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Footloose Montana  
Contact: Connie Poten, Board President  
P.O. Box 8884  
Missoula, Montana 59807

*Comment on the proposal to rescind the 2001 Roadless Area Conservation Rule (2001 Roadless Rule) (66 FR 3244, 36 CFR Subpart B (2001)).*

We strongly oppose the Trump administration's proposal to rescind the 2001 Roadless Area Conservation Rule, which has protected nearly 60 million acres of publicly owned forests, amounting to nearly one-third of all U.S. national forests, from road construction, logging and mining. It is thanks to the Forest Service's Inventoried Roadless Areas that in Montana, 38% of our national forest lands—about 6 million acres—are protected from most road construction and timber harvest. Roadless areas serve as essential safeguards for preserving wildlife habitat, ensuring clean water, supporting recreation economies (e.g., hiking, skiing, canoeing and wildlife viewing), climate resilience and public health.

### **1. Wildlife and Biodiversity**

Roadless areas are some of the last refuges for many wild animals, including threatened, endangered and sensitive wild animal species (e.g., grizzlies, lynx, salmon and migratory songbirds). Scientific studies have shown that roads fragment ecosystems, disrupt movements of wild animals, and accelerate biodiversity loss. Road networks carve up the landscape, destroy habitat, and create barriers for wary creatures like wolverines. Vehicles scare elk and other animals from accessing prime habitat. More roads will put wild animals at an even greater risk of getting killed by trophy hunters and trappers on snowmobiles, who set