



Wyoming County Commissioners Association

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October 6, 2026

Joshua White, Acting Director, Ecosystem Management Coordination
Forest Service, United States Department of Agriculture
201 14th Street, SW
Mailstop 1108
Washington, DC 20250-1124

Submitted via Federal eRulemaking Portal.

Re: Proposed Rule and Draft Environmental Impact Statement for Rescission of the Roadless Area Conservation Rule

Dear Acting Director White,

On behalf of the Wyoming County Commissioners Association (WCCA), an organization representing the boards of county commissioners for all twenty-three of Wyoming's counties, please accept the following comments on the United States Department of Agriculture, United States Forest Service (USFS or Forest Service) Proposed Rule and Draft Environmental Impact Statement (DEIS) concerning rescission of the 2001 Roadless Area Conservation Rule (RACR or Rule).

The WCCA supports rescission of the RACR because decisions about where roadless characteristics should be protected, and how those lands should be managed, are best made through forest-level planning using current information, best available scientific information, meaningful state and local government coordination, and public participation. The WCCA does not dispute that unroaded landscapes can provide important ecological, recreational, and social values, or that those values may warrant strong protection. Our concern is that those determinations should not continue to be governed by a national rule built on legacy inventories and static boundaries that did not and do not fully reflect conditions on the ground. Rescission would return those roadless management decisions to the planning processes designed to evaluate current landscape conditions, multiple-use needs, and the particular values present on each national forest.

In Wyoming, counties serve as a legal arm of the state entrusted with carrying out statutory and regulatory responsibilities at the local level. Those responsibilities include wildfire preparedness, emergency response, public safety, and protection of local infrastructure. County governments are also actively engaged in National Environmental Policy Act (NEPA) processes to help our federal partners create, revise, and amend management plans that promote "productive and

enjoyable harmony between man and his environment.” 42 U.S.C. § 4321. Wyoming counties take these responsibilities seriously and work to ensure our communities remain economically vibrant, safe, and healthy places to live, work, and recreate. Wyo. Stat. § 18-5-208(b).

Well-managed national forests are integral to those objectives. As co-regulators and cooperating partners, Wyoming counties have adopted comprehensive land use and natural resource plans that provide the basis for coordination with federal agencies on matters including water, timber, grazing, wildlife habitat, recreation, ecosystem services, economic development, and the conservation of undeveloped and roadless characteristics where those values are present and appropriate to protect. Forest Service decisions can directly affect these resources and values, as well as the customs, culture, and socioeconomic conditions of our communities, making meaningful county participation in forest planning particularly important.

I. Executive Summary

WCCA believes management decisions for Wyoming’s national forests are best made as close to the ground as possible, in coordination and cooperation with state and local governments. The National Forest Management Act (NFMA) and the Forest Service Planning Rules provide a framework for forest-level planning that accounts for ecological, economic, and social conditions while emphasizing coordination with state and local governments. That framework allows management direction to be tailored to the conditions and needs of individual forests and communities. The 2012 Planning Rule also requires the agency to apply the best available scientific information in the planning process (*see* C.F.R. § 219.3), ensuring that management decisions can reflect current science, data, and conditions on the ground.

At the time, the RACR did not use best available science. During development of the Rule, the Forest Service relied on twenty-five-year-old maps and declined to engage state and local governments as cooperating agencies under NEPA, limiting the extent to which the Rule could incorporate their data, expertise, and knowledge of local conditions. The administrative record reflects that the Forest Service had access to better information during its rulemaking but knowingly did not use that information in preparation of the maps designating IRA.¹

The consequences of the Forest Service’s deficient process extend well beyond the rulemaking itself. The RACR gave those legacy inventories continuing regulatory effect by applying its prohibitions to “all lands within an inventoried roadless area [IRA] boundary,” even where the inventories did not accurately reflect conditions on the ground. Those boundaries included thousands of miles of roads and substantial areas with a history of active forest management, yet

¹ *Wyoming v. U.S. Department of Agriculture*, 277 F. Supp. 2d 1197, 1207 (D. Wyo. 2003) (“the Forest Service also acknowledged that these maps did not contain the best data available, even though it had access to better data for the maps”) (citing Administrative Record, Doc. 2610).

they were elevated over the forest-level planning process that would otherwise allow management discretion to respond to current information and local conditions. Although the Rule provides limited means to make technical corrections to IRA boundaries, the Forest Service has made no comprehensive effort during the past twenty-five years to update incorrect boundaries to reflect historical on-the-ground realities.

After more than two decades of RACR implementation, the practical consequences of relying on static legacy inventories are increasingly apparent. Because the Rule attaches national prohibitions, inaccuracies in mapped boundaries translate directly into management constraints on the ground, even where those boundaries fail to reflect the character, development history, or present condition of the lands they encompass. Forest-level planning is better equipped to evaluate changing conditions and to work with state and local governments to address contemporary risks, opportunities, and management needs through forest plans and project-level decisions. The RACR, by design, displaced a measure of that forest-specific decision-making with nationally imposed prohibitions tied to legacy boundaries.

