



Via electronic mail

September 17, 2026

IN RE: FS-2025-0001-223869

Dear Secretary Rollins,

The Appalachian Trail Conservancy (ATC) submits these comments regarding the Administration's Draft Environmental Impact Statement (DEIS) addressing potential rescission of the 2001 Special Areas: Roadless Area Conservation Rule (Roadless Rule or Rule). Nearly half of the Appalachian National Scenic Trail (A.T., ANST, or Trail) is located on National Forest System (NFS) land managed by the USDA Forest Service (USFS). ATC is therefore directly affected by policies that guide the management of inventoried roadless areas (IRAs) and the broader NFS.

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 ANST. More than 4,592 volunteers contributed over \$5.4 million in labor to the A.T. in 2025. The A.T. itself extends 2,197 miles through more than 375,000 acres of conserved land, traversing eight national forests, with 9% of its length in IRAs. Our long-standing partnership with the USFS—and the significant portion of the A.T. that lies on NFS lands—underscores ATC's vested interest in decisions affecting roadless areas and the future management of the NFS.

Concerns with the Rescission Process

ATC remains concerned that the pace and structure of this rulemaking have limited meaningful stakeholder engagement and that the rulemaking was initiated without either widespread public interest in revisiting the Rule or after comprehensive education of the public by the Department as to why revisiting it would be valuable. The U.S. Department of Agriculture's (USDA or The Department) September 2025 Notice of Intent (NOI) provided ATC field staff with only 21 days to review the proposal and submit comments. The current DEIS is approximately 333 pages and is subject to another short comment period during the height of the field season for ATC and many other public land-operating organizations.

The process has also provided limited opportunities for public dialogue. During development of the 2001 Roadless Rule, the USFS held more than 600 public listening sessions and meetings nationwide.¹ In contrast, the current process has not included any public meetings or hearings comparable to those held during the original rulemaking.² ATC believes that a decision affecting

¹ U.S. Dep't of Agric., Forest Serv., *Roadless Area Conservation Final Environmental Impact Statement*, vol. I, at 4-2, 4-4 (Nov. 2000).

² Letter from 39 U.S. Senators and Members of the House of Representatives to Brooke Rollins, U.S. Secretary of Agriculture, and Tom Schultz, Chief, U.S. Forest Service (Sept. 3, 2026)

tens of millions of acres and the management of public resources such as the A.T. warrants meaningful opportunities for public engagement and dialogue.

ATC's concern is not simply about the amount of time available to submit comments. The proposed rescission would remove a nationwide management framework, place greater weight on future forest planning and project-level decisions, and would impact trust resources, including those the A.T. was created to protect.

The DEIS Does Not Demonstrate a Sufficient Need for Nationwide Rescission

ATC recognizes that conditions facing the NFS have changed since the Roadless Rule was adopted in 2001. Wildfire, insect and disease outbreaks, changing forest conditions, public benefit needs, and other challenges warrant continued consideration of how the USFS manages NFS land, including IRAs. ATC is not reflexively opposed to changes in policy, nor does it suggest that management conditions have remained unchanged. Rather, the DEIS does not demonstrate why the appropriate response to those changing conditions is to repeal (Alternative 2), modify the Rule as proposed (Alternative 3), or why the Department has not more fully explored a phased approach to replacing the Rule with state-level roadless rules, such as those that exist in Colorado and Idaho and would make the most sense given the Department's stated intention to return control to the local level.

The existing Roadless Rule already contains exceptions that allow certain activities where necessary to address public health and safety, protect resources, exercise valid existing rights, and carry out other specified activities. The DEIS documents numerous exceptions and management activities occurring under the existing framework, including forest management and hazardous fuels work. The DEIS also recognizes that hazardous fuels treatments and other fire-management activities can occur under Alternative 1 (no rescission).

At the same time, the DEIS identifies substantial potential consequences associated with Alternative 2 (full rescission), including increased road construction and timber harvest, adverse effects to recreation and scenery, habitat fragmentation and loss of connectivity, and impacts to water resources and species. The Department should identify and quantify the management needs that cannot reasonably be met through existing exceptions or management activities permitted under the Rule, and explain why those unmet needs require nationwide rescission rather than more targeted changes.

