The Conservation Alliance
619 12th Street
P.O. Box 160
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October 6, 2026

The Honorable Brooke Rollins
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave, SW
Washington, DC 20250

The Honorable Tom Schultz
Chief
U.S. Forest Service
201 14th St. SW
Washington, DC 20250

Joshua White
Acting Director
Ecosystem Management Coordination
201 14th St. NW
Mailstop 1108
Washington, DC 20250

Re: Comments on Docket FS-2025-0001-223869: Special Areas; Roadless Area Conservation, 91 Fed. Reg. 53,827 (Aug. 20, 2026), the associated Draft Environmental Impact Statement, and available supporting documentation

Submitted via regulations.gov and via email to Mr. Joshua White

Dear Secretary Rollins, Chief Schultz, and Director White:

The Conservation Alliance and the undersigned businesses write in strong opposition to the U.S. Department of Agriculture's (USDA) proposal to rescind the 2001 Roadless Rule. **We urge USDA to select Alternative 1, the No Action alternative** in the Draft Environmental Impact Statement (DEIS) for the final rule. As businesses whose livelihoods depend directly on the conservation of and access to America's national forests, we believe both Alternatives 2 and 3 will cause real, lasting harm to our businesses, the gateway communities we operate in, and the customers we serve.

Retaining the 2001 rule reflects a quarter-century of bipartisan, nationwide consensus that has provided businesses like ours with the regulatory certainty to invest in retail partners, guiding permits, outfitting operations, and other gateway-community infrastructure. Rescinding the rule

now would replace that stability with uncertainty about the future of the landscapes we depend on, and will undermine the consistency our business models rely on.

Inventoried Roadless Areas Provide Significant Economic Value Through Recreation

Roadless areas are foundational to our nation's powerful and growing outdoor economy. Recreation on public lands, much of it centered on backcountry experiences, anchors a $1.3 trillion national outdoor recreation economy that supports 5.2 million American jobs. National Forest System lands alone draw an estimated 159 million visits annually, generating substantial economic activity and employment for the rural and gateway communities surrounding them.[1] Opening these lands to road construction, reconstruction, industrial-scale logging, and other extraction risks disrupting income streams from recreation and tourism that gateway communities and businesses depend on and have built their operations around.[2]

The core protections the Roadless Rule offers is precisely what preserves the primitive and semi-primitive recreation experience our customers pay to access. Businesses providing goods and services to Americans partaking in human-powered recreation experiences such as backcountry hunting, packrafting, mountaineering, mountain biking, and dispersed camping depend on undeveloped terrain that allows visitors an undisturbed, remote experience. More than 25,000 miles of hiking trails, 10,000 miles of mountain biking trails, 8,000 climbing routes, and countless backcountry hunting and angling access points sit within currently protected roadless areas nationwide.[3] The Roadless Rule provides exceptional scenery, pivotal habitat for wildlife, and clean and temperate water for fish populations. Removing the rule's core protections would permanently change the character of these landscapes, eliminating the solitude our customers seek. These changes threaten to degrade the core infrastructure we rely on and potentially discourage future visitation, having a negative downstream impact on not only our businesses, but also the communities nearby.

Since the DEIS clearly anticipates additional road building, reconstruction, and increased timbering and extraction across our forests, our community believes Alternatives 2 and 3 lack adequate safeguards to prioritize landscapes, recreationists, gateway communities, and businesses for conservation and recreation. Although the proposed landscape-level land management planning proposed by the alternatives has been a long-held practice of the USFS, our community is concerned that the application of long-held precedents - including public feedback, transparency, and science - will not be prioritized at the landscape level. Without the Roadless Rule's overriding protections, local land managers could prioritize extraction and

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[1] The Pew Charitable Trusts, "An Update on the 'Roadless Rule,'" Feb. 18, 2026. https://www.pew.org/en/research-and-analysis/articles/2026/02/18/an-update-on-the-roadless-rule

[2] Outdoor News, "Trump administration moves to end roadless rule on national forests," Aug. 2026. https://www.outdoornews.com/2026/08/18/trump-administration-moves-to-end-roadless-rule-on-national-forests/

[3] Outdoor Alliance, "Defend the Roadless Rule and Protect National Forests." https://www.outdooralliance.org/roadless

development, which is an immediate threat to public lands conservation, and to our businesses and communities.

