



*Via electronic mail*

September 18, 2025

Dear Secretary Rollins,

The Appalachian Trail Conservancy (ATC) submits these comments regarding the Administration's decision Notice of Intent (NOI) FS-2025-0001-0001 to rescind the 2001 Special Areas Roadless Area Conservation Rule (Rule). As nearly half of the Appalachian National Scenic Trail (A.T.; ANST; or Trail) is located on National Forest System (NFS) lands managed by the USDA Forest Service (USFS), the Trail and its cooperative management are directly affected by the Rule and decisions to rescind it. ATC cannot support the rescission of the Rule as the government has not conducted a stakeholder process to reflect the value of rescissions or explore impacts thereof, does not seem to have considered the cost of an increased transportation system or of the potential loss of recreational and ecosystem benefits, and because it is not clear that the diminished staff of the USFS can handle additional responsibilities without compromising standards of land management. We urge the Administration to conduct an stakeholder process evaluating conditions today before it moves to rescind the Rule entirely.

Founded in 1925 to bring into existence a footpath spanning the ridgelines of the Appalachian Mountains, ATC is the 501(c)(3) organization that coordinates the Cooperative Management System (CMS) of the ANST. We work with the USFS, the National Park Service (NPS), 14 states, and 30 local A.T. Clubs to provide the care and direction needed to sustain the A.T. Over 5,000 volunteers contribute more than \$7 million in labor each year, empowered under the National Trails System Act to perform substantive work on federal lands that elsewhere is restricted to federal employees. The A.T. itself extends 2,197 miles through more than 375,000 acres of conserved land (the A.T. Corridor), traversing eight national forests and serving as the backbone of the largest continuous stretch of public land in the eastern United States. Our long-standing partnership with the USFS—and the significant portion of the A.T. that lies within national forest lands—underscores ATC's vested interest in decisions affecting roadless areas and the future management of the National Forest System.

With our USFS partners, ATC and the A.T. Clubs are responsible for ensuring that the “maximum recreation potential and...conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the area[s]” through which the A.T. passes are available for the public to experience.<sup>1</sup> Accessing these “Congressionally identified values” is key to the “A.T. Experience,” and, as the ANST Comprehensive Plan reflects, “[i]t is not only the quality of the landscape and visible land uses which affect the Appalachian Trail experience...Even where the Trail seems securely enveloped in National Parks, National Forests, and state park and forest land, activities on lands adjacent to or within these units may adversely affect the Trail.”<sup>2</sup>

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<sup>1</sup> 16 USC 1242(a)(3).

<sup>2</sup> *Comprehensive Plan for the Protection, Management, Development[,] and Use of the Appalachian National Scenic Trail (Comp Plan)*, September 1981, at 25.

## Concerns with the Rescission Process

The Administration's decision to rescind the Roadless Rule was made in the absence of a stakeholder process that reflects the value of that decision, unlike the process that resulted in the Rule's adoption in 2001. This is regrettable and unnecessary. This rescission is also occurring during a particularly robust series of administrative actions undertaken to change other fundamental aspects of governmental organization and provision of services, all during the height of the field season for our public lands. We are not reflexively opposed to change.<sup>3</sup> The timing and pace of these actions, including this rescission, are troubling because they deny stakeholder groups and the public the ability to evaluate, comment, and contribute meaningfully before such consequential changes are finalized.

The supplementary information regarding the rescission references some valid reasons for reviewing the Rule and for a potential shift in policy. Among those changes are the "occurrence of moderate- to high-severity fire inventoried roadless areas," and "increased insect and disease" activity.<sup>4</sup> These activities, driven in significant part by climate change, may require that a different national policy (such as outlined within Executive Orders 14192, 14225, and 14154<sup>5</sup>) be adopted. Furthermore, the Administration's decision to retain the independently developed and adopted Idaho and Colorado Roadless Rules reflects its understanding that having roadless areas and requirements within forests for roadless management is appropriate in the NFS.

The Rule provides certainty. Removing it without a clearly articulated, scientific rationale informed by a meaningful stakeholder process, and without the potential for more local requirements to seamlessly take its place, creates confusion and weakens cooperative management efforts.