WCCA's support for Alternative 2 is not based on a belief that roads should be constructed or timber harvested throughout Wyoming's roadless areas. Rather, it is based on the principle that forest managers, working with state and local governments through an open public process, should have the authority to determine how particular areas are best managed toward desired conditions considering the ecological, social, and economic conditions of individual forests and communities.

Wyoming's counties have distinct histories, values, landscapes, and forest conditions, and those differences are appropriately reflected through forest-level planning. Counties remain committed to working with the Forest Service to identify and protect areas where roadless character and related resource values warrant protection. Rescission of the RACR does not diminish that commitment; it restores those determinations to a forest-level planning process capable of considering current information, local priorities, multiple-use needs, intergovernmental coordination, and robust public input.

II. Background

Wyoming is home to the nation's first national forest, the Shoshone, and portions or the entirety of seven other national forests: the Ashley, Bighorn, Black Hills, Bridger-Teton, Caribou-Targhee, Medicine Bow-Routt, and Uinta-Wasatch-Cache National Forests. National forest lands in Wyoming encompass more than 9.2 million acres—an area larger than New Jersey, Connecticut, and Delaware combined.

Beyond their scenic landscapes, Wyoming's national forests provide a broad range of resources and public benefits, including clean water, timber, grazing, mineral and energy resources, recreation, wildlife habitat, and ecosystem services. They are also important contributors to

Wyoming's economy and to communities throughout the state. A 2023 study conducted by The Nature Conservancy and the Wyoming State Forestry Division estimated that Wyoming's forests provide approximately \$26 billion in economic value each year (TNC, 2023).

Of the approximately 44.7 million acres of IRAs subject to the RACR, approximately 3.2 million acres are located within national forests in Wyoming. Many of these areas trace their inventory history to the RARE II process of the 1970s, which evaluated roadless lands for potential inclusion in the National Wilderness Preservation System. Congress later addressed Wilderness designation in Wyoming through the Wyoming Wilderness Act of 1984, after which lands not designated as Wilderness would be managed under applicable forest plans. The RACR subsequently imposed nationwide restrictions on areas identified through RARE II, placing national regulatory constraints over lands that had otherwise been subject to forest-level management.

The resulting RACR boundaries encompass lands with widely varying histories, physical characteristics, and management needs. Some retain significant roadless character and associated resource values; others contain existing roads, public campgrounds, evidence of prior management, or conditions that have changed substantially since the underlying inventories were developed. These differences are particularly important in Wyoming, where RACR restrictions affect decisions involving forest health, fuels and wildfire risk, insect and disease response, access to state and private lands, grazing infrastructure, and other management activities. The sections that follow discuss those effects in greater detail.

Wyoming has challenged the RACR through litigation while also attempting to address its practical shortcomings through collaborative, locally informed processes. Under Governor Matt Mead, the State advanced an initiative to establish local collaborative working groups to review and assess roadless areas, recommend management actions, and consider potential designations or releases where appropriate. That effort produced specific recommendations for roadless areas on the Bighorn National Forest and was supported through the Bighorn Forest Roadless Collaborative. Together, these efforts demonstrate Wyoming's longstanding concern with the RACR as well as its willingness to work constructively with the Forest Service to reconcile roadless management with conditions on the ground. They also illustrate the difficulty of correcting or adapting legacy inventories once they have been embedded in a national regulatory framework.

Wyoming counties are committed to assisting the Forest Service in managing the national forest lands within and affecting their jurisdictions. That commitment is reflected in active county participation in project development, forest-plan revision, implementation, and monitoring. Wyoming counties currently serve as cooperating agencies in several NEPA processes, including forest-plan revisions, and participate in collaboratives and working groups throughout the state. This fall, Wyoming counties are also hosting a forestry symposium intended to equip

cooperating agencies and Forest Service personnel with the tools, relationships, and opportunities necessary to address changes in agency organization, wildfire risk, ecological conditions, and forest management.

WCCA and Wyoming county commissioners have also worked collaboratively with the Forest Service to develop *County Governments and the USDA Forest Service: A Guidebook for Working Together*. A former WCCA president and Sublette County Commissioner authored the foreword on behalf of the National Association of Counties (NACo), observing that “County officials are committed to hold productive dialogues with agency staff to ensure access, improve public lands, and foster a strong relationship between Federal and local officials from now into the future.” WCCA remains committed to that pledge and to the cooperative principles reflected throughout the Guidebook. One meaningful opportunity to renew and institutionalize that commitment would be to update and republish a cooperative manual reflecting current authorities, practices, and opportunities for local-federal coordination. WCCA stands ready to assist the Forest Service in that effort.

III. Distinguishing Roadless Values from the Roadless Rule

The debate over rescission of the RACR is too often framed as a choice between protecting roadless landscapes and allowing development. WCCA instead distinguishes the values of particular landscapes such as wildlife habitat, watershed protection, recreation, scenic quality, and carbon storage from the regulatory status assigned by an IRA boundary. The relevant policy question is whether those values are best identified and protected by continued application of the RACR or through forest-level planning and site-specific decision-making.

