

2026 Oregon Roadless Rule Comment Writing Toolkit

This toolkit exists to give the public the information and resources they need to write substantive comments in defense of the Roadless Rule.

Comments on the Roadless Rule can be submitted until midnight on **Monday, September 21** through [Oregon Wild's Website](#) or the government's [Public Comment Portal Link](#)

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Background

The Trump Administration's Department of Agriculture unveiled its latest plans to repeal the popular Roadless Area Conservation Rule, a proposal that would eliminate protections for America's wildest forests across nearly 45 million acres of National Forest land, including 2 million acres in Oregon.

[Protected Roadless areas in Oregon](#) include Larch Mountain, Lost Lake, and the Salmon River Trail (Mount Hood National Forest), Iron Mountain and Hardesty Mountain (Willamette National Forest), Oregon Dunes (Siuslaw National Forest), Lookout Mountain (Ochoco National Forest), Joseph Canyon (Wallowa-Whitman National Forest), and Tumalo Mountain (Deschutes National Forest). Roadless areas are some of the last intact landscapes in America, providing clean water, critical wildlife habitat, and world-class recreation opportunities.

In a shortened, three-week comment period in 2025, more than 99% of public comments opposed repealing the Roadless Rule. Despite this near-unanimous public opposition, the Trump administration is still moving forward with its plan to eliminate protections for America's roadless forests. A second comment period is now open through September 21, 2026. This is potentially the last opportunity for the public to weigh in on this proposal.

The Forest Service released a legally required [draft Environmental Impact Statement \(DEIS\)](#) on the proposal, which outlines the proposal and the potential environmental impacts of the

proposed alternatives. The administration is proposing 3 alternatives: Alternative 1, the No Action alternative (the Roadless Rule stays in place); Alternative 2, the Proposed Action (full repeal of the Roadless Rule - this is what the administration is planning to do); and Alternative 3 (a partial repeal of the Roadless Rule). Read Oregon Wild's full [analysis of the DEIS here](#) (or read the talking points [below](#)). Your public comment should refer to the points in the DEIS and the proposed alternative actions.

Now that the second comment period is open, we need as much public support as possible in defense of the Roadless Rule. Below is a list of resources to walk you through the process of writing an effective and meaningful public comment.

What is a public comment?

Our national public lands are managed on our behalf by federal agencies that are required to make informed decisions and involve the public in the process. The foundational environmental law for this is NEPA, the National Environmental Policy Act. It requires federal land management agencies to complete an analysis of the significant impacts of proposed activities and weigh and consider alternatives to proposed plans. In addition to analyzing the environmental impacts, the agency is also required to notify the public and provide an opportunity for public input. This often comes in the form of a public comment period—though recent changes have reduced such public input and transparency.

Submitting comments on proposed projects is a great way to make your voice heard, show that the public is paying attention, and get to know how the process really works. You don't have to be an expert, use scientific citations, or be a great writer to submit a comment. Just share your personal perspective on why you care about the area and what your concerns are about the project.

The purpose of this toolkit is to help the public craft **substantive comments**, but there are three different types of public comments you can submit, each with pros and cons.

- **Generic/form/bulk comment:** these are “petition” style comments where you add your name and submit a pre-written comment, usually through an organization website. These are quick and easy and can generate a lot of comments (good for showing widespread public support/opposition), but they are not weighted as heavily by the agency since they are not individual or unique. Submit a form comment on the Roadless Rule rescission on [Oregon Wild's website](#).
- **Unique/individual comment:** This is a comment written and submitted by an individual using their own words. This takes more time and effort, but will be counted as its own unique comment by the agency and given more weight. These can still be short and simple and focus more on general ideas rather than raising specific issues in the

analysis/proposal. **Pro-tip:** all generic/form comments from Oregon Wild can be edited. Add in a few sentences about specific issues or places to make your comment unique.

- **Substantive comment:** If you have the time, these are the most effective. This is an individual/unique comment, but points to specific issues in the analysis/proposal. The agency is required to respond to substantive issues raised in comments. Substantive comments can also help inform any future litigation on the issue. To submit a unique or substantive comment on the Roadless Rule rescission, submit directly through the [government portal at regulations.gov](https://www.regulations.gov).