The DEIS itself reflects that there are ways to address specific management needs without necessarily eliminating the national framework altogether, including approaches involving modified boundaries, refined exceptions, targeted access, and other more limited changes. The range of anticipated impacts discussed in the DEIS underscores that the Department must explain more clearly why the most sweeping option—nationwide rescission—is necessary or why the modification in Alternative 3 would be preferable to Alternative 1.

Rescission Without Replacement Protections Creates a Management Gap

The stated rationale for rescission is closely tied to the goal of returning greater decision-making authority to state and local officials. However, rescission would first remove the national baseline that currently applies to forest management without ensuring that comparable protections are in place at the state or forest level. The national baseline, it is important to note, was instituted in part because of the persistent difficulties forests experienced in forest planning due to intractable stakeholder positions. The current, compromise rule, was hard-fought by many stakeholders (and informed by significant public engagement) to remove one consistently difficult topic from needing to continually be addressed at the local level. The Department should explain why local flexibility requires eliminating the national framework before replacement approaches are developed.

This concern is particularly important for the A.T. The Trail crosses multiple NFS units and state jurisdictions and is managed through a cooperative framework that depends on consistent consideration of the landscape through which it passes. A patchwork of different approaches to roadless landscapes could make it more difficult for the CMS to protect the Trail's nationally significant scenic, natural, historic, and cultural qualities across administrative boundaries. The current A.T. Management Areas (MAs) in forest plans are the result of dedicated attention provided by the USFS to the A.T., including by a since-eliminated staff position that coordinated across forests.

Idaho and Colorado have independently developed state-specific roadless rules, demonstrating that state-based approaches can coexist with roadless protections. The DEIS recognizes that additional state-specific rulemaking could occur in the future, but the effects and timing of such future rulemaking are not known. Similarly, existing forest plans can be amended or revised which in itself is an infrequent and lengthy process, but rescission itself does not ensure that such changes will occur before national protections are removed. In fact, the current average interval between forest plan revision is 15-20 years or longer and has proven such a significant challenge for the USFS with its current resources that a significant number of existing forest plans pre-date both the 2001 Rule and the 2012 Forest Planning Rule. Amendments to forest plans, which are easier to accomplish but are by no means expediently advanced, have become the norm for the NFS.

This also implies significant reliance interests. For more than two decades, ATC, the USFS, A.T. Clubs, and other cooperative-management partners have conducted forest planning, Trail management, monitoring, and stewardship against a consistent national roadless-management baseline. The Department should evaluate the operational and administrative consequences of removing that baseline before replacement direction is established.

This sequencing creates a management gap. If the Department believes that roadless management is best addressed through state, forest, or local processes, it should consider how to provide a meaningful management framework before the nationwide baseline is eliminated. Rulemaking to amend existing forest plans and subsequently repeal the national Rule regarding roadless areas would be more reasonable. Otherwise, the immediate effect of rescission is not simply to transfer decision-making to states and local communities; it is to remove an existing

layer of management direction and leave future management to processes that may differ substantially across jurisdictions and under significantly outdated models and guidance.

Rescission Would Increase Long-Term Road Costs and Transportation Obligations

The USFS already faces a substantial financial and maintenance burden associated with its existing transportation system. The NFS contains approximately 368,000 miles of roads, while the USFS estimates that approximately \$1.6 billion annually is needed to maintain the existing road network in a state of good repair. In FY 2023, the agency received approximately \$270 million for this purpose—less than 20 percent of its estimated annual need. The USFS also estimated in 2024 approximately \$6.9 billion in deferred maintenance for passenger-car roads and bridges.