Those resource values are attributes of particular landscapes; they are not synonymous with IRA status. Designation as an inventoried roadless area should not itself be treated as proof that a landscape is pristine, undisturbed, uniformly roadless, or necessarily deserving of identical management. RACR boundaries include existing roads, infrastructure, prior timber harvest, and other evidence of disturbance, and conditions within those boundaries have continued to change during the twenty-five years since the Rule was adopted.

Continued reliance on those legacy boundaries risks conflating the inventory with the resource values it was intended to help protect. The appropriate question is what values actually exist on the ground, what threats or management needs affect them, and what management direction is necessary to conserve them. In some places, conserving roadless-associated values may appropriately mean maintaining an undeveloped condition and limiting future access. In others, protecting those same values may require active management, including vegetation treatment, fuels reduction, habitat restoration, or temporary access needed to accomplish that work.

Protecting important unroaded landscapes and rescinding the RACR are therefore not mutually exclusive. Rescission changes the framework within which those decisions are made; it does not

predetermine their outcome. The question is not whether roadless values matter, but how and at what scale those values are best identified, balanced, and protected.

IV. WCCA Position

The WCCA supports Alternative 2.

WCCA appreciates the Forest Service's thorough analysis in the DEIS. As discussed in our detailed comments below, however, we believe the DEIS in some instances overstates the benefits of Alternative 1 and understates the benefits of Alternative 2. We also recognize the inherent limitations of analyzing, through a single national rulemaking, the conditions and management needs of millions of acres across dozens of national forests. Those limitations reinforce one of the principal reasons WCCA supports Alternative 2: these decisions are better made through forest-level planning.

WCCA does not support Alternative 1 because it perpetuates reliance on obsolete inventories, continues to allow those inventories to override forest-plan direction, and preserves boundaries that the Forest Service has not comprehensively updated during the past twenty-five years.

Alternative 3 represents a substantial improvement over Alternative 1. It updates the roadless inventory to exclude certain roaded areas and lands within the wildland-urban interface and adds proposed § 294.14(g), which would expressly authorize modifications and administrative corrections to IRA boundaries. In Wyoming, the updated inventory would reduce inventoried roadless acreage from approximately 3.24 million acres to approximately 1.15 million acres. WCCA also believes the inclusion of Alternative 3 provides a meaningful middle-ground alternative for purposes of the DEIS's reasonable-range-of-alternatives analysis.

Nevertheless, Alternative 3 retains the fundamental premise that a national roadless rule should supersede management determinations made through the land management planning process for individual national forests. WCCA disagrees with that premise. The 2012 Planning Rule generally places responsibility for unit-level land management planning with the Forest Supervisor, reflecting the Forest Service's recognition that those officials are closest to the resources, issues, communities, and interested parties associated with the individual planning unit. WCCA believes that rationale applies equally to decisions concerning lands possessing roadless characteristics. Those lands should be evaluated as part of the same integrated forest-planning process used to balance ecological, economic, social, and multiple-use considerations across the rest of the national forest.

Alternative 2 is the only alternative that returns these management decisions to the appropriate level within the Forest Service: the forest-level planning process. Rescission of the RACR would not itself amend a forest plan, authorize construction of a road, or approve timber harvest. Those decisions would continue to be governed by applicable forest-plan direction and, where

necessary, subsequent planning and project-level analysis. Indeed, when the RACR was adopted, approximately 24.2 million of the 58.5 million acres of IRAs (about 41 percent) were already allocated under forest plans to prescriptions that prohibited road construction or reconstruction. The existence of those protections demonstrates that roadless values can be, and historically have been, addressed through forest planning independent of the RACR.

Any future change to forest-plan management area allocations or other plan components would likewise occur through the applicable amendment or revision process, with the participation of state and local governments and opportunities for public review and comment. A separate national prohibition can also interfere with the Forest Service's ability to integrate roadless considerations with other plan components addressing forest health, wildlife habitat, watershed protection, recreation, access, and multiple-use objectives. WCCA sees no reason why decisions concerning roadless character should be isolated from that broader planning responsibility through a separate national prohibition.

A. Roadless Values are Best Addressed through Forest-level Planning

IRAs in Wyoming's national forests are currently allocated to a multitude of management areas in their applicable forest plans. Some portions are allocated to Forest Products, primarily in areas that have roads and a history of forest management. Other portions are allocated to Backcountry Recreation, Non-Motorized Recreation, Semi-primitive Motorized Recreation, Backcountry, Recommended Wilderness, Research Natural Areas, Plant and Wildlife Habitat, Dispersed Recreation, Deer and Elk Winter Range, Forested Flora and Fauna, Special Wildlife Area, Aspen Maintenance and Enhancement, and other management areas. Rescission of the RACR would not eliminate or alter those allocations. Allocations will remain in effect unless and until the applicable forest plan is amended or revised through the NFMA planning process.

