



October 2, 2026

Brad Kinder, Acting Director
Ecosystem Management Coordination
U.S. Forest Service
U.S. Department of Agriculture
201 14th Street SW, Mailstop 1108,
Washington, DC 20250-1124.

RE: Special Areas; Roadless Area Conservation - Proposed Rescission of the 2001 Roadless Area Conservation Rule; [RIN 0596-AD66](#); Docket No. FS-2025-0001

Dear Acting Director Kinder,

Megafire Action is a non-profit organization committed to ending the megafire crisis through a holistic approach to land management, wildfire response, and community resilience, grounded in science. **We write in opposition to the U.S. Department of Agriculture's (USDA) proposal to rescind the 2001 Roadless Area Conservation Rule (Roadless Rule or the Rule).**

USDA argues that repeal of the Roadless Rule is necessary for active forest management to respond to changing and localized conditions, such as increasing wildfire risk. However, USDA's Draft Environmental Impact Statement (DEIS) provides no evidence to support this claim. Instead, the DEIS presents ample data and research demonstrating that:

- The Roadless Rule already includes exceptions that allow local decisionmakers to authorize roads and timber harvest in Inventory Roadless Areas (IRAs) for the purposes of reducing wildfire risk.
- Hazardous fuels reduction work has already been completed on millions of acres of IRAs at a pace and scale that is similar to other forest service lands.
- Wildfire risk is already lower in IRAs compared to other lands.
- Repeal of the Roadless Rule is expected to increase wildfire ignitions in IRAs.

The DEIS demonstrates that the Forest Service already can and does complete wildfire risk mitigation activities in roadless areas at rates comparable to other lands and presents strong evidence that repeal of the Roadless Rule will increase wildfire risk in roadless areas. While a nuanced and targeted conversation about road construction and wildfire resilience is warranted, the proposed wholesale rescission of the 2001 Roadless Area Conservation Rule swipes away any nuanced discussion. **Megafire Action opposes the USDA's proposal to rescind the Roadless Rule because it will not help solve the megafire crisis.**

The Roadless Rule Does Not Hinder Effective Wildfire Management

USDA argues that the Roadless Rule needs to be rescinded because it adversely limits local management discretion to carry out needed wildfire fuels reduction treatments. However, USDA's Draft Environmental Impact Statement (DEIS) clearly states that the "2001 Roadless Rule does not prohibit and has not entirely prevented hazardous fuels reduction in IRAs."¹ The DEIS provides no evidence that the Roadless Rule is disproportionately hindering wildfire management activities in IRAs compared to other federal lands. Instead, multiple lines of evidence reviewed by the DEIS, including new data analyses and peer-reviewed science produced by the Forest Service, find that effective wildfire risk reduction is already being achieved in roadless areas.

Roads and timber harvest are already allowed to reduce wildfire risk

The USDA argues that rescinding the Roadless Rule is necessary to "return land management decisionmaking for inventoried roadless areas to local Forest Service officials."² However, as clearly articulated in the DEIS, the Roadless Rule imposes no prohibitions on the use of prescribed fire and already empowers regional land managers to take other necessary wildfire prevention and mitigation actions through the use of special exemptions. Under the Rule's exemptions, road construction is allowed in IRAs when "needed to protect health and safety in cases of imminent danger, such as wildfire" and timber harvest is allowed to "restore ecosystem structure and function, such as reducing the likelihood of uncharacteristic wildfire."³

The Rule also recognizes the need for local and regional expertise. As stated in the DEIS, in 2018 the rule expanded all exception authorities to regional foresters. These exemptions allow local decisionmakers to carefully design and balance urgent management needs with the long-term conservation of roadless areas. The Rule allows for efficient, effective, and tailored management across our national forest system (NFS) lands.

Roadless areas are already being actively managed for wildfire risk

Despite limited and inconsistent record keeping by the federal government on the use of Roadless Rule exceptions, the DEIS is still able to demonstrate that local forest managers are successfully using the Roadless Rule exceptions to actively manage

¹ DEIS pg 94. USDA Forest Service. (August 2026). *2001 Roadless Area Conservation Rule Rescission Draft Environmental Impact Statement*. (ELMS Project #302690).