ATC strongly advocates for increased funding for the USFS's existing transportation infrastructure and recognizes the importance of a safe, functional road system for rural communities, forest management, recreation, and emergency response. That advocacy reflects our concern that the agency has insufficient resources to maintain the system it already operates. At the same time, the USFS is experiencing significant staffing losses that further constrain its capacity to plan, oversee, and maintain transportation infrastructure. Increasing the potential for road construction while reducing the personnel available to evaluate projects, oversee construction, and manage the resulting infrastructure raises additional concerns about whether the agency has the capacity to responsibly administer an expanded road system.

Importantly, the existing Rule does not prohibit the USFS from maintaining existing roads within inventoried roadless areas. Under Alternative 1, ongoing maintenance of existing roads would continue, while new permanent road construction generally requires an exception to the Rule, which a regional forester may grant. The DEIS therefore distinguishes between maintaining the transportation system that already exists and creating additional road infrastructure.

Alternative 2 would remove those restrictions and create greater opportunities for new permanent road construction. The DEIS acknowledges that new permanent roads would increase future maintenance needs and that an increase in reported deferred maintenance is more likely under Alternative 2. It also recognizes that each additional mile of road competes for limited maintenance funding and that revenues generated by resource extraction would not necessarily cover the costs of constructing and maintaining new roads.³

ATC recognizes that many roads serve important purposes, including access for wildfire response, forest management, recreation, and rural communities. However, the DEIS does not demonstrate that expanding the USFS's transportation system is financially or administratively sustainable given the agency's existing maintenance obligations and staffing constraints. The DEIS should therefore more fully evaluate not only the financial costs of additional roads, but also the staffing and administrative resources necessary to plan, construct, oversee, maintain, and ultimately decommission that infrastructure. At a time when the USFS has substantially less

³ USDA Forest Service, Draft Environmental Impact Statement: 2001 Roadless Area Conservation Rule Rescission 42, 45 (Aug. 2026).

funding than it estimates is necessary to maintain its existing road system, creating additional long-term transportation obligations does not seem to be prudent or cost-effective.

Rescission Could Harm the Appalachian Trail and Congressionally Identified Values

The A.T. is a nationally significant trust resource whose protection depends on more than the narrow Corridor (lands constituting or managed for the A.T.) containing the Trail tread. The National Trails System Act (NTSA) establishes trails across discrete physiographic regions—in our case, the Appalachian Mountains—to maximize recreational opportunity while protecting their nationally significant scenic, historic, natural, and cultural qualities (“values,” in the parlance of the NTSA). For the A.T., these qualities are experienced both within and beyond the Trail Management Areas (MAs) delineated in forest plans. A.T. MAs generally extend approximately one-half mile on either side of the Trail and provide specific management direction for the Trail’s immediate setting. The scenic, natural, and experiential values of the A.T., however, extend beyond those MA boundaries into the broader landscapes visible and experienced from the Trail. Changes to surrounding landscapes—including roads, timber harvest, visible infrastructure, and associated noise and disturbance—can therefore affect the very qualities of the Appalachians Congress sought to protect and draw people to in creating the Trail.

The Appalachian Trail Comprehensive Plan recognizes that some activities adjacent to the Trail can be compatible with the Trail’s purpose when their impacts on the Trail experience are carefully mitigated.⁴ These can include timber harvesting or other management activities that do not compromise the Trail’s Congressionally identified values. ATC’s analysis indicates that approximately 201 miles of the A.T. (9% of the A.T.’s length) pass through inventoried roadless areas.⁵ As the forest plans that include A.T. MAs post-date the Rule, they presume the Rule’s effect. The Rule’s repeal would therefore diminish protections to the A.T. that were negotiated by stakeholders at the time the forest plans were adopted. The Trail’s MAs—with the Rule’s impact from adjacent IRAs—have been the backdrop of the visitor experience on the A.T. for years. As the A.T. is the most-visited national park unit in the United States, with 16.9 million recreational visits in 2025, this change would be significant for millions who recreate on the Trail.