The 2012 Planning Rule provides a meaningful framework for identifying and protecting the particular values associated with unroaded lands. The Planning Rule defines a desired condition as "a description of specific social, economic, and/or ecological characteristics of the plan area, or a portion of the plan area, toward which management of the land and resources should be directed." 36 C.F.R. § 219.7(e)(1)(i). Desired conditions therefore focus management on the condition the Forest Service is seeking to maintain or achieve, rather than treating the presence or absence of a particular use or infrastructure as an end in itself.

Where undeveloped character, remote recreation, wildlife habitat, watershed integrity, scenic quality, solitude, or limited motorized access are important, those characteristics can be affirmatively identified through desired conditions and reinforced through standards, guidelines, suitability determinations, and management-area direction. That approach allows the Forest Service to identify the values that warrant protection and then determine what management is necessary to sustain them. Roads, road closures, decommissioning, vegetation management,

recreation management, and other activities become tools to be evaluated according to whether they advance or impair the desired condition of the landscape.

The RACR largely approaches roadless character through a categorical restriction on road construction and reconstruction based on a legacy map. Forest planning, by contrast, begins with the management objective: what should this landscape look like, what values should it provide, and what conditions should be maintained or restored? That framework can protect the characteristics commonly associated with roadless areas without treating a decades-old inventory boundary as the resource value to be protected. It also preserves the flexibility necessary to respond when active management, access, restoration, or changing conditions require a different approach.

Exactly how existing IRAs will be managed following rescission will be determined through forest and project planning, considering on-the-ground characteristics, needs, and opportunities, with input from state and local governments and public review and comment. WCCA expects that restoring this flexibility will improve the Forest Service's ability to maintain and improve the health of Wyoming's national forests, reduce the risk of catastrophic fire and insect epidemics, protect municipal watersheds, improve wildlife habitat, and provide other multiple-use values, uses, and outputs. In practice, that may mean allowing temporary roads, commercial timber harvest, or other active management in some locations, while providing strong protections in others where undeveloped character, remoteness, ecological values, or similar characteristics are identified as desired conditions in the applicable forest plan. Forest planning provides the tools to make those distinctions. Rescission of the RACR therefore need not mean less protection for special places, but rather that protections are based on the values and conditions that exist on the landscape and are incorporated into the forest plans designed to manage them.

B. National Forest System Roads

Of the approximately 9,500 miles of existing roads within IRAs nationwide (DEIS, p. 23), 1,051 miles are located within national forests in Wyoming: 61 miles in the Ashley National Forest, 245 miles in the Bighorn National Forest, 5 miles in the Black Hills National Forest, 602 miles in the Bridger-Teton National Forest (including a State scenic highway and a campground), 7 miles in the Caribou-Targhee National Forest, 41 miles in the Medicine Bow National Forest, and 90 miles in the Shoshone National Forest.

Even with current mapping technologies, the Forest Service continues to rely on 50-year old, legacy maps as its basis for national policy and restrictions on forest management. The following photograph illustrates a well-established Forest Service road located within an IRA on the Bighorn National Forest. Examples such as this underscore the disconnect that can exist between legacy inventory boundaries and present conditions on the ground, and the difficulty of continuing to apply categorical roadless restrictions to areas that are demonstrably roaded.



WCCA agrees with the DEIS assumption that any new road construction in Wyoming's national forests is likely to consist primarily of short, temporary, low-standard roads within operable areas near existing roads, rather than high-standard roads open to general motor-vehicle use (DEIS, p. 102). That assumption is consistent with existing forest-plan direction in Wyoming, including plan components that generally require temporary project roads to be closed or decommissioned following project completion.

The RACR can also produce counterproductive results in road management. Because the Rule generally prohibits construction of new roads within IRAs, existing roads can acquire an artificial scarcity value. A road that is poorly located, deteriorating, or no longer necessary for its original purpose may nevertheless be retained because decommissioning it could permanently eliminate access that cannot later be restored or relocated. In that way, the RACR can discourage the very road decommissioning and restoration that roadless management is often intended to promote. Rescission would give land managers greater flexibility to evaluate roads based on current conditions and management needs, decommissioning unnecessary or environmentally problematic roads where appropriate, while preserving the ability to establish access elsewhere if future management requires it.

C. Vegetation and Forest Management

The health, resistance, and resilience of Wyoming's national forests are a primary concern for WCCA. Extensive insect outbreaks over the past quarter-century, especially landscape-scale tree

mortality on the Medicine Bow National Forest, underscores the importance of providing local Forest Service decisionmakers with practical tools to respond to changing forest conditions. Table 14 (DEIS p. 67) does not provide sufficient Wyoming-specific information to determine the proportion of national forest lands at risk of tree mortality, either within or outside IRAs. In some instances, the RACR has limited the Forest Service's ability to respond to insect epidemics. There are substantial benefits to preserving sufficient flexibility for local Forest Service officials to respond to future outbreaks and changing forest conditions.

