

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

8 September 2026

Dear Director,

The Wyoming Native Plant Society is writing to address the proposed rescinding of the Roadless Rule (90 FR 42179) as posted on 20 August 2026. These comments underscore and update those we submitted on 25 Sept 2025 in response to the initial announcement. It is apparent to our members that this proposed action would 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 western United States.

We also maintain that this proposal is not consistent with the stated goal of improving forest management as implied by an act of rescission. Instead, it is proposes rolling back standards, promoting development work detrimental to healthy landscapes. It is based on flawed arguments: roads and logging don't prevent wildfire but are frequent contributing factors. 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). In 2024, 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, in 2025, 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 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 of Wyoming's roadless areas represent the "Wildland-Urban Interface" as cases of urban sprawl and accompanying local development pressure. Turning over national decision-making to individual forests jeopardizes the entire process of "giving due consideration to the relative values of the various resources in particular areas" by national standards. A Wyoming plan is also needed to address unique Wyoming conditions as with the mining areas that boomed 150 years ago, creating a multitude of primitive roads which later became national forest in the Shoshone National Forest. Finally, a Wyoming plan is needed to address the many roadless areas that are critical in maintaining designated wilderness landscape intactness. Any change to the current rule

has heightened needs for fair and consistent public communication and management planning on the part of the U.S. Forest Service.

However, the U.S. Forest Service at the level of each of the eight national forests in Wyoming 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 2025-26 events:

- mass firings in the U.S. Forest Service starting in February 2025, and
- massive reorganization of the U.S. Forest Service underway (<https://www.fs.usda.gov/about-agency/reorganization>) as eliminating a regional level of coordination and transferring regional responsibilities to each national forest, while also creating a new level of state offices in locations with virtually no U.S. Forest Service presence.

These events created unprecedented turmoil for personnel at all levels of work making it impossible for the Forest Service to fairly implement this proposed action. A recent paper posted by the University of Wyoming (Aragon 2025) presents an interpretation that the risks of the proposed action may exceed the benefits (<https://www.uwyo.edu/law/centers/center-for-land-and-water-law/blog/long-road-rescinding-roadless-rule.html>). 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, Conservation Committee

Wyoming Native Plant Society