting.

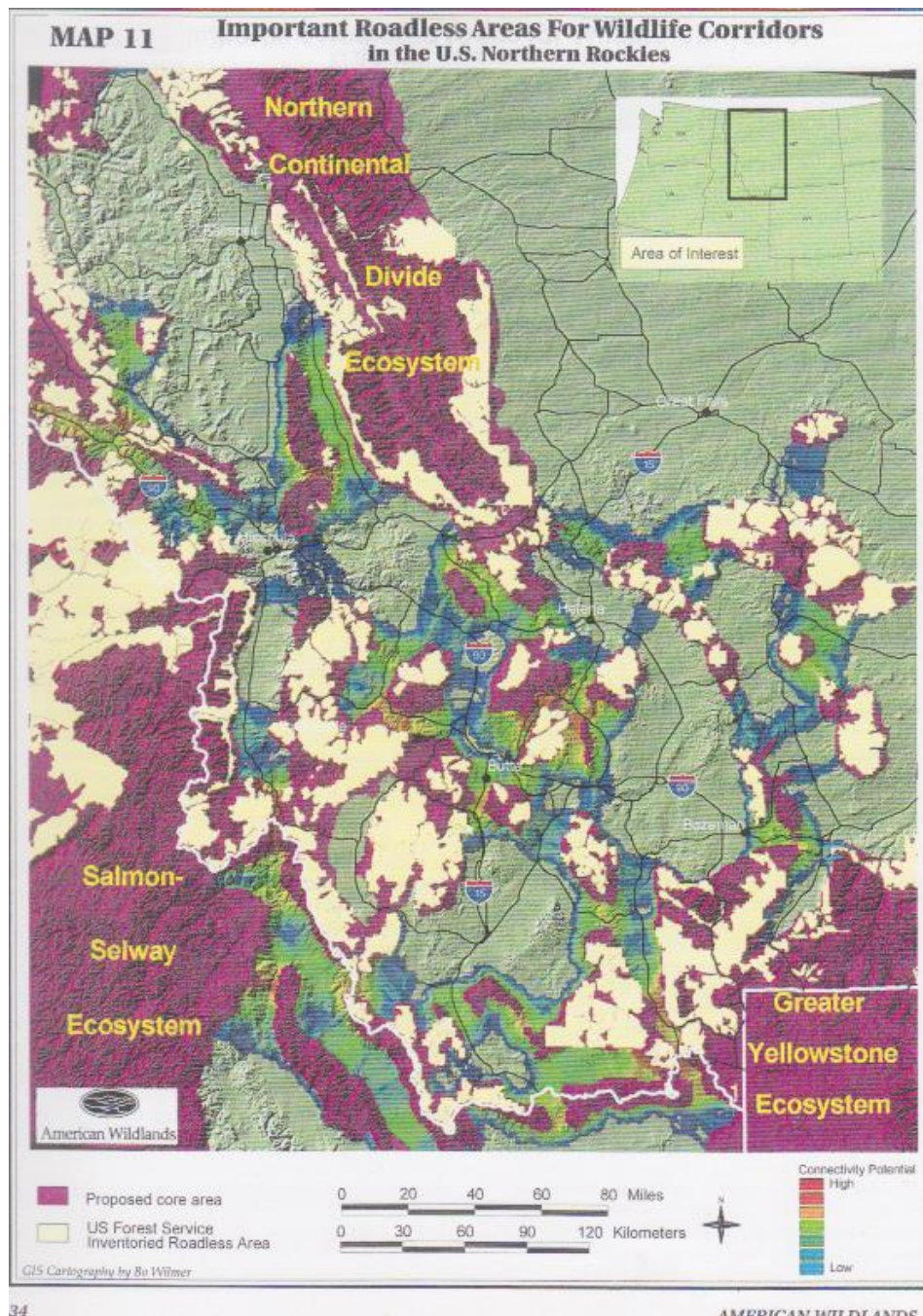
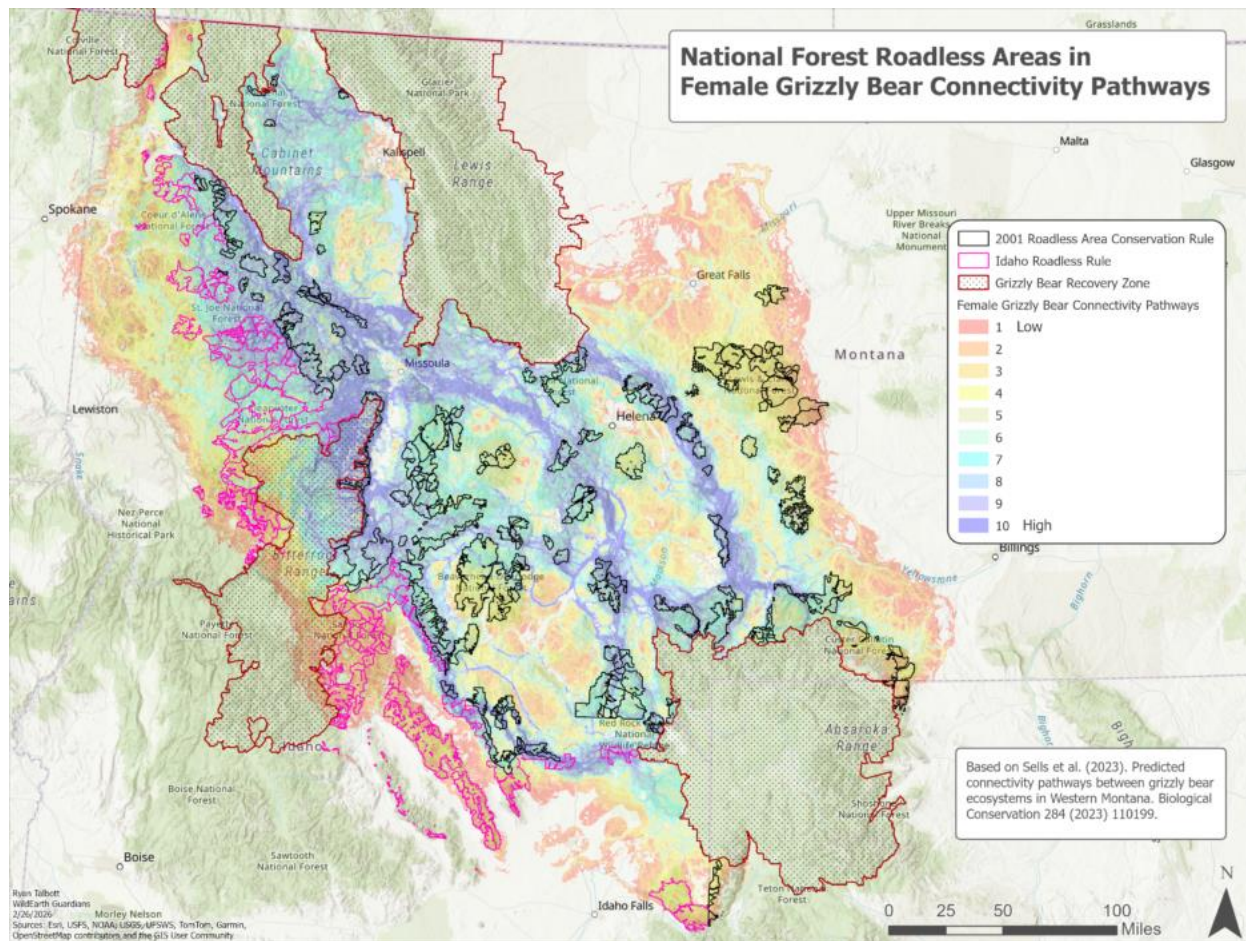