As discussed on page 73 of the DEIS, Alternative 2 would not compel or authorize site-specific timber harvest. Any future harvest would remain subject to applicable forest-plan direction, project-level NEPA analysis where required, coordination with state and local governments, and opportunities for public review and comment.

The portions of Wyoming's IRAs most likely to experience future vegetation management are also likely to be those that already contain roads, are located near existing roads, or otherwise show evidence of prior management. Many of these lands fall within the approximately 2.1 million acres that Alternative 3 would remove from IRAs in Wyoming. Because of their proximity to existing access, vegetation management in many of these areas could occur without construction of new permanent roads.

Considering tree species, timber values and volumes, haul distances, terrain, and logging capability, timber harvest within Wyoming IRAs would also likely be concentrated in areas classified by the DEIS as "likely operable." Figures 10 and 11 (DEIS, p. 76–77) do not provide sufficient Wyoming-specific information to estimate potential harvest acreage or volume, but the national totals include substantial acreage within IRAs that is already roaded.

The broader land-allocation context is also important. The four national forests located entirely within Wyoming encompass approximately 8.0 million acres, of which only 912,440 acres (about 11 percent) are identified as suited timberlands where timber production may occur (Table 1). By comparison, Wyoming's national forests contain approximately 3,068,689 acres of Congressionally designated Wilderness. Rescission of the RACR therefore would not transform Wyoming's national forests into landscapes broadly available for timber production; substantial acreage would remain unavailable or unsuitable for timber harvest under existing statutory and forest-plan direction.

Table 1. Total Forest Acreage and Suitable Timber in Wyoming National Forests

Forest	Total Acres	Suited Timber Acres	Percent Suited Timber
Bighorn	1,107,670	185,277	17%
Bridger Teton	3,402,644	279,400	8%
Medicine Bow	1,093,618	320,754	29%
Shoshone	2,433,125	127,009	5%
Total:	8,037,057	912,440	11%

Concerns regarding carbon storage, mature forests, old-growth characteristics, and other ecological values are also important considerations in vegetation management. Those values are attributes of particular landscapes and are not synonymous with IRA status. Where particular stands or landscapes warrant protection because of age, forest condition, ecological function, carbon value, or other characteristics, those resources can and should be identified and addressed directly through forest planning and project-level analysis. Reliance on the RACR as a proxy for those values is particularly problematic where inventoried boundaries do not accurately reflect present conditions.

The available science also cautions against assuming that broadly restricting management is necessarily the most effective means of maintaining or achieving certain ecological conditions. The Forest Service and Bureau of Land Management’s 2024 *Mature and Old-Growth Forests: Analysis of Threats on Lands Managed by the Forest Service and Bureau of Land Management* identifies wildfire as the leading current threat to mature and old-growth forests, followed by insects and disease, while tree cutting represents a comparatively minor source of loss (p. 1). The report’s observed trends reinforce the distinction. On page 58, the agencies report that over the nine-year period examined, “[o]ld-growth forests in reserved areas (Wilderness, Roadless Areas, National Monuments) declined by 0.4 percent,” while old growth outside reserved areas “increased by 7.8 percent, with minor impacts from disturbances outweighed by the increases.”

The data does not establish active management as the sole cause of the increase outside reserved areas, nor does it diminish the importance of protecting existing mature and old-growth forests. The data does, however, demonstrate that maintenance and recruitment of old-growth conditions are not dependent upon reserved status or broad restrictions on management. The agencies’ own analysis instead reinforces the importance of evaluating the actual conditions and threats affecting mature and old-growth forests and selecting management responses accordingly.

That context is particularly relevant given the limited vegetation management that has occurred within IRAs since adoption of the RACR. WCCA recommends revising the final sentence on page 61 of the DEIS to more accurately characterize that history. A more accurate statement would be: “Since the 2001 Roadless Rule, very limited vegetation management has occurred inside inventoried roadless areas.”

According to the DEIS discussion on page 69, from 2014 through 2024, timber harvest and noncommercial vegetation treatments within IRAs nationwide averaged approximately 500 acres and 1,700 acres per year, respectively. Combined, those activities affected only about 0.005 percent of the approximately 44.7 million acres of IRAs each year.

D. Fire and Fuels

Table 22 (DEIS, p. 92) identifies the acreages and percentages of IRAs that have high or very high wildfire hazard potential, occur within high priority firesheds, fall within community wildfire risk reduction zones, or are within the Healthy Forests Initiative and Restoration Act Wildland Urban Interface. Although the DEIS does not provide enough detail to isolate those acreages or percentages for Wyoming’s national forests, recent fire seasons leave WCCA deeply concerned about the risk of catastrophic wildfire within and adjacent to IRAs.

The DEIS accurately captures that concern on page 94, recognizing that “substantial acreage within potentially affected IRAs has a relatively high likelihood of burning under high-intensity conditions that are difficult to manage or that could expose communities, infrastructure, or drinking-water sources.” That risk is particularly significant where hazardous fuel conditions overlap communities, municipal watersheds, critical infrastructure, important wildlife habitat, and other high-value resources.