<https://www.fs.usda.gov/managing-land/planning/roadless>.

² Federal Register (Aug 20, 2026). Vol.91, No. 160. pg 53828, <https://www.regulations.gov/document/FS-2025-0001-223869>.

³ <https://www.congress.gov/crs-product/R46504>.

millions of acres in IRAs to reduce wildfire risk. The DEIS reports that “an average of 500 acres per year of timber harvest and a total of 1.8 million acres of hazardous fuels reduction with IRAs” have been completed under the Roadless Rule.⁴

The DEIS provides no evidence that the Roadless Rule has been limiting the ability of forest managers to meet wildfire risk reduction goals in roadless areas relative to other areas. Instead, the DEIS finds that “the 2001 Roadless Rule did not meaningfully constrain hazardous fuel treatment activities when considering the number and area of treatments as a share of total forested land (Healey 2020).”⁵ The DEIS also cites Woosley et al. (2024), which finds that the Forest Service can meet its Wildfire Crisis Strategy objective of treating more than 20% of acres in the 21 priority landscapes even when assuming no acres treated in roadless areas.⁶ Since millions of acres *have been* treated in IRAs, the available research demonstrates that IRAs are already contributing to meeting the Forest Service’s wildfire strategy goals.

Treatments in roadless areas are already proving to be effective

In 2019, the Eldorado National Forest treated 8,800 acres of the Caples Creek Roadless Area with prescribed fire. When the 2021 Caldor Fire burned more than 220,000 acres toward South Lake Tahoe, the Sierra Nevada Conservancy’s assessment found the Caples Creek treatment was “a rare place in the wildland where the fire slowed down and changed course,” helping stop the fire’s advance short of the community.⁷

In 2014, fuel treatments across 170 acres within the Mission Mountains IRA were part of a larger prescribed burning project throughout a Montana wilderness area. These treated acres were critical barriers that helped contain the spread of both the 2015 Cedar Peak Fire and the 2016 Piper Fire.⁸

Wildfire risk is already lower in roadless areas

The Roadless Rule has essentially created a two decade natural experiment in which we can compare the impacts of Roadless Rule regulations on wildfire outcomes between IRA and other NFS lands not subjected to the Rule.⁹ If the Roadless Rule was a meaningful barrier to addressing the wildfire crisis, then the 58.2 million acres of IRA would have collectively experienced proportionately more catastrophic wildfires since

⁴ DEIS pg 7.

⁵ DEIS pg 96.

⁶ Woolsey et al. (2024). “Constraints on Mechanical Fuel Reduction Treatments in United States Forest Service Wildfire Crisis Strategy Priority Landscapes.” *Journal of Forestry* 122 (4): 335–51. <https://doi.org/10.1093/jofore/fvae012>.

⁷ <https://calmatters.org/environment/wildfires/2026/08/trump-california-forests-logging-roads/>.

⁸ Boerigter, et al. (2024). Untrammeling the wilderness: restoring natural conditions through the return of human-ignited fire. *fire ecol* 20, 76. <https://doi.org/10.1186/s42408-024-00297-5>.

⁹ Other non-IRA NFS lands refer to federal lands that are not designated roadless or wilderness.

2001 than the 135 million acres of non-IRA that have not been subject to the rule. The DEIS presents *no evidence* that this has been the case and instead demonstrates that wildfire risk is actually lower in IRAs than non-IRAs.

Wildfire occurrence is already lower in roadless areas

Inventoried roadless areas already enjoy a lower rate of wildfire occurrence than other NFS lands not subjected to Roadless Rule. As stated in the DEIS, “past research and new analyses presented here indicate that more fires, both in absolute numbers and density, originate on other NFS lands compared to IRAs and wilderness areas” and that the “proportion of human-caused fires in IRAs and wilderness is less than half that on other NFS lands.”¹⁰ The DEIS’s own review of two federal wildfire databases, the InFORM Fire Occurrence Date Record (FODR) and the Monitoring Trends in Burn Severity (MTBS), finds that IRAs have experienced a lower ignition density and a lower percentage of area burned compared to other NFS lands.¹¹