## Impacts on the Appalachian Trail and Adjacent Landscapes

The Appalachian Trail runs through or alongside tens of thousands of acres currently impacted by the Rule. For example, its southern terminus at Springer Mountain sits within the Lance Creek Roadless Area in the Chattahoochee-Oconee National Forest and the Trail in the White Mountain National Forest runs through most of the forest's Inventoried Roadless Areas (IRAs). Since its adoption in 2001, the Rule has been scaffolding supporting the A.T. Management Areas (MAs) in forest plans. Indeed, every forest plan with an A.T. MA presumes the Rule's effect, so

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<sup>3</sup> Nor is ATC reflexively opposed to logging. As the A.T. Comprehensive Plan states, "...[E]mphasis should be on the integration with compatible land uses, rather than on an attempt to preclude them... Harvesting of timber in areas adjacent to the Trail, long a tradition, is considered a compatible use in general and an understood use in National Forests. Again, the emphasis for the Trail community will be on seeking careful consideration of these impacts of such management on the Trail experience, rather than on an attempt to prevent it. Where other projected land uses, including energy development projects, appear to conflict with Trail values, ways to reduce the impacts will be sought at the planning stage."<sup>3</sup> (*Comp Plan* at 26.) We would note that recent, proposed changes to the USDA's National Environmental Policy Act regulations would restrict public input as well as the ability of cooperative managers like ATC and the A.T. Clubs to engage during the planning phases of relevant projects, if adopted.

<sup>4</sup> Special Areas; Roadless Area Conservation; National Forest System Lands 90 Fed. Reg. 42179, 42181 (August, 239, 2025).

<sup>5</sup> Exec Order No. 14192 *Unleashing Prosperity Through Deregulation*, 90 Fed. Reg. 9065, January 31, 2025; Exec. Order No. 14225 *Immediate Expansion of American Timber Production*, 90 Fed. Reg. 11365, March 1, 2025; and Exec Order No. 14154 *Unleashing American Energy*, 90 Fed. Reg. 8353, January 29, 2025.

current management prescriptions do not anticipate either timber extraction or additional transportation infrastructure within the middleground or background visible from the A.T. Rescinding the Rule calls into question whether the A.T. will now be adequately managed for across its approximately 1,000 miles within the NFS. Given the difficulties in updating forest plans, it is impossible to know the next opportunity that the A.T. community will have to collaborate on reasonable and appropriate prescriptions and management priorities.

Elsewhere along the Trail, whether on NFS, National Park System, or private lands, forest roads from logging projects past remain indelibly marked on the landscape. There are instances in which these roads have been transformed into trails, such as through the USFS' Legacy Roads and Trails (LRT) program. For the A.T., these "forest roads" remain access points for cooperative managers to access the treadway and Corridor for stewardship purposes but their current utility does not always justify, from our perspective, their presence. Most forest roads—some dating back more than a century—remain as scars on the landscape, reminders of resource extraction beyond the lifetime of current land stewards. Their rehabilitation is rarely considered and generally not feasible due to soil compaction and gravel additions which are the result of even short-term and single-event road usage events. Such roads fragment habitat, degrade water quality, diminish scenic values, and undercut the immersive backcountry experience that makes the A.T. unique on the east coast. If adjacent roadless lands within the Trail's viewshed are open to development, the superlative scenic values of the A.T. could be irreparably compromised.

Beyond physical impacts, the practical implications for ATC staff, Club volunteers, and USFS staff are serious. Our regional, on-the-ground team would need to spend considerable time and resources reverting to our now-defunct regular monitoring of road-building proposals near the Trail. This diverts capacity from other urgent work, such as disaster response following events like Hurricane Helene and the daily responsibilities of cooperatively managing this iconic resource. Additionally, with an estimated 5,000 public servants having left the USFS in the past months and the Administration's stated intention to majorly restructure the USFS, it is unclear whether the agency has the staffing capacity to implement this directive and what capacity our NFS partners will have to evaluate proposed projects once a rescission is completed.

### **Financial and Practical Concerns with the Recission and New Roads**

The U.S. Forest Service already faces an overwhelming backlog in its transportation system. The National Forest System contains 368,000 miles of roads, with 65,000 maintained for passenger use. 103,668 miles of these roads are rated maintenance level 1, or in storage and closed to all traffic. 199,472 miles of these roads are maintenance level 2, for high-clearance vehicles (generally related to resource extraction). Of the USFS's \$10.8 billion deferred maintenance backlog, roughly \$6 billion is in transportation infrastructure. Commercial harvesters are responsible for caring for the transportation infrastructure needed to bring timber to market and may deposit funds in lieu of performing their commensurate share of road maintenance, but only for a time. At some point, the roads then become the responsibility of the USFS—and the public—to maintain as they cannot all be turned into trails, nor should they be. Given the Forest Service's current budget and staffing posture, annual maintenance funding is insufficient to support the existing road system. Expanding a system that cannot be adequately maintained is fiscally unsound and diverts resources from higher priority needs.

We must also consider the economic costs of losing remote roadless areas that currently sustain outdoor recreation. Vitally, according to the most recent and out-dated (2019) numbers, recreation on NFS lands contributes \$15.6 billion annually to the U.S. economy—significantly more than timber (\$5.2 billion) or minerals (\$9.5 billion). Markets for timber are weak and volatile, and the economic return from opening additional roadless areas is uncertain. Building roads to reach timber in many cases with no market value will not strengthen domestic timber supply and will overextend agency capacity (the LRT program exists precisely because past overexpansion created a network that now requires remediation, not expansion). The USFS records NFS lands contributing to \$10.1 billion in local spending and 153,800 jobs. Because the Trail draws significant outdoor recreation dollars into these communities, new road construction that diminishes the backcountry experience risks undercutting local economic benefits.