What to include in your comment

Comment letters should always **be clear as to what proposal (e.g. Roadless Rule rescission) you are addressing, and focus on specific elements of the proposal and the environmental analysis (e.g. DEIS)** if at all possible – not just general issues. This way, the agency is required to respond, whereas they often blow off general issues and can say they are outside the scope of the specific project. For example, saying that you want them to maintain protections for a specific roadless area because logging there would harm wildlife/recreation/water/etc is better than just saying you don't like the proposal and want them to stop planning it.

Here are some questions to stimulate ideas for comments:

- Did they consider the best science? Is there new information about climate change, wildlife, etc that they should be considering?
- Did they fail to consider something important? For example, would removing these protections impact a rare species' habitat that they failed to mention?
- Will the proposed action cause ecological harm you are concerned about, such as wildlife habitat like snags and down logs; water quality; fragmenting intact wild areas; carbon storage/sequestration impacts if they are opening potential cutting to older trees; impacts of roads; or impacts to a trail or scenic view.

Visit affected roadless areas and strengthen your comments with pictures of the good and bad of what you see, or otherwise make note of any personal connection you have to the area.

Be sure you're submitting your comment to the right place and by any listed deadlines. The deadline to comment on the Roadless Rule draft EIS is September 21, 2026. Submit your comment through [regulations.gov](https://www.regulations.gov).

While most contact information is optional, **be sure to at least include your email address so the agency can respond to your comments.** Be aware that your comment will become a part of the public record.

Sample outline for your comment letter

- Start with “I oppose the proposal to fully or partially rescind the Roadless Area Conservation Rule.”
- Who you are
 - Where you live, what you do for a living (if relevant), why public lands matter to you
- Why you care about an affected area
 - Name specific areas that will be impacted and what you do there or why you care about it (hike, hunt, fish, camp, clean drinking water, wildlife, etc).
 - [Interactive Map of Oregon Roadless Areas](#)
- Pick some talking points that appeal to you
 - See resources below
- Tell the Forest Service what you want them to do. Be specific!
 - Say something like, “For the reasons listed above, fully or partially rescinding the Roadless Rule under Alternatives 2 and 3 of the draft EIS would be a grave mistake...”
 - State again that you “oppose the proposal to rescind or alter the Roadless Rule,” and support “Alternative 1, the No Action alternative.”

Resources to inform your comment

- Roadless Rule Analysis and Information
 - [Forest Service Roadless Rule DEIS](#)
 - [Oregon Wild's Analysis of the Roadless DEIS](#)
 - [Roadless Rule Background Information](#)
 - [Interactive Map of Oregon Roadless Areas](#)
 - [List of Oregon Communities with Roadless Drinking Water Sources](#)
 - [Near Unanimous Support for the Roadless Rule in 2025](#)
 - [Roadless Rule History Timeline](#)
- Comment writing tools
 - Our friends at More Than Just Parks created a great [Roadless comment writing tool](#) to help you craft a substantive public comment. This tool will give you a unique, substantive comment to submit based on where you live, which Roadless Areas you visit, and activities you enjoy doing in Roadless Areas. [Check it out!](#)

Oregon Wild DEIS analysis

[Read the full Oregon Wild analysis here.](#)

Talking points from the analysis to include (pick the ones that matter most to you):