The DEIS does report that wildfires in IRAs tend to be larger in size¹² and initial attack success rate tends to be slightly lower compared to other NFS lands.¹³ However, the DEIS goes on to explain that these statistics do not necessarily indicate that wildfires are worse in IRAs since they do not account for known differences in fire management objectives and strategies among different land designation, “management strategies other than complete suppression are more likely to be employed in IRAs and wilderness areas because land management plans emphasize ecological objectives and because critical resources and assets that can be harmed by fires are relatively limited.”¹⁴

Wildfires in roadless areas are not more destructive.

The DEIS presents no evidence that wildfires in IRAs have been relatively more destructive than wildfires in other NFS lands. The DEIS’s own analyses and review of the scientific literature finds that there is little to no significant difference in burn severity between IRA and other NFS lands.¹⁵ Additionally, the DEIS includes no review of the relative impact of IRA and non-IRA wildfires on community outcomes such as structure losses.

A rescission will likely increase ignitions in IRAs

¹⁰ See DEIS pg 85-86.

¹¹ See DEIS Tables 18-19 on pg 87.

¹² DEIS Table 18, pg 87.

¹³ DEIS Table 24, pg 97.

¹⁴ DEIS pg 97.

¹⁵ DEIS Table 19 and the review of Healey (2020) and Johnston et al. (2021) on pg 89.



Rescinding the Roadless Rule and expanding road access in IRAs will likely increase the ignition density and with it the risk of catastrophic wildfire. As the DEIS notes, “ignition density is approximately four times greater on other NFS lands compared to the potentially affected IRAs and wilderness. Most of this difference is due to the greater density of human-caused ignitions within other NFS lands.”¹⁶ Roads increase the accessibility of human activity in forests, and the opportunity for human-caused wildfire ignition. Aplet et al (2026) found that wildfire-ignition density in IRAs (1.97 fires per 1,000 ha) was much lower than lands within 50 meters of a road (7.99 fires per 1,000 ha).¹⁷ Furthermore, human caused-wildfires have a higher risk of destructive outcomes. Of the deadliest and most destructive wildfires in California between 2012 to 2022, 90% were human-caused and ignited within 1 km from the Wildland Urban Interface (WUI).¹⁸ Higuera et al. (2023) found that from 1999 to 2020 an estimated 76 percent of structures lost in the western US were the result of human-caused fires.¹⁹ The DEIS presents no evidence to suggest that potential suppression benefits of additional roads would outweigh the increase in wildfire ignition risk.

Rescinding the Roadless Rule won’t help solve the megafire crisis

There has been more than 20 years of forest monitoring data under the Roadless Rule and the DEIS presents *no evidence* to support the argument that eliminating the designation will improve wildfire resilience. The Roadless Rule has neither prevented fuel treatments nor led to substantially more destructive wildfire in IRAs compared to other NFS lands. **In the absence of any compelling argument or evidence that the Roadless Rule has made the wildfire crisis worse in inventoried roadless areas, Megafire Action strongly opposes the USDA’s proposal to rescind the Roadless Rule.**

Do not hesitate to reach out to Megafire Action’s Director of Federal Affairs, James Campbell (James@megafire.org) for further information.

Sincerely,

Matt Weiner
Founder and CEO of Megafire Action

¹⁶ DEIS pg 89.

¹⁷ Aplet et al. (2026) Three-decade record of contiguous-U.S. national forest wildfires indicates increased density of ignitions near roads. *fire ecol* 22, 8. <https://doi.org/10.1186/s42408-026-00450-2>.

¹⁸ Kumar et al. (2025). Compounding effects of climate change and WUI expansion quadruple the likelihood of extreme-impact wildfires in California. *npj Nat. Hazards* 2, 17. <https://doi.org/10.1038/s44304-025-00067-6>.

¹⁹ Higuera et al (2023). Shifting social-ecological fire regimes explain increasing structure loss from Western wildfires, PNAS Nexus, Vol 2, Issue 3. <https://doi.org/10.1093/pnasnexus/pgad005>.