Public Sentiment Supports Retention of the Rule

The Roadless Rule has proven to be one of the most consistently popular federal land-management policies in the nation's history. Its original 2001 adoption drew roughly 1.6 million public comments (the most received for any federal rule) following more than 600 public meetings nationwide.[4,5] During the 2025 scoping period on this rescission, the agency received more than 625,000 comments, the majority in opposition to rollback - including nearly unanimous tribal feedback requesting retention of the rule.[6] A February 2026 national poll found 76% of likely voters support keeping the Roadless Rule intact.[7] To disregard overwhelming support for the rule undermines the very ideals our nation's public lands are founded upon.

The voices expressing support for the 2001 Roadless Rule represent not only a broad swathe of Americans across the country, but also customers, employees, and audiences of outdoor businesses like ours. We believe it is our responsibility to represent the interests and desires of our community to retain this rule in its entirety.

Capacity Concerns Around Agency's Preferred Alternative

We are also concerned about the Forest Service's capacity to responsibly implement the post-rescission planning outlined in the DEIS, and specifically whether the agency can complete place-based management planning in a timely manner. The agency has lost approximately 16% of its permanent workforce, nearly 5,860 employees, through reductions in force, deferred resignations, and early retirements since January 2025, and a proposed FY 2027 budget would cut Forest Service discretionary funding by roughly 75%.[8] Rolling back the rule across more than 40 million acres of national forests at once, especially alongside several other disruptive regulatory and agency-level changes underway, will likely make it difficult to manage our forests with care for conservation and recreation in the coming months and years.

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[4] GearJunkie, "Speak Up Now: USDA Moves to Repeal the Roadless Rule Across 44.7 Million Acres". https://gearjunkie.com/parks-and-public-lands/usda-moves-to-repeal-roadless-rule-44-7-million-acres
[5] Roadless.org, "Defend the Roadless Rule — Protect America's Last Wild Forests". https://roadless.org/
[6] Sierra Club, "MEDIA ADVISORY: Sources and new resources available in advance of fed statement on bulldozing public lands for roads," April 2026. https://www.sierraclub.org/press-releases/2026/04/media-advisory-sources-and-new-resources-available-advance-fed-statement
[7] Defenders of Wildlife, "Trump Administration Advances Roadless Rule Repeal at the Expense of Wildlife, Clean Water and Public Will," press release, Aug. 2026. https://defenders.org/newsroom/trump-administration-advances-roadless-rule-repeal-expense-of-wildlife-clean-water-and
[8] The Wilderness Society, "As admin claws at national forests, what will become of the Forest Service?" June 2026. https://www.wilderness.org/articles/blog/admin-claws-national-forests-what-will-become-forest-service

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Given the economic, recreational, and procedural concerns we have outlined above, **TCA and the businesses signed on to this letter respectfully urge USDA to select Alternative 1, the No Action alternative and retain the 2001 Roadless Rule in its entirety.** Outdoor businesses, gateway communities, and recreationists have built livelihoods and traditions around the durability of this protection across millions of acres of forests. We ask the agency to respect the overwhelming wishes of the public and prioritize long-term economic stability for businesses and communities: retain the rule.

Thank you for considering our comments.

Respectfully submitted,



Paul Hendricks
Executive Director
The Conservation Alliance

Submitted in partnership with the undersigned businesses and organizations:

49th State Brewing
Anchorage, AK

Adventure Labworks
Lakewood, CO

Adventure Travel Conservation Fund
Mukilteo, WA

AdventureKEEN Publishing
Birmingham, AL

Alpacka Raft
Mancos, CO

Altra
Denver, CO

American Fly Fishing Trade Association
Kalispell, MT

American Outdoor Products, dba Backpacker's Pantry
Boulder, CO

Andrea Doss Photo
Hamilton, OH

B.COLECTIVE LLC
Hood River, OR

Backbone Media
Carbondale, CO

BearVault
Superior, CO

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Bedrock Sandals
Missoula, MT