Figure 1. Source: Walker and Craighead 1997.



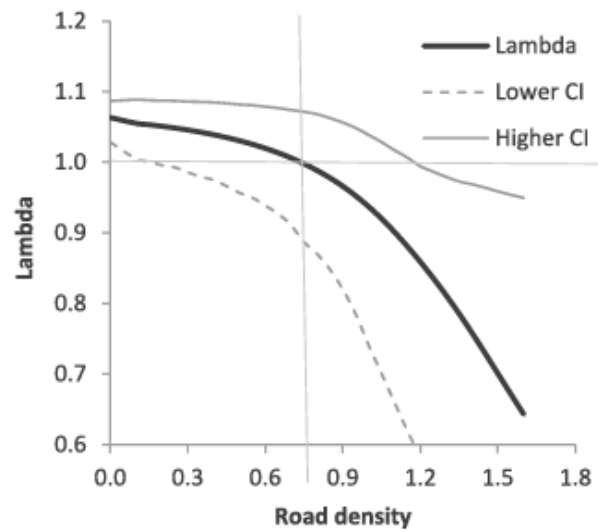


Fig. 3. Road density threshold for stable population growth relative to female grizzly bear (*Ursus arctos*) survival in western Alberta, Canada between 1999 and 2012. The reproductive state of females was considered as a variable when developing this curve. Females with dependent offspring had lower survival, relative to road density, than females without offspring. Adapted from Boulanger and Stenhouse (2014). Areas with road densities >0.75 km/km² correspondingly had Lambda (population growth), values <1.0 , representing population decline. 'CI' is confidence interval.