The DEIS itself recognizes that Alternative 2 presents the greatest potential for adverse effects to National Scenic and Historic Trails (NSHTs), including through changes in recreation settings, noise, visible infrastructure, and reduced opportunities for quiet and remote experiences. The DEIS identifies approximately 1,127 miles of National Scenic and Historic Trails within potentially affected inventoried roadless areas. However, the programmatic analysis did not give enough specific consideration to the particular circumstances of the A.T. or other NSHTs, including our linear nature, extensive presence on NFS lands, the importance of surrounding landscapes to our establishment by Congress, and cooperative management to address concerns about rescission of the Rule.

⁴ Appalachian Trail Comprehensive Plan 26 (1981, abridged ed. 1987).

⁵ Appalachian Trail Conservancy, GIS analysis of Appalachian Trail and Forest Service inventoried roadless area spatial data (2026) (on file with Appalachian Trail Conservancy).

Roadless Areas Provide Important Ecological Values

IRAs provide ecological values (in the parlance of the NTSA, “natural” values) that extend well beyond the absence of roads. The DEIS identifies high-quality or undisturbed water and air, sources of public drinking water, diverse plant and animal communities, and habitat for threatened, endangered, proposed, and sensitive species among the characteristics commonly found in roadless areas. These areas also provide large, relatively intact landscapes that support ecological processes and connectivity between habitats. The ecosystem services provided by the lands and waters within the A.T. MAs and by the forests that contain them produce extremely important and under-catalogued value for the American people. Providing clean water, filtering air, and supporting wildlife are critical to public health, and not just to maintain the lands Congress instructed the USFS to do through the NTSA and other statutes.

The DEIS acknowledges that increased road construction, road reconstruction, and timber harvest under the action alternatives could result in habitat loss and degradation, fragmentation and loss of connectivity, barriers to movement and migration, and increased human disturbance, affecting both terrestrial and aquatic habitats. The DEIS further explains that habitat fragmentation can reduce biodiversity, increase isolation and edge effects, and affect species' ability to move among habitat patches. For the A.T., these impacts are particularly relevant because the Trail passes through large, forested landscapes where maintaining ecological integrity contributes to the Trail's natural and scenic qualities and which are generally rare in the highly developed and densely populated East.

Water resources present another significant concern. The DEIS identifies sedimentation and impacts to water quality as potential consequences of increased road construction and timber harvest. It notes that road construction, drainage, road use, stream crossings, and road density can all influence sediment entering streams. Roadless areas can therefore provide important protection for watersheds and water resources by limiting the amount of ground-disturbing infrastructure in relatively intact landscapes. There are 1,800 streams and rivers crossed by the A.T. and it is worth noting that the national forests of the East, of which the A.T. traverses some of the closest to population centers and most-visited, were established following severe deforestation and threats to source water for human communities. From our perspective, the Rule is a continued management investment in returning our eastern forests to a longer-term sustainable and productive state which a repeal of the Rule would endanger.

The potential implications for wildlife and plants are also substantial. The DEIS identifies more than 300 threatened, endangered, and proposed species within the potentially affected environment as well as thousands of Regional Forester Sensitive Species and Species of Conservation Concern. The DEIS' preliminary biological analyses further recognize that future activities could adversely affect listed species and their habitat, subject to subsequent project-level environmental review and ESA consultation. A.T. lands support populations of nine federally listed and 360 state-listed species of rare plants and animals. In addition, the A.T. Corridor is home to more than 80 globally rare species.⁶ Further, non-native invasive species are

⁶ Appalachian Trail Conservancy, *Plant Species Monitoring* ("A.T. lands support populations of nine federally-listed and 360 state-listed species of rare plants and animals" and "the A.T. Corridor is home to more than 80 globally rare

a significant threat to the A.T. The USFS's own research states that non-native plants are twice as common within 500 feet of a road.⁷ It stands to reason therefore, additional roads can increase pathways for the establishment and spread of non-native invasive species.

ATC recognizes that individual projects can be designed to avoid or minimize environmental impacts and that existing laws, forest plans, and project-level review would continue to apply following rescission. However, those subsequent safeguards (outdated as they are) do not eliminate the underlying change in baseline conditions that would result from repealing or modifying under Alternative 3 the national Rule. The DEIS itself identifies increased road construction and timber harvest as potential sources of fragmentation, negative water-quality impacts, and adverse effects to threatened, endangered, and sensitive species. It does not, however, explain that these adverse effects are "worth it" and justify the Rule's repeal.