Belinda Sanda Sales
Redding, CA

Bergreen Photography
Evergreen, CO

Better Trail
Boulder, CO

Big Agnes
Steamboat Springs, CO

Black Diamond Equipment
Salt Lake City, UT

BOCO Gear
Boulder, CO

Bonfire Collective
Golden, CO

Bronwen Jewelry LLC
Bend, OR

Brooks Running
Seattle, WA

Broudy/Donohue Photography
Richmond, VT

California Outdoor Recreation Partnership
Oakland, CA

Chaco Footwear
Rockford, MI

Cheeky Fishing
North Adams, MA

Civic Shout
Lewes, DE

Cocona Labs
Boulder, CO

Compose[d]
New York, NY

Cotopaxi
Salt Lake City, UT

Crazy Creek Products
Red Lodge, MT

Day Fire Company
Redstone, CO

Devils Foot Beverage Company
Asheville, NC

Dr. Bronner's
Vista, CA

Dragonfly Marketing Solutions
Niwot, CO

Eagle Creek
Steamboat Springs, CO

Earthwell
Seattle, WA

Emerger Strategies
Charleston, SC

Eventus
Santa Rosa, CA

Exact Change
Sacramento, CA

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FishHound Expeditions LLC
Willow, AK

Fjällräven
Louisville, CO

Flickr
San Francisco, CA

Gossamer Gear Inc.
Austin, TX

GRAYL
Seattle, WA

Gregory Mountain Products
Salt Lake City, UT

GU Energy Labs
Berkeley, CA

HEST
Seattle, WA

High Mountain Creative
Missoula, MT

Kahtoola
Flagstaff, AZ

Kaley Alie Art
Fort Collins, CO

Klean Kanteen
Chico,CA

Kula Cloth
Snohomish, WA

Last Exit Goods
Littleton, CO

L.L. Bean
Freeport, ME

LyteYear
Ouray, CO

Mercantile Commerce LLC
Seattle, WA

Merrell
Rockford, MI

Mountain Sports Flagstaff
Flagstaff, AZ

NEMO Equipment
Dover, NH

Nite Ize
Boulder, CO

NRS
Moscow, ID

O.A.R.S. Companies, Inc.
Angels Camp, CA

Oberalp North America
Boulder, CO

Oboz Footwear
Bozeman, MT

Oregon Pack Works
Bend, OR

Orvis
Sunderland, VT

Osprey Packs
Cortez, CO

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Outdoor Eats
Tacoma, WA

Outdoor Prolink
Boulder, CO

Outside In
Bend, OR

Pack Rat Outdoor Center
Fayetteville, AR

PACT Outdoors, Inc.
Gunnison, CO

Patagonia
Ventura, CA

Peak Design
San Francisco, CA

Performance Apparel, LLC - Hot Chillys & Polarmax
Southern Pines, NC

Port Side
Bellingham, WA

Premiums for the Planet
Snowmass Village, CO

Puddle Creative
Portland, OR

Ranchman Roasters
Omaha, NE

RecPak
Driggs, ID

REECE DESIGN INC.
Boulder, CO

REI Co-op
Sumner, WA

RepYourWater
North Adams, MA

Revolution House Media
Big Sky, MT

Ridge Merino
Mammoth Lakes, CA

Roads Rivers and Trails
Milford, OH

Royal Robbins
Berkeley, CA

Rustek
Portland, OR

rygr
Carbondale, CO

Salida Mountain Sports
Salida, CO

Sanitas Sales Group
Denver, CO

SCARPA North America
Boulder, CO

Shār Snacks
Austin, TX

Smartwool
Denver, CO

Smeeny Made Wild
Steamboat Springs, CO

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SmugMug
San Francisco, CA

Studio Malt
Chicago, IL

Sven-Saw
Duluth, MN

Tailwind Nutrition
Durango, CO

Tellus Outdoor
Fort Collins, CO

The Forest Group
Lotus, CA

The Parks Podcast
Glen Allen, VA

Toad&Co
Santa Barbara, CA

Topo Athletic
Framingham, MA

TripOutside
Durango, CO

Utu Co.
Los Angeles, CA

Verde Brand Communications
Durango, CO

Wild Idea Media
Kalispell, MT

Wilderdog
Sacramento, CA

Wyld
Clackamas, OR

Yellow Dog Flyfishing
Bozeman, MT

Yogo
Las Vegas, NV