

August 18, 2026

USDA Forest Service
Attn: Director, Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

Re: Request for Comment Period Extension and Public Meetings on Draft Environmental Impact Statement and Proposed Rule Regarding Rescission of 2001 Roadless Area Conservation Rule (Docket No. FS-2025-0001)

Dear Secretary Rollins,

The undersigned Oregon organizations hereby request that the U.S. Forest Service extend the period for written comment and host accessible public meetings throughout the country concerning the Draft Environmental Impact Statement (DEIS) and Proposed Rule regarding the rescission of the Roadless Area Conservation Rule (Roadless Rule). On August 18, 2026, your agency issued the DEIS and Proposed Rule and allowed the public only 30 days to submit comments on these major new actions. Such a short comment period for an environmental analysis and proposed rule of this magnitude and significance is grossly inadequate and should promptly be extended. In addition, public meetings should be promptly scheduled in population centers and affected locations across Oregon.

For 25 years, the Roadless Rule has safeguarded nearly 45 million acres of America's National Forests, including two million acres in Oregon. This policy protects many of our country's most valued backcountry areas and provides clean water, clean air, vital wildlife habitat, and diverse recreation opportunities, while still allowing responsible forest management. A recent study concluded that Roadless Areas protected by the Roadless Rule are made up of "high-integrity forests" and provide irreplaceable ecological and economic values that are threatened by the proposed rescission of the Roadless Rule.¹

The Roadless Rule's protections should be sustained for the benefit of present and future generations of Americans. But at minimum, before deciding whether to strip away the Rule's protections, the Forest Service must provide a reasonable opportunity for meaningful public engagement on the proposed rescission.

The Forest Service's allowance of only 30 days for public comment is woefully inadequate for this purpose. Meaningful engagement with the DEIS and Proposed Rule requires analysis of detailed factual and scientific information that cannot reasonably be completed, compiled, and presented to the agency in only 30 days. In addition, the 30 day comment period is starkly out of proportion with the comment process that preceded promulgation of the Roadless Rule. Before the Roadless Rule was originally adopted in 2001, the Forest Service provided a total of 129 days for the public to comment on the Notice of Intent and the Proposed Roadless Rule and held

¹ Mildrexler, D. J., Berner, L. T., Law, B. E., & Booth, M. S. (2026). Roadless rule rescission threatens highest integrity forest ecosystems in the United States. *Biological Conservation*, 321, 111950.
<https://doi.org/10.1016/j.biocon.2026.111950>

more than 400 public meetings across the country after issuing the proposed rule. And even when the Bush administration unlawfully sought to rescind the Rule in 2005, the Forest Service ultimately offered over 120 days for public comment on the proposed rescission.

In sum, responsible and respectful management of our nation's public lands demands an immediate extension of the period for public comment on the DEIS and Proposed Rule. Accordingly, the undersigned organizations hereby request that the Forest Service extend the comment period for these actions to a total of 120 days, to Friday, December 18 or later. In addition, the Forest Service should host accessible public meetings in affected areas around the country concerning the DEIS and Proposed Rule, as the agency did in promulgating the Roadless Rule that it now seeks to rescind or alter.

Sincerely,

Oregon Wild

Central Oregon LandWatch

Firefighters United for Safety, Ethics, and Ecology (FUSEE)

Soda Mountain Wilderness Council

Wild Hope

Cascadia Wildlands

Klamath-Siskiyou Wildlands Center

Sierra Club, Oregon Chapter

Great Old Broads for Wilderness, Willamette Valley Broadband

Great Old Broads for Wilderness, Central and Eastern Oregon Bitterbrush Broadband

Bird Alliance of Oregon

Umpqua Watersheds

Native Fish Society