Rescission Could Undermine Recreation and Local Economic Benefits

Roadless areas provide important opportunities for recreation that depend on maintaining relatively natural, quiet, and undeveloped landscapes. This is particularly important in the densely populated and highly developed East. The DEIS recognizes that Alternative 2 would have the greatest potential effects on recreation and scenery, including increased noise, visible infrastructure, temporary closures, and a shift in some areas toward more developed, road-based recreation. It also identifies potential negative effects for recreation-dependent users, businesses, and communities.

These impacts are important because the recreational value of roadless landscapes is tied to the physical characteristics of those landscapes. Roadless areas can provide opportunities for hiking, backpacking, hunting, fishing, wildlife viewing, and other forms of recreation that depend on relatively quiet and undeveloped settings. The DEIS recognizes that increased road construction and timber harvest could reduce primitive and semi-primitive recreational settings and result in economic losses associated with recreation and other non-commodity values of roadless areas.

ATC recognizes that timber production is an important component of the USFS's multiple-use mission, and we are not suggesting that timber harvest and recreation are inherently incompatible. However, the potential economic benefits of increased timber production should be considered alongside the recreational and economic benefits that could be diminished by changes to roadless landscapes. The DEIS identifies the potential for Alternative 2 to increase timber harvest and associated revenue, but it also acknowledges potential adverse effects to recreation-dependent users, businesses, and communities without completing a cost-benefit analysis between the two.

Outdoor recreation on National Forest System lands is the number one economic contributor of the USFS to the American Gross Domestic Product (GDP). More money is derived from outdoor recreation than from the extractive multi-use purposes of the agency, including timbering and

species"), available at <https://appalachiantrail.org/protect/conservation/science-stewardship/plant-species-monitoring/>.

⁷ Sean P. Healey, U.S. Dep't of Agric., Forest Serv., Long-Term Forest Health Implications of Roadlessness, 15 Env't Res. Letters 104023 (2020).

mineral extraction. Favoring timbering, which produces less money, than outdoor recreation, which produces more money, seems a strange choice and an unnatural market intervention in favor of one (less highly producing) interest over another (more highly producing) interest.⁸

The Department should therefore more clearly evaluate this economic tradeoff. Where road construction and timber harvest could convert relatively remote landscapes into more developed or road-accessible settings, the relevant question is not simply what economic activity rescission could enable, but what economic and recreational value could be lost as a result. The DEIS should fully account for those foregone recreation opportunities and associated local economic benefits when evaluating the consequences of Alternatives 2 and 3.

For the A.T., these considerations are especially important. The Trail's nationally significant scenic and natural qualities depend in part on opportunities for visitors to experience relatively quiet, undeveloped forest landscapes. Changes in the surrounding landscape that introduce roads, visible infrastructure, or increased noise can diminish that experience even where the Trail itself remains intact. Protecting opportunities for high-quality recreation is therefore not ancillary to the purpose of the NFS or the A.T.; it is one of the public benefits that should be weighed alongside the potential benefits of increased resource extraction.

Rescission Would Increase Administrative and Cooperative-Management Burdens

The Roadless Rule provides a predictable and reasonable framework within which the USFS and its partners can manage the lands surrounding the A.T. Removing that framework would shift greater responsibility to individual USFS units, ATC, and A.T. Clubs to evaluate and respond to site-specific proposals for roads, timber harvest, and other activities that could affect roadless landscapes and the Trail experience. More site-specific decisions require personnel to evaluate proposals, conduct environmental review, engage affected stakeholders, oversee implementation, and ensure compliance with applicable requirements. Those responsibilities would arise at a time when the USFS is already facing significant staffing and resource constraints due to a concerted Administration effort to decrease the size of the federal workforce as well as decades of insufficient appropriations.

