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Initial Analysis of Roadless Rule Rescission Draft Environmental Impact Statement

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.

The [draft Environmental Impact Statement](#) (draft EIS) offers three alternatives, with a complete elimination of the Roadless Rule across all 45 million acres as the proposed alternative. Other alternatives described in the draft EIS would either fully retain the current Roadless Rule, or eliminate protections for 31.7 million acres, including currently roadless acres that are within half a mile of an existing road. These alternatives are described in more detail below.

The publication of the draft EIS on August 20 starts a short 30-day public comment period that runs until September 21. Comments can be submitted at [regulations.gov](https://www.regulations.gov).

Eliminating the Roadless Rule would:

- Remove protections for 45 million acres of the wildest and most intact public lands across our National Forests, including 2 million acres in Oregon;
- Allow road construction, development, and commercial logging in currently protected Inventoried Roadless Areas;
- Increase fire risk in backcountry forests. The Roadless Rule helps protect areas that are fire resilient and less prone to wildfire ignitions. [Studies](#) show that fires are 4x more likely to start near a road than in a roadless forest, and logging can increase fire hazard;
- Allow increased logging and roads that threaten clean drinking water sources. The Roadless Rule helps safeguard watersheds that provide drinking water to over 2.2 million Oregonians;
- Impair habitat for sensitive species and degrade our most intact and resilient ecosystems. Roadless areas provide some of the last best habitat areas that are still developing under the natural processes and landscape patterns that wildlife evolved with. Opening roadless areas to logging and road-building will create more degraded and fragmented habitat that is already vastly over-abundant;

- Threaten Indigenous cultural values and sources of traditional foods, fiber, and medicines. The draft EIS states that “the majority sentiment among Tribal governments consulted is opposition to the proposed rescission”;
- Increase taxpayer burden. The existing National Forest road system already has a \$6.9 billion deferred maintenance backlog according to the draft EIS. The Forest Service already lacks enough staff and funds to maintain existing roads, and building more roads in forests will only increase that backlog;
- Ignore the will of the American public. When the Clinton Administration first proposed the Roadless Rule back in 2000, it received well over a million public comments supporting the rule, more than any administrative proposal in US history at the time. When the Trump Administration initially proposed rescinding the Roadless Rule last September, over 600,000 Americans submitted public comments, with over 99% of comments urging that the Roadless Rule be retained.

Background on the Roadless Area Conservation Rule

In the decades following the passage of the Wilderness Act in 1964, the Forest Service assessed the lands it manages for wilderness eligibility—generally larger than 5,000 acres and without clear evidence of roads and past logging. These previously assessed roadless areas are now referred to as “inventoried roadless areas,” or IRAs. Since that assessment process, Congress designated some IRAs as wilderness, while a relatively small number of IRAs were logged and roaded.

To address the millions of acres of IRAs that remained relatively unspoiled but without permanent wilderness designation, the Clinton Administration undertook an extensive and unprecedented public engagement process. This led to the official adoption of the Roadless Rule in 2001 to protect IRAs across the National Forest System. The Rule originally applied to 58.5 million acres of public lands across 39 states and prohibited new road construction, most logging, oil and gas drilling, and other industrial activities in IRAs. Over 1.6 million Americans submitted public comments on the proposal to create the Roadless Rule, with 95% in support of protecting wild, roadless forests.

The Forest Service created the rule to protect America’s last remaining wild forests, which serve as the headwaters of the nation’s drinking water supply, and to help alleviate a rapidly accelerating deferred maintenance backlog on road repairs. With over 386,000 miles of roads—over twice as many as the US highway system—crossing the National Forest System, the Forest Service could not afford to properly maintain its vastly overbuilt road network, leading to a deferred maintenance backlog reaching over \$6.9 billion that has been subsidized by taxpayers.

Unmaintained roads pose a variety of serious ecological risks, including landslides, culvert failure, serious erosion and water pollution, hydrologic disruption, weeds, fish and wildlife habitat degradation, and more. A prohibition on new roads in roadless forests allowed the Forest

Service to focus resources on maintaining its existing road network, while keeping intact forests undeveloped and wild.