Figure 3. Source: Proctor et al. 2019

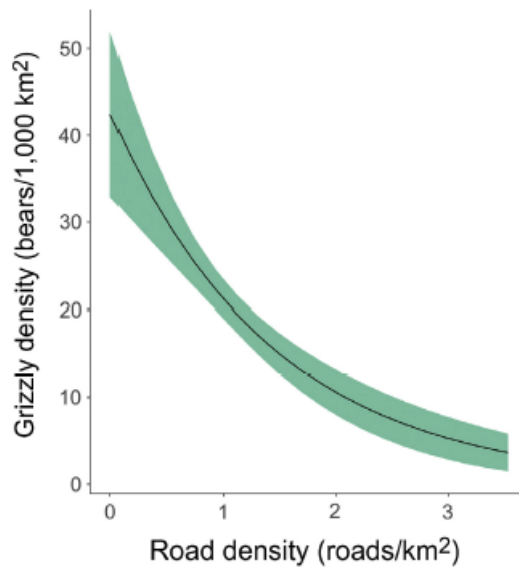


Figure 4. Source: Lamb et al. 2019

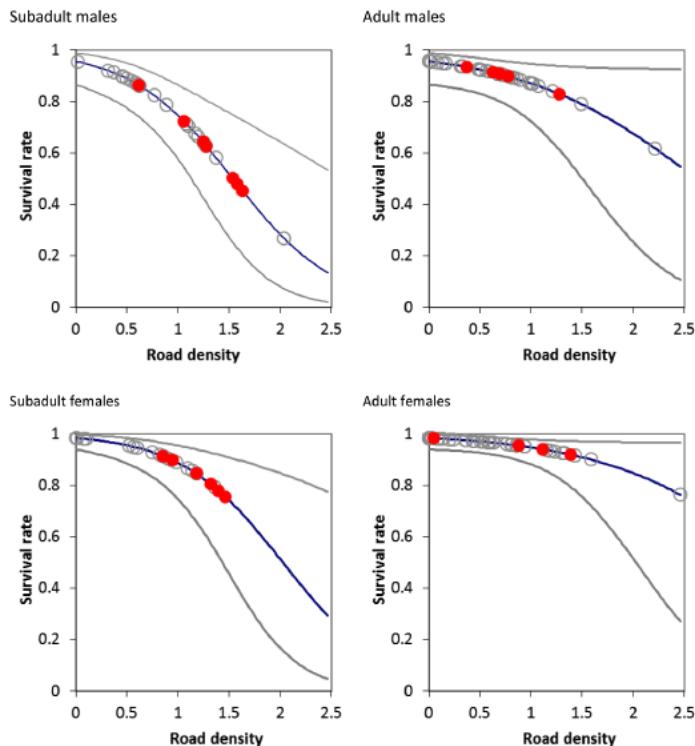


Figure 5. Source: Boulanger and Stenhouse 2014.

Conversely, roads have increased mortality risk to grizzly bears (U.S. Fish & Wildlife Service (2024). The U.S. Fish & Wildlife Service Species Status Assessment (SSA) for Grizzly Bears (2024) states: *In general, road access probably poses the most imminent threat to grizzly bear habitat, and therefore the Recovery Plan recommended that road management be given the highest priority for grizzly bear recovery* (Service 1993:21-22).

The SSA at page 113: *“In general, motorized access brings humans into grizzly bear habitats, and increased human presence may disturb, displace, or kill grizzly bears if human-interactions trigger activities that are associated with human-caused mortality, such as defense-of-life kills or management removals.”*

The Service wrote: *Unmanaged motorized access: (1) increases human interaction and grizzly bear mortality risk; (2) increases displacement from important habitat; (3) increases habituation to humans; and (4) decreases habitat where energetic (i.e., food) requirements can be met* (Mattson et al. 1987, pp.

269–271; McLellan and Shackleton 1988, pp. 458–459; McLellan 1989, pp. 1862–1864; Mace et al. 1996, pp. 1402–1403; Schwartz et al. 2010a, p. 661).” (emphasis provided).

At page 139 the SSA notes the threats associated with building roads in roadless areas: *Increasing mortality risk as a result of increased human-grizzly bear encounters or displacement due to new roads into previously roadless areas and/or increased vehicular use on existing restricted roads, especially if roads remain open to the public after vegetation management is complete* (McLellan and Shackleton 1988, pp. 458–459; McLellan and Shackleton 1989b, pp. 377–379; Mace et al. 1996, pp. 1402–1403; Schwartz et al. 2010a, p. 661; Boulanger and Stenhouse 2014, p. 15; Proctor et al. 2017, pp. 53–54; Lamb et al. 2018, pp. 1412–1415; Proctor et al. 2019, entire).