### **Ecosystem Services and the A.T. Experience**

Just as the economics of maintaining an expanded NFS road system and potentially compromising recreational experiences are of questionable viability, the ecological consequences are equally concerning. The NFS is a multi-use area and, in the east, one of the driving goals of the Weeks Act and the forests it facilitated (all of the A.T.'s eight national forests) was to reforest lands that had been over-extracted and threatened the public health due to soil erosion and potential contamination of source water for communities large and small. The ecosystem services (e.g. source water provision, air filtration, and flood mitigation) that the national forests provide are critical to the health of the American population in addition to the trust resource flora and fauna managed by the state and federal governments.

To maximize ecosystem services, sufficient acreage of contiguous, undeveloped land is necessary. Roadless areas contribute to the needed scale, safeguarding water, habitat, and intact landscapes—values central to both the Appalachian Trail Experience and the health of surrounding communities. Such protected areas are especially vital in the East, where public lands are more limited and each remaining undeveloped area carries disproportionate weight for conservation and recreation. The benefits (most of the Congressionally identified values) are not abstract: millions of hikers annually experience and are transformed by the A.T.'s clean streams, (re)connected forests, and healthy ecosystems. The decrease in ecosystem services, which are, in a sense, free, must be met with increased human-generated services (e.g. more water filtration plants and devices mitigating pollution introduced into public water supplies.) Unlike roads, which can scar landscapes for generations, intact roadless areas sustain ecological and recreational benefits across multiple lifespans. These benefits, though harder to quantify than board feet of timber<sup>6</sup>, are essential. Rescinding the Rule nationally<sup>7</sup> without considering these values disregards long-term benefits that far exceed any short-term gains.

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<sup>6</sup> The previous administration did excellent work exploring the value of natural capital assets and ecosystem services, such as in Office of Management and Budget, *Assessing Changes in Environmental and Ecosystem Services in Benefit-Cost Analysis* (Aug. 2, 2023), <https://www.whitehouse.gov/wp-content/uploads/2023/08/DraftESGuidance.pdf> and Office of Science and Technology Policy, Office of Management and Budget, Department of Commerce, *National Strategy to Develop Statistics for Environmental-Economic Decisions*, (Jan. 2023), <https://bidenwhitehouse.archives.gov/wp-content/uploads/2023/01/Natural-Capital-Accounting-Strategy-final.pdf>.

<sup>7</sup> Except Idaho and Colorado.

Relatedly, the Administration has clearly articulated it wants to increase logging on NFS lands, both to support the domestic timber industry and as active land management designed to mitigate against the damage of devastating wildfires. Obviously, mega-fires and invasive species decrease ecosystem services substantially. We are unclear on the relative value of incentivizing private timbering on NFS lands, but the importance of active management for wildfire is something we understand well on the A.T. Increasingly dry conditions, driven in part by climate change, have made droughts more frequent and longer lasting than they were when the Rule was adopted. ATC is extremely empathetic to these concerns, particularly for our neighbors in the ten western states possessing more than 95% of the IRAs and who have experienced increasingly devastating mega-fires as climate change has exacerbated drought and any number of land management and development issues.<sup>8</sup> Increased logging without accounting for and valuing ecosystem and recreational services runs the risk of negatively impacting forest health and productivity without mitigating wildfire or invasive species risks.

ATC urges the Department to reconsider the rescission of the Roadless Rule, to postpone it until local roadless rules are able to be promulgated (in line with the NOI's "intent[] to return decision making for road construction, road reconstruction, and timber harvesting in inventoried roadless areas to local officials, in conjunction with Forest-level land management planning"<sup>9</sup>), or at minimum to pause this action until the rationale, data, and projected impacts are made clear and subject to meaningful public comment. The Cooperative Management System that sustains the Appalachian Trail depends on deliberate, transparent processes, not rushed, policy shifts based on presumption or expectation.

Respectfully,



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Director of Federal Policy  
Appalachian Trail Conservancy

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<sup>8</sup> The increase in the Wildland-Urban Interface (WUI) has contributed significantly to the devastation of these increasingly damaging wildfires, in part by multiple the acres and persons who may be affected. As human civilization continues to convert wildlands to developed lands, more land will need more active management and the increase of loss of human life and property will continue to increase. How and where we build human infrastructure is as important as how and where we manage natural infrastructure.

<sup>9</sup> Special Areas; Roadless Area Conservation; National Forest System Lands 90 Fed. Reg. 42179 (August, 239, 2025).