Despite its general prohibition on road construction and commercial logging—and in contrast to a stricter wilderness designation—the Roadless Rule provides exceptions in the case of emergencies (e.g., wildfire fighting, floods, etc.) and for genuine restoration and wildfire risk reduction efforts.

Colorado and Idaho later created their own state-specific Roadless Rules, with more exceptions for logging than the general Roadless Rule. These state rules are not included in the proposed Roadless Rule rescission. The proposed action applies to the 45 million acres of IRAs outside of Colorado and Idaho that fall under the overarching federal roadless policy.

Potentially [impacted roadless areas in Oregon](#) include popular recreation destinations like Lost Lake near Mount Hood, the sweeping views and wildflower meadows of Iron Mountain in the Old Cascades, Larch Mountain in the Columbia River Gorge, Tumalo Mountain and the Cascade Lakes outside Bend, Hardesty Mountain near Eugene, Rough and Ready Creek in the Kalmiopsis region of southwest Oregon, Joseph Canyon and the Elkhorn Crest in northeast Oregon, and Lookout Mountain in the Ochocos.

Roadless Rule Draft EIS - Alternatives Considered

- Alternative 1 (No Action): Roadless Rule fully retained across 45 million acres of IRAs
- Alternative 2 (Proposed Action): Roadless Rule fully rescinded across 45 million acres of IRAs
- Alternative 3: Roadless Rule protections rescinded across 31.7 million acres, including within currently roadless areas within a half mile of an existing road

Analysis

Alternative 2, the proposed action, would fully eliminate existing protections for nearly 45 million acres of IRAs, including 2 million acres in Oregon. These acres would instead be again subject to aggressive road-building, commercial logging, and other development under the Trump Administration’s “maximum timber extraction” agenda designed to benefit industry allies at the expense of public values. Drinking water quality for millions of Americans, habitat and connectivity for imperiled species, and the overall ecological integrity of some of our last remaining wild landscapes would all be quickly eroded without current Roadless Rule protections in place. As roads are punched into existing IRAs, new fire starts will increase, further threatening both humans and forests, and further stressing already-stretched wildfire-fighting personnel and resources.

- **Roads.** According to the draft EIS, 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 for passenger car roads (Figure 7 of draft EIS).

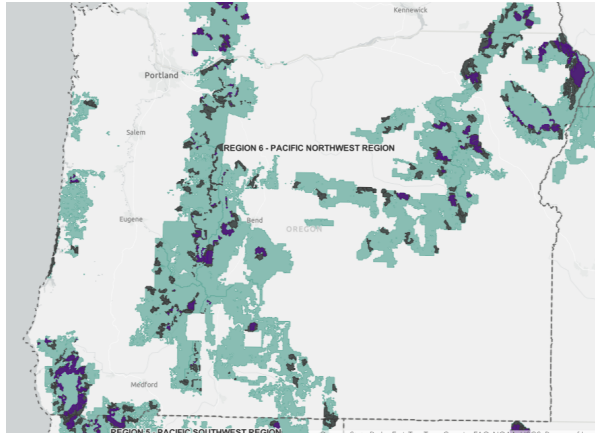
- **Fire.** In its own analysis of the potential impacts of rescinding the Roadless Rule, the Forest Service admits that “Road density is linked to human-caused wildfires, and as the density of roads increases so does the probability, number, and frequency of wildfire ignitions.” [Recent studies](#) have found that fires are 4 times more likely to start near a road than in a roadless area.
- **Wildlife.** The Forest Service’s analysis found that Alternative 2 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.
- **Water quality.** The draft EIS states that increased road construction and timber harvest under Alternative 2 could lead to more erosion and sedimentation, which could negatively affect water quality and municipal water use. According to the document, “Potentially affected 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.” Forest Service data show that there are more than 7,000 municipal water intakes within IRAs, with the most (over 1500) occurring in the Pacific Northwest. Communities like Bend, Eugene, La Grande, Ashland, and others in Oregon receive drinking water from watersheds fully or partially within IRAs.
- **Invasive species.** The draft EIS 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.
- **Recreation.** “In 2024, visitors to the national forests and grasslands potentially affected by the roadless rule rescission spent \$8.5 billion in local communities during their recreation visits” (Table 49 of draft EIS); that includes over \$1.1 billion in the Pacific Northwest. The Forest Service estimates that Alternative 2 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 (p. 223 of draft EIS). Loss in roadless area recreation may also shift more visitation to already strained and under-resourced Wilderness areas nearby.
- **Tribal Rights and interests.** 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 of Alternative 2 concedes that timber harvest and road construction in these areas “could have long-term negative effects on Tribal rights and interests.” The administration is moving forward with this proposed

action anyway.