Poaching of all wildlife species increases with road access.

The highest survival rate for grizzly bears is at zero road density (Boulanger and Stenhouse 2014). The highest density of grizzly bears is at zero road density (Lamb et al. 2019).

Elk habitat effectiveness is 100% at zero road density (Lyon 1983).

Mildrexler et al. (2026) found roadless areas had the highest integrity forest ecosystems in the U.S. and Dietz et al. (2021) found roadless areas contribute to habitat for vulnerable wildlife species out of proportion to their total area size. Talty et al. (2020) concluded that roadless areas reduce isolation between protected areas.

Bull trout will go extinct without protection for roadless areas and delisting will never legally occur. Salmon spawning areas will be lost. Elk populations will plummet. Old growth forests will be diminished. Climate change refugia will be eliminated. Local and regional economies will suffer. America’s natural heritage will be stolen from present and future generations.

Roadless areas provide the most reliable and cleanest water supplies to human communities, reducing the costs of filtration and cleaning. Costs of water treatment would increase for municipalities and obtaining alternate water supplies exorbitant. Citizens will be prevented from watering their lawns under water rationing.

The fire rhetoric and scare tactics are disingenuous and perfidious. Building new roads within roadless areas will increase the risk of new fire starts due to increased human access. Fires are more than four times more likely to start near a road.

Aplet, et al. (2026) found that wildfire ignition density was lowest in Wilderness followed closely by inventoried roadless area. The highest wildfire ignition density was within 50m of roads. The next highest wildfire ignition density was in all other non-Wilderness and non-roadless U.S. National Forest System lands. As distance to roads increased, wildfire ignition density decreased. These figures were most pronounced with human-caused fires. They concluded that building roads in roadless areas is likely to result in more fires due to increased human access.

A letter from 32 scientists to Agriculture Secretary Rollins confirms these findings and cites several studies with similar results (Pritchard et al. 2025).

Balch et al. (2017) found that approximately 85% of all fires were human-caused and increased fire ignitions follow road networks. Fire ignitions increased with increased levels of recreation (Jorge et al. 2025).

Roadless areas, by definition, are remote and not close to human communities and residences. There are no residences on National Forest lands. Roadless areas are almost exclusively located in the higher elevations of watersheds, far from any communities.

By contrast, extreme fire behavior most often occurs within highly managed lower elevation landscapes where there is logging slash and brushy regrowth after extensive removal of forest cover. Open areas have higher exposure to wind and solar radiation which dries out vegetation and other ground fuels. These flashy fuels, aided by increased wind conditions, support increased rates of fire spread into adjacent communities where they transition to urban fires where homes and other structures become ground fuels. The high road and trail densities in these managed landscapes enable increased human access and a far greater number of new ignitions compared to high elevation roadless areas.

The communities most recently seriously affected by wildfires have been in heavily managed forest areas, brush and grasslands. Palisades, California; Paradise, California; Denton, Montana, Spokane, Washington. None were affected by fires in roadless areas.

The costs of road construction and the subsidized logging within roadless areas would be borne by the American taxpayers, not the logging companies. Logging in remote roadless areas with steep slopes can only be done at below-cost. Add the loss of wildlife and fish, water supply and quality and lost income from hunting, fishing, recreation and existence value, development of roadless areas is nonsensical.

Moreover, there is a massive backlog of maintenance required for the existing 386,000 miles of roads on National Forests, totaling over \$7 billion. Adding to this price tag is fiscally irresponsible and burdens the American taxpayer. Selling forests off at below-cost adds insult to injury.

We oppose the effort to localize decisions on roadless areas. These are national assets and there should be one national rule governing their protection.

Repealing the roadless rule must have extensive analysis of cumulative effects of this and other proposed rules and regulations for gutting the National Travel Management Rule, the change in the definition of harm within the ESA, proposed new rules under 4(d) of the ESA that will dramatically increase the killing of grizzly bears, the move towards proposing removing ESA protections for grizzly bears, the Emergency Situation Determinations and Categorical Exclusions under NEPA based on exaggerated and often phony fire claims. Fast-track authority for mining and the Executive Order on Expanding American Timber Production are additional cumulative effects. Rescinding the Roadless Area Conservation Rule piles on these actions and

will cumulatively degrade the National Forest System in violation of long-standing laws and policies.

Rescinding the Roadless Rule will require amendment of nearly every National Forest Plan causing time consuming disruptions and needless expense.

The Forest Service has a massive maintenance backlog on the existing bloated road system and allowing new road construction on millions of acres of National Forests will expand this backlog. This would cause irreparable damage to resources including wildlife and fish habitat and water quality and threaten communities with increased risk of catastrophic landslides and flash flooding.

Patty Ames

Patty Ames, President

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