



September 19, 2025
Brooke Rollins
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave, S.W.
Washington, DC 20250

Brad Kinder
Acting Director, Ecosystem Management
Coordination
U.S. Department of Agriculture
1400 Independence Ave, S.W.
Washington, DC 20250

Re: Comments on Notice of Intent to Prepare an Environmental Impact Statement and Initiate a Rulemaking on the Roadless Area Conservation Rule, Docket No. FS-2025-0001

Dear Secretary Rollins and Mr. Kinder:

On behalf of The Conservation Alliance and the Brands for Public Lands coalition including the undersigned businesses, we value the opportunity to submit comments on the U.S. Department of Agriculture's ("USDA") Notice of Intent for the proposed rescission of the Roadless Area Conservation Rule ("Roadless Rule"), which protects nearly 60 million acres of inventoried roadless areas across the nation. We are deeply disappointed that the agency is pursuing rescission or major changes to the Roadless Rule despite its broad public support and proven value to communities nationwide; however, we will engage constructively by providing substantive input throughout this process.

The Conservation Alliance and the Brands for Public Lands coalition represent businesses whose success depends on the sustainable management of forests, lands, and waters. **Contrary to Secretary Rollins' previous statements about the Roadless Rule, we assert that durable, time-tested land protections drive business innovation and prosperity across the U.S. and allow the \$1.2 trillion outdoor economy to grow and thrive.** The proposed rescission will have serious implications for this community. Therefore, The Conservation Alliance and Brands for Public Lands coalition are requesting the following actions as the USDA and USFS move forward on the Roadless Rule rescission effort.

Recreation Impacts Inventory

It is pertinent that businesses and community members understand how the USDA's proposed actions will impact recreation access and experiences across the country. We request that the agency prepare a comprehensive inventory of trails, waterways, and other recreation assets within roadless areas that would be affected by the proposed alternative published via the Draft Environmental Impact Statement ("DEIS") in early 2026. This inventory should quantify impacts on both motorized and non-motorized recreation. We request the ability to review and analyze the recreation impacts inventory no later than the date of the opening of the DEIS comment period.

Economic Analysis

The outdoor business community is economically reliant on protected public lands and waters. We request that USDA conduct a thorough and accurate economic assessment of the proposed alternative provided in the DEIS, including:

- Loss of ecosystem services currently provided by protected areas



- Projected economic impacts on gateway communities dependent on currently-protected roadless areas

We request the ability to review and analyze the economic impact analysis no later than the date of the opening of the DEIS comment period.

Robust Public Engagement

When the DEIS is released, we urge the USDA and USFS to implement a meaningful public feedback process that includes:

- Numerous in-person and virtual public meetings with ample advance notice in every state affected
- Accessible avenues for input from businesses, communities, and Tribes
- Adherence to National Environmental Policy Act (“NEPA”) and established land management processes to maximize transparency and collaboration
- A comment period of *at least 60 days* for the DEIS, in addition to considering a longer comment period for tribal communities

The Roadless Rule protects some of the most iconic, beloved, and economically valuable landscapes in the United States. These areas provide unmatched recreation opportunities, clean water for rural and urban communities, wildlife habitat, and house cherished forests that are generations old. They also underpin a \$1.2 trillion outdoor recreation economy that sustains over 5 million jobs and strengthens thousands of rural and gateway communities. Wholesale removal of these protections in such a sweeping manner would irreversibly alter these landscapes, undermining the long-term viability of businesses that depend on predictable, well-managed access to public lands.

As noted above, we strongly urge USDA and the USFS to conduct this rescission process in a manner consistent with the full procedural rigor, scientific grounding, and stakeholder engagement required under the National Environmental Policy Act and other major rule-making procedures. Given the sizable significance of the Roadless Rule, any proposal to wholly rescind or revise it must be evaluated with the same diligence as other major federal actions of comparable scope and impact.

NEPA has long established a precedent for how decisions of this magnitude should be made. For a rule change affecting over 45 million acres, the DEIS should be developed through a robust scoping process that identifies a full range of reasonable alternatives. Our community hopes that these alternatives go beyond a binary choice between fully rescinding the rule or retaining it as is. Each alternative presented should be informed by science and evaluated for its economic, social, and environmental trade-offs. We are also requesting that the Draft EIS comment period should be no less than 60 days, and extended to ensure stakeholders, including small businesses in rural areas and tribal communities, can meaningfully assess the alternatives and their potential impacts, consult with their communities, and provide substantive feedback.





A transparent and inclusive process also requires extensive public engagement beyond the opportunity to provide written comments. Our community expects the opportunity to participate in public meetings, webinars, and urges USDA to extend additional outreach to affected industries. This robust, inclusive approach for both education and gathering feedback will be essential to ensuring that stakeholder perspectives are incorporated into Final Environmental Impact Statement ("FEIS") meaningfully. The Forest Service has a long tradition of such outreach in large-scale planning efforts, and we urge the agency to honor those practices.

We are particularly concerned that rescission of the Roadless Rule would set a dangerous precedent for how longstanding national protections can be reversed without scientific evidence or broad public support. The integrity of our public lands policy depends on decisions being made deliberately, transparently, and in alignment with both the letter and spirit of NEPA. For an action with such far-reaching and permanent consequences, anything less than the suggestions we have made here would erode public trust and invite legal and economic instability. This instability will inevitably impact Americans across the country who are in some way connected to our public lands and outdoor economy.

We urge USDA to proceed with a process that maximizes stakeholder input; is grounded in the best available science; highlights the forecasted economic impacts of policy changes for individuals, businesses, and communities; and, honors the precedent that major federal actions deserve the highest level of environmental review. The economic health of rural communities, the stability of thousands of businesses, and the enduring value of our national forests depend on it.

We appreciate your attention to these comments and welcome further engagement as this process unfolds.

Sincerely,

Paul Hendricks
Executive Director
The Conservation Alliance