ATC's staff, along with the volunteers who support the A.T., already contribute substantial time to cooperative management of the Trail and surrounding NFS lands. Without the Rule's baseline land management direction, ATC and its partners would need to devote additional capacity to monitoring proposed road construction and other activities in areas that are currently subject to national restrictions. That could divert limited staff and volunteer capacity away from other priorities, including Trail stewardship, land conservation, visitor engagement, and responding to emerging threats to the Trail.

⁸ U.S. Bureau of Economic Analysis (BEA), *Outdoor Recreation Economic Statistics, U.S. and States, 2024: New Statistics for 2024; Updates for 2020–2023*, BEA News Release No. 26-13 (Mar. 5, 2026), <https://www.bea.gov/sites/default/files/2026-03/ores0326.pdf>.

The Roadless Rule therefore provides more than a substantial direction on land management; it also provides a predictable baseline for cooperative management. That baseline allows the USFS and its partners to focus resources on managing the Trail and its Corridor rather than repeatedly addressing whether new roads, and the potential negative impact to Trail values that come with them, should be introduced into currently roadless areas. For a resource as geographically extensive and administratively complex as the A.T., this consistency is particularly valuable. It does not appear that the Department has considered the additional administrative and cooperative-management burden that would result from removing the national framework, particularly at a time when both the USFS and its partners are operating with increasingly limited capacity.

ATC recognizes that the conditions facing the NFS have changed since the Rule was adopted. Wildfire, insect and disease outbreaks, changing forest conditions, public benefit needs, and other challenges warrant continued consideration of how the USFS manages its lands and resources portfolio. ATC is not opposed to revisiting the Rule or altering management direction as circumstances warrant. However, the DEIS does not demonstrate either that these challenges require eliminating national Roadless Rule protections across millions of acres or that modifying them as proposed is preferable to retaining them. Instead, the DEIS identifies significant potential consequences associated with Alternative 2, including increased road construction and long-term transportation obligations, habitat fragmentation and impacts to biodiversity and water resources, and adverse effects to recreation and scenery.

The reasons the Department cites for considering a rescission or modification of the Roadless Rule are difficult to square with current conditions. The current Rule allows for roads for forest management needs, such as to fight wildfire and treat invasive species. The DEIS also reflects that more roads, in effect, equal more wildfires and more invasive species. The current Rule allows for local management prerogatives in forest planning against the backdrop of IRAs and has removed a significant challenge from promulgating new forest plans. The DEIS does not account for the likely return to more contentious forest planning without a nationwide rule or state-level rules to guide forest planning. The current rule allows for contiguous natural areas within forests to better support the number one economic contribution of national forests, outdoor recreation, as well as the ecosystem services that provide clean air and clean drinking water to the American people. The DEIS acknowledges that these ecosystem services and economic engines are likely to be negatively impacted by repeal. The DEIS reflects that additional roads will require additional funding for roads. The USFS barely receives 20% of what its internal review reflects it needs to maintain the current Forest Transportation System. The DEIS implicitly acknowledges that additional staff time and agency resources will be required to develop and execute forest plans while the agency has seen an exodus of staffing, driven by Administration priorities, of approximately one-quarter of its 2024 staffing levels, and has been woefully under-appropriated for decades. Given all this, the Department simply has not demonstrated that there is a net value to the USFS, National Forest System, or the American people, in Alternatives 2 or 3.

For these reasons, ATC urges the Department not to proceed with Alternatives 2 or 3. The Department should ensure that any changes to management of Inventoried Roadless Areas are supported by a clear demonstration of need and adequately account for the long-term fiscal, ecological, recreational, and Trail-related consequences identified in the DEIS. ATC appreciates the opportunity to comment and looks forward to continuing our over one century of partnership with the USFS and our partners through the CMS to protect and manage the ANST and the NFS lands through which it passes.

Respectfully,

A handwritten signature in black ink, appearing to read 'Max Raphelson', with a long horizontal flourish extending to the right.

Max Raphelson
Federal Policy Specialist
Appalachian Trail Conservancy