

Director, Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

14 September 2025

Dear Director,

The Wyoming Native Plant Society is writing to address the proposed Roadless Rule (90 FR 42179) repeal, as posted on 29 August 2025. It is apparent to our members that this repeal will promote activities and development that have been historically associated with undermining ecological functions of intact landscapes, threatening whole ecosystems and specific habitats for sensitive and/or threatened plant and animal species and their capacity to contribute to healthy air, soil and water qualities in Wyoming and throughout the Intermountain West.

We also maintain that this proposal is not consistent with the stated goal of improving forest management but is intended to promote development work detrimental to healthy landscapes. This is supported by the following facts: Over 7% of the total roadless area is in Wyoming. In 2022, we experienced the biggest fire event in state history, the Mullen Fire, as started by human cause, virtually all outside of roadless inventory area (spanning a number of timber sales). Last year Wyoming had the biggest fire year since the Yellowstone Fires that was started by lightning strikes and which burned more acres of private property below the mountains than in roadless inventoried areas of the Bighorn National Forest (3 converging rangeland fires and the Elk Fire, respectively). By contrast this year, with an exceptionally early start to wildfire season, a lightning strike ignited on June 13 in a roadless inventory area of the Bridger-Teton National Forest (Horse Creek Fire) only burned a limited area thanks to the time of year and considerable fire-fighting effort.

Wyoming also needs its own plan to address Roadless Inventoried lands that span greater than 33% of the 9.2 million acres (about 14,375 mi²) of national forest in our state. Many represent the “Wildland-Urban Interface” as cases of urban sprawl. But there are also unique Wyoming conditions in the mining areas that boomed 150 years ago creating a multitude of primitive roads which later became national forest in the Shoshone National Forest. Roadless areas close to roads are critical in maintaining landscape intactness while acknowledging that they have heightened needs for public communication and management planning on the part of the U.S. Forest Service. However, the U.S. Forest Service is least able to address these needs in general or the complexity of coordinating at the wildland-urban interface at any point in its recent history in light of these 2025 events:

- mass firings starting in February, and
- massive reorganization announced on 1 August 2025.

These events created unprecedented turmoil for both lower- and upper-level personnel and cripple many levels of work making it impossible to imagine that the Forest Service could fairly address the impacts of this proposed action until this situation has stabilized. Any action on the Roadless Rule should be put on hold or only considered insofar as States demonstrate the capacity for addressing plans that in turn, are approved by Congress.

Sincerely,

Lyle King Representing the Wyoming Native Plant Society