- According to the administration's DEIS, eliminating the Roadless Rule would:
 - **Cause a Loss in Recreation and Visitor Spending:** The administration estimates that eliminating the Roadless Rule would degrade roadless areas and backcountry access to millions of acres, resulting in a loss of \$9 million in annual visitor spending in local communities.
 - **Imperil Wildlife:** Eliminating the Roadless Rule would “adversely affect” 327 threatened and endangered species and 71 designated critical habitats for these species. In Oregon, this includes listed species such as Bull trout, Chinook salmon, Chum salmon, Coho salmon, Marbled murrelet, Northern spotted owl, Oregon silverspot butterfly, Oregon spotted frog, Sierra Nevada red fox, and steelhead, among others.
 - **Threaten Water Quality:** According to the DEIS, “... inventoried roadless areas typically have good water quality due to limited disturbance,” and “Road construction and native surface forest roads are the largest source of sediment related to timber harvest operations, and sediment delivered to surface waters is a major source of water quality degradation.” Communities like Bend, Eugene, La Grande, Ashland, and others in Oregon receive drinking water from watersheds fully or partially within IRAs.
 - **Spread Invasive Species:** The DEIS states that increased road construction and timber harvest are likely to “introduce and spread invasive plant species due to ground disturbance.” Invasive plants tend to be more flammable, leading to higher wildfire risk, and can outcompete native plant species.
 - **Undermines Tribal Interests:** During the legally required Tribal consultation process, the administration found that “the majority sentiment among Tribal governments consulted is opposition to the proposed rescission.” Its analysis concedes that timber harvest and road construction in these areas “could have long-term negative effects on Tribal rights and interests.”
 - **Could Increase Fire Risk:** The administration admits “Road density is linked to human-caused wildfires, and as the density of roads increases so does the probability, number, and frequency of wildfire ignitions.” [Recent studies](#) have found that fires are 4 times more likely to start near a road than in a roadless area.
 - **Add to Infrastructure Backlog:** According to the DEIS, the Forest Service could build new roads across 18.2 million acres (44.5% of current IRAs) in the short term. This would significantly inflate the deferred maintenance backlog, which is already over \$6.9 billion.

Example comment

Dear Secretary Rollins,

I strongly oppose the USDA's proposal to fully or partially rescind the Roadless Area Conservation Rule. This reckless action would devastate our public lands, waste taxpayer resources, and undermine the clean water, wildlife habitat, and recreation opportunities that millions of Americans depend on. I urge the agency to take Alternative 1, the No Action alternative and retain full Roadless Rule protections.

I live in Bend, Oregon and spend time recreating in nearby Roadless Areas like Tumalo Mountain, the Cascade Lakes, Lookout Mountain in the Ochoco National Forest, and North and South Paulina in the Newberry Caldera. I also visit other Roadless Areas across Oregon to hike, camp, fish, forage, and enjoy nature. The Tumalo Mountain Roadless Area is especially important to me because it protects my community's drinking watershed at Bridge Creek.

Under the agency's proposal, Alternative 2 would eliminate protections for nearly 2 million acres of wild, public lands in Oregon. Under Alternative 3, 1.4 million acres (nearly 75% of IRA acres in Oregon) would lose protections, including the ones I listed above.

The economics of these attacks on the Roadless Rule simply do not add up. Building new logging roads in remote backcountry areas is extraordinarily expensive, leaving taxpayers with billions of dollars in long-term maintenance costs for roads that are rarely, if ever, used. According to the DEIS, the Forest Service could build new roads across 18.2 million acres (44.5% of current IRAs) in the short term. This would significantly inflate the deferred maintenance backlog, which is already over \$6.9 billion according to the DEIS. Further, the DEIS estimates that eliminating the Roadless Rule would degrade roadless areas and backcountry access to millions of acres, resulting in a loss of \$9 million in annual visitor spending in local communities.

Beyond the economic folly, the environmental consequences are severe. Roadless forests represent some of the most intact, resilient ecosystems left in our country. They filter and store clean water, provide refuge for vulnerable species, and serve as critical carbon sinks in the fight against climate change.

The DEIS states that eliminating the Roadless Rule would "adversely affect" 327 threatened and endangered species and 71 designated critical habitats for these species. In Oregon, this includes listed species such as Bull trout, Chinook salmon, Chum salmon, Coho salmon, Marbled murrelet, Northern spotted owl, Oregon silverspot butterfly, Oregon spotted frog, Sierra Nevada

red fox, and steelhead, among others. How would the agency ensure these populations and their habitats aren't further degraded without protection of the Roadless Rule?

The DEIS also states that "Road construction and native surface forest roads are the largest source of sediment related to timber harvest operations, and sediment delivered to surface waters is a major source of water quality degradation." Bend, Oregon has exceptional water quality, largely due to the protections of the surrounding Tumalo Mountain - Bend Watershed Roadless Area. This Roadless Area would lose protections under both Alternatives 2 and 3. Other communities in Oregon like Eugene, Ashland, and La Grande would also lose protections to their drinking watersheds. How would the agency ensure that these watersheds remain intact and that water sources are not compromised from increased risk of erosion and sedimentation?