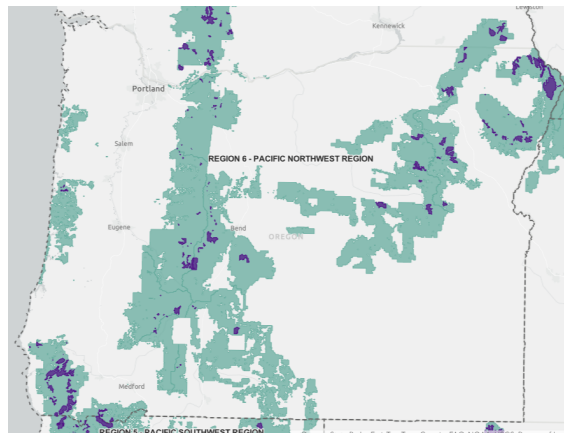
Alternative 3 would open up 31.7 million acres of IRAs to road-building, commercial logging, and other development. This alternative goes beyond eliminating or adjusting protections for roadless portions of the wildland-urban interface. Instead, it also eliminates protections for roadless areas that lie within half a mile of an existing road. By allowing new road-building and other development in such a wide swath of existing roadless acres, the ecological integrity and drinking water protections provided by what remains of adjacent IRAs would be severely undermined. Alternative 3 would also eliminate protections for existing IRAs that happen to fall within other congressionally designated areas, justified by the misleading suggestion that those congressional designations are inherently more protective and permanent. Finally, Alternative 3 would *completely* eliminate protections for all 9.3 million acres of IRAs in Alaska's Tongass National Forest, the last remaining intact temperate rainforest in the world. The same impacts from Alternative 2 would apply to the 31.7 million acres of IRA dropped under Alternative 3.

- **Roads.** According to the draft EIS, the Forest Service could build new roads across 14.2 million acres of current IRAs in the short term under Alternative 3.
- **Roadless acres dropped under Alternative 3**
 - 400,000 acres that are no longer considered National Forest System lands
 - 4.5 million acres that have other designations
 - 17.9 million acres that lie within half a mile of an existing road
 - 9.3 million acres (the entirety) of IRAs in the Tongass National Forest
 - 1.4 million acres in Oregon (75% of existing Oregon IRAs). Some Roadless Areas eliminated in Oregon under Alternative 3 include:
 - Larch Mountain
 - Hardesty Mountain
 - Olallie Lake
 - South Paulina
 - Tumalo Mountain (Bend Watershed)
 - Lookout Mountain
 - Brown Mountain
 - The Oregon Dunes
 - Mount Hebo
 - Echo Mountain
 - Middle Santiam
 - Crane Mountain
 - North Fork Malheur
 - Many, many more

Current Roadless Protections



Alternative 3 Roadless Protections



([Source](#))

Final Takeaways

The Trump Administration is relentless in its efforts to gut long-standing environmental protections for our last remaining wild places. Its plan to fully rescind the Roadless Rule despite near-unanimous public opposition is emblematic of the Administration's prioritization of industry profits over drinking water protections and other important public values that are solidly grounded in science.

Rescission of the Roadless Rule also continues the Trump Administration's coordinated attack on public lands and bedrock environmental laws. In addition to sowing chaos through a Forest Service reorganization designed to shed staff and capacity, the Administration has already weakened the National Environmental Policy Act and the Endangered Species Act, and it is finalizing proposals to upend the Northwest Forest Plan and gut large tree and stream protections in the Blue Mountains, as well as to quadruple logging with no guardrails on Western Oregon BLM lands.