The DEIS also recognizes that Alternative 2 would provide the greatest degree of local management flexibility for reducing wildfire risk. As discussed on page 101, “[t]his flexibility is essential for identifying, prioritizing, implementing, and maintaining treatments that address key drivers of wildfire risk, as well as for adapting strategies to changing conditions.” The DEIS further concludes that implementation of the National Active Forest Management Strategy under Alternative 2 would likely expand timber harvest and hazardous-fuels treatments within potentially affected IRAs and direct a greater share of active management toward landscapes where treatments have the greatest potential to reduce wildfire risk to communities, infrastructure, and drinking-water-source watersheds.

Similarly, page 105 acknowledges that Alternative 2 and 3 “would provide additional opportunities for hazardous fuels treatments in priority firesheds and other high-risk areas” compared to Alternative 1. Taken together, these conclusions support providing local Forest

Service officials sufficient flexibility to prioritize and implement proactive fuels treatments where conditions warrant, before wildfire occurs and while treatment options remain available.

Wildfire risk is inherently site-specific and changes over time. Fuel loading, forest health, drought, insect and disease mortality, topography, community exposure, infrastructure, and watershed values vary substantially across IRAs. A static national rule is poorly suited to determining where, how, and when treatments are warranted. Forest-level planning and project analysis allow those decisions to respond to current landscape conditions, local priorities, best available scientific information, and the specific risks and resource values present on the ground.

For the same reason, WCCA recommends revising the second sentence of the first paragraph on page 84 to better reflect the full range of wildfire consequences. The sentence should read: “In the wrong place at the wrong time, wildfires can threaten lives, homes, infrastructure, important natural and cultural resources, destroy important wildlife habitat, increase sedimentation, reduce water quality, and increase fuels and susceptibility for future fires.”

E. Water Quality

A major concern raised by many proponents of the RACR is the potential effect of roads on water quality. The WCCA does not discount that concern. As discussed on page 122 of the DEIS, “[r]oad construction and native surface forest roads are the largest source of sediment related to timber harvest operations.” However, in the same paragraph, the DEIS points out that using Best Management Practices (BMPs) during road construction and maintenance can reduce these impacts to levels consistent with the Clean Water Act (CWA).

This distinction is important. The relevant question is not whether roads can affect water quality, they can, but whether those effects can be appropriately avoided, minimized, and managed through modern road design, construction, maintenance, and site-specific mitigation. The available evidence demonstrates that they can.

According to the Society of American Foresters “Roads in Managed Forests” Position Statement, “BMPs provide specific guidance and methods on how to design features that effectively limit surface erosion and mass soil failures, provide direction for safe storm flows, fish passages through culverts, and other critical environmental safeguards.” In a literature review, Christan et al (2016) found that forestry BMPs minimize water quality effects of forest operations when implemented as recommended by state forestry agencies and that research studies from multiple regions across the U.S. have demonstrated that BMPs are effective at reducing sediment delivery to streams.

Wyoming has decades of experience implementing and evaluating forestry BMPs. The State approved Forestry BMPs in the 1990s which were updated in 2004 and has sponsored BMP workshops for logging companies and timber purchasers since the early 2000s. As discussed on

page 117 of the DEIS, the Forest Service also implemented its National Best Management Practices Program in 2012 to improve management of water quality consistent with the CWA and State water-quality programs.

Since 2001, the Wyoming State Forestry Division has led a multi-disciplinary BMP audit every three years to evaluate the application and effectiveness of BMPs on State, Forest Service, and private timber sales. The most recent audit, conducted in 2023, resulted in a BMP application rating of 99% and a BMP effectiveness rating of 99% (Wyoming Forestry Best Management Practices 2023 Field Audit Report). Those results demonstrate that Wyoming has both the practices and the institutional experience necessary to manage the water-quality risks associated with forest roads and timber operations.

Accordingly, the potential for roads to affect water quality should not be treated as a reason to retain a categorical prohibition on road construction. Those risks are better addressed through forest and project planning, where road location, design, maintenance, hydrologic conditions, watershed sensitivity, and appropriate BMPs can be evaluated based on the conditions on the ground.

F. Municipal Watersheds

Wyoming's national forests contain 41 municipal watersheds, of which 142,520 acres are within IRAs. The Medicine Bow-Routt National Forest alone supplies water to approximately one quarter of Wyoming's population.

RACR can complicate efforts to scale proactive plan-consistent source-water protection where priority acres lie inside IRAs, precisely where road access for treatment corridors may be needed to reach stands, install control lines, or remove hazardous fuels. The water-quality stakes are not hypothetical. Federal science agencies document that severe wildfires can trigger years of elevated turbidity, sediment, nutrients, and metals in drinking-water supplies, driving costly emergency operations, dredging, and treatment upgrades (Murphy and Ebel, 2023).