Once roads and clearcuts fragment these landscapes, the damage is permanent. In the DEIS, the agency admits that "Road density is linked to human-caused wildfires, and as the density of roads increases so does the probability, number, and frequency of wildfire ignitions." [Recent studies](#) have found that fires are 4 times more likely to start near a road than in a roadless area. I am concerned that removing Roadless Rule protections would *increase* fire risk in our nation's backcountry forests. The DEIS also acknowledges that increased road construction and timber harvest are likely to "introduce and spread invasive plant species due to ground disturbance." Invasive plants tend to be more flammable, leading to higher wildfire risk, and can outcompete native plant species.

Lately, I am appalled by the USDA's decision to pursue this rollback through an abridged and inadequate public comment process. The original Roadless Rule was created after the most extensive public engagement process in the history of federal rulemaking, with over 95% of commenters supporting strong protections. During last fall's comment period on the Notice of Intent, over 600,000 Americans submitted public comments, with over 99% of comments opposing the proposed rescission of the rule. During the legally required Tribal consultation process, the agency found that "the majority sentiment among Tribal governments consulted is opposition to the proposed rescission." Its analysis concedes that timber harvest and road construction in these areas "could have long-term negative effects on Tribal rights and interests." Now, the agency is attempting to dismantle these protections through a rushed process that limits and ignores input from citizens, scientists, Tribes, and local communities. This is undemocratic and deeply irresponsible for decisions of such sweeping consequence.

The public comment period should immediately be extended to no shorter than a total of 120 days. Despite the shortened comment periods, the American public has already made their voice clear: keep the Roadless Rule in its full form in place. For more than two decades, the Roadless Rule has been a cornerstone of sound forest management, balancing ecological, economic, and cultural values. Instead of rolling back protections, the agency should strengthen its commitment to protecting America's roadless forests for the clean water, climate resilience, recreation, and biodiversity they provide.

For the reasons listed above, fully or partially rescinding the Roadless Rule under Alternatives 2 and 3 of the draft EIS would be a grave mistake. I oppose the proposal to rescind or alter the Roadless Rule, and support Alternative 1, the No Action alternative.

How to submit your public comment

Comments on the Roadless Rule can be submitted until midnight on **Monday, September 21** through the [Public Comment Portal Link](#), [Oregon Wild's Website](#), or mailed in.

Regulations.gov public comment portal (Preferred method for unique, substantive comments)

- Submit through the [regulations.gov](#) portal
- Character count is 5,000 characters. If your comment is longer than 5,000 characters, you can upload a PDF of your comment.
- You can also upload photos, supporting documents, and other files

Oregon Wild website (if you are short on time)

- Submit through [Oregon Wild's comment portal](#)
- Form letter/generic comment
- The comment can be edited. Add in individual information (e.g. Roadless Areas you visit, why you care about protecting Roadless Areas, etc) to make the comment unique.

Mail in

- Mail a letter to **Director, Ecosystem Management Coordination, 201 14th Street SW, Mailstop 1108, Washington, DC 20250-1124**
- Letters must be *received* by the deadline - not just postmarked. Make sure to send it with enough time to be received and counted by the deadline.
- Include the Docket # FS-2025-0001 and/or RIN 0596-AD66 at the top of the letter

Other ways to take action

In addition to writing and submitting comments through the official NEPA process, there are other ways to weigh in on proposed forest management projects like the Roadless Rule rescission.

- Contact your members of Congress (call the Capitol Switchboard 202-224-3121) and tell them to oppose the Roadless Rule rescission and to support the Roadless Area Conservation Act, which would provide durable, legislative protections for Roadless Areas.

- Submit a letter to the editor or op-ed to your local paper. Use our [Roadless LTE toolkit](#) to craft and submit yours today!
- Share on social media. That can mean making your own post - maybe while you're out hiking - or liking, sharing, or commenting on others to amplify their reach. Follow [@OregonWild](#) to get started!
- Use our [Activist Toolkit](#) for more resources on taking action.
- Or check out our [upcoming events](#) for opportunities to attend rallies, hikes, or other events relating to public lands defense.