The importance of these watersheds makes proactive forest management especially critical. The town of Encampment, for example, is investing in forest-restoration work in cooperation with the Forest Service and Wyoming State Forestry. Forest thinning, prescribed fire, and other restoration treatments can reduce risk of catastrophic wildfire and protect communities from the substantial costs associated with fire suppression, post-fire erosion, sedimentation, and damage to water infrastructure. Yet the RACR restrictions can make those treatments more difficult, more expensive, and less effective.

Wyoming has already experienced those limitations. For example, in 2016 and 2017, the State of Wyoming, local governments, and other stakeholders attempted to develop a collaborative approach in the Bighorn National Forest that would allow proactive management within the

roadless portions of two municipal watersheds serving Sheridan and Buffalo. Despite those efforts, local governments and the Forest Service were unable to reach consensus, and none of the proposed projects advanced beyond the conceptual stage. That experience illustrates a central concern with the RACR: even where local governments, state agencies, and land managers recognize a need for preventive action, the Rule can narrow the range of available options before site-specific planning and analysis even begin. While the RACR did not wholly preclude action, it reduced the project scope, increased costs, and left portions of both watersheds exposed to risks that could have otherwise been abated.

The DEIS itself recognizes on page 123, “[m]ost forest plans acknowledge the need for protections for municipal watersheds with plan components that have an overall management objective to maintain and improve watershed status.” That recognition should be carried further. The Final EIS should expressly acknowledge that protecting municipal watersheds may require not only restrictions on development or disturbance, but also affirmative, proactive management to reduce the likelihood and consequences of catastrophic wildfire.

The economic case for proactive management is substantial. Recent research has shown that every dollar invested in proactive forest management can generate a [sixfold return](#) in avoided damages by reducing losses to homes, lives, communities and ecosystems (World Resources Institute, 2026). Those benefits should be fully considered in the final EIS’s discussion of municipal water use and social and economic effects.

Protecting municipal watersheds requires more than limiting what can occur within them; in many cases, it requires the ability to actively manage forest conditions before wildfire, insects, or other disturbances create far greater risks. Achieving desired conditions may therefore require thinning, fuels reduction, prescribed fire, or other site-specific treatments. Forest plans are better suited to identify those desired conditions and determine, through site-specific analysis, which management tools are necessary to protect water quality, water infrastructure, and community resilience.

G. Biodiversity - Wildlife

As discussed on page 131 of the DEIS, every forest plan governing Wyoming’s national forests contains multiple requirements to protect and/or improve wildlife habitat including maintaining the diversity of plant and animal communities, supporting the persistence of native species, and contributing to the recovery of Threatened and Endangered species. Those requirements are implemented through numerous Standards, Guidelines, Desired Conditions, and Objectives tailored to the ecological conditions and management needs of each national forest.

The lists of Potential Adverse Effects from Road Construction or Reconstruction, Potential Adverse Effects of Timber Harvest, and the Potential Beneficial Effects of Road Construction, Reconstruction, and Timber Harvest on pages 140-157 are all potentially valid depending on the

species, habitat, location, timing, and scale of the activity. As the DEIS acknowledges on page 149, the long-term benefits of reducing the risk of catastrophic fires may outweigh short-term negative effects. Given the catastrophic fires that have burned in Wyoming's national forests in recent years, the WCCA understands the challenge of balancing immediate disturbance against longer-term habitat and ecosystem benefits.

This balancing is precisely the type of determination best made through forest and project planning. Forest planning can identify the desired conditions for a particular landscape and establish the standards, guidelines, objectives, and other plan components necessary to maintain or move those landscapes towards desired conditions. Project-level analysis can then evaluate the actual effects of a proposed road, vegetation treatment, fuels project, or other management action in light of the species, habitats, and conditions present on the ground. A national prohibition through the RACR cannot make those distinctions with the same degree of precision.

As noted in the WCCA's NOI comments, the Wyoming Game & Fish Department's (WGFD) Statewide Habitat Plan (WGFD, 2025) identifies Restoration Habitat Areas as places that "can and should be actively restored to achieve greater wildlife value." Those areas are identified by regional teams of aquatic and terrestrial biologists and are published by WGFD in both Terrestrial and Aquatic Restoration Habitat Priorities to help guide partners towards locations where habitat treatments are most likely to succeed over the ensuing five years. Those priorities apply across ownership and jurisdiction, including National Forest System lands.

Because Wyoming contains extensive IRAs, a substantial portion of WGFD's Terrestrial Restoration Habitat Priorities (approximately 2.6 million acres, or 78 percent) are within IRAs. Where that overlap occurs, the RACR's restrictions on road construction and reconstruction and its limitations on timber removal materially constrain the very actions the Statewide Habitat Plan identifies as necessary for "active restoration." Whatever role past management limitations may have played in creating or exacerbating those conditions, the important point now is that Wyoming's wildlife professionals have identified management within these areas as ecologically significant to improving game habitat. That information should prompt a change in course. Examples include aspen regeneration that depends on conifer removal, sagebrush and mountain-shrub restoration, and targeted fuel treatments designed to improve big-game transition and winter range. The practical result is fewer acres treated, higher treatment costs, and lost windows of ecological opportunity in landscapes that wildlife experts have specifically identified as priorities for restoration.

While some species may benefit from large unroaded areas across portions of their range, retaining the RACR is not synonymous with protecting wildlife habitat. In some circumstances, the Rule can constrain the restoration, mitigation, and vegetation-management work necessary to improve winter range, migration routes, forest resilience, and, in some cases, species recovery. Wyoming's efforts to return management authority for the grizzly bear will undoubtedly be cited

by some as a reason to retain the RACR. But that argument assumes that a categorical prohibition on road construction is itself necessary to achieve the habitat conditions those species require.

Forest plans provide a more direct and durable means of addressing those habitat needs because they can—and must—identify the desired conditions toward which management should be directed and establish the standards, guidelines, objectives, and other plan components necessary to achieve them. Fundamentally, an IRA boundary drawn decades ago is not a desired condition; it is an administrative inventory. The relevant question is what ecological and habitat conditions should exist on the ground and what management is necessary to maintain, restore, or improve those conditions.

H. Social and Economic

The USFS's Comparison of Effects table summarizes the social and economic effects of the alternatives, stating that Alternative 2 would enhance the quality of life for people who value timber harvest and its economic contributions, while also having the greatest negative effects on the quality of life of people who place intrinsic value on roadless areas, the ecosystem services they provide, and associated recreation benefits. WCCA believes this framing presents a false equivalence. Support for rescinding the Roadless Rule does not necessarily reflect opposition to the protection of roadless or unroaded areas. Counties, communities, and other stakeholders may place substantial value on maintaining such areas while also questioning whether a nationally prescribed rule is the appropriate mechanism for determining where and how those protections should apply. The more relevant policy question is therefore not whether roadless areas should be protected, but at what level and through what process those determinations are best made.

The DEIS itself recognizes that forest restoration and fuels management can produce substantial social and economic benefits. As discussed on page 215, those benefits include enhanced ecosystem services, such as clean air and clean water, as well as avoided wildfire suppression costs. On that same page, the DEIS further notes that investments in forest restoration in high-risk, high-value watersheds may return more than seven dollars in benefits for every dollar invested. In some cases, restoration and fuels-management projects may also generate forest products, with revenues returned to the Forest Service or the value of those products used to offset the cost of additional treatments. These benefits should be weighed fully when comparing the social and economic effects of the alternatives.

Similarly, the non-commodity values identified on page 216 as benefits associated with roadless areas are not unique to IRAs. Values such as clean water, wildlife habitat, scenic quality, recreation, solitude, and other ecosystem services are present throughout the National Forest System and are already considerations in forest planning. This is especially important given that approximately 27.2 million acres, or 61%, of the 44.7 million acres under consideration are either within one-half mile of an existing road or within the Wildland Urban Interface. The final

EIS should avoid implying that these values depend on continued designation under the RACR and should instead acknowledge that the 2012 Planning Rule requires the Forest Service to consider and manage for ecological, social, and economic sustainability across the broader forest landscape as part of forest planning.

V. Conclusion

WCCA respectfully requests that the Forest Service select Alternative 2 and rescind the 2001 Roadless Area Conservation Rule. Rescission would not determine that roads should be constructed, timber harvested, or other development allowed within any particular area. Rather, it would return those decisions to the forest-level planning and project-level processes established to evaluate current conditions, resource values, multiple-use needs, and the best available scientific information with meaningful participation by state and local governments and the public.

Wyoming counties recognize and value the wildlife habitat, watershed protection, recreation opportunities, scenic qualities, carbon storage, solitude, and other benefits associated with many unroaded landscapes. Those values can and should continue to be protected where appropriate.

Alternative 2 returns decision-making authority to the appropriate level within the Forest Service and allows roadless values to be identified, balanced, and protected through the same forest-planning framework used to manage the other ecological, social, and economic values of the National Forest System. WCCA looks forward to continuing to work with the Forest Service to ensure that Wyoming's national forests remain healthy, resilient, productive, and responsive to the communities and resources they support.

Sincerely,



Natalia D. Macker
President, WCCA
Teton County Commissioner

CC: The Honorable Governor Mark Gordon
The Honorable United States Senator John Barrasso
The Honorable United States Senator Cynthia Lummis
The Honorable United States Congressman Harriet Hageman
Kelly Norris, Wyoming State Forester
Kristy Groves, Forest Supervisor on the Ashley National Forest

Andrew Johnson, Forest Supervisor on the Bighorn National Forest
Shawn Cochran, Forest Supervisor on the Black Hills National Forest
Chad Hudson, Forest Supervisor on the Bridger-Teton National Forest
Mel Bolling, Forest Supervisor on the Caribou-Targhee National Forest
Dawn Laybolt, Forest Supervisor on the Medicine Bow-Routt National Forest and
Thunder Basin National Grassland
Ken Coffin, Forest Supervisor on the Shoshone National Forest
David Whittekiend, Forest Supervisor on the Uinta-Wasatch-Cache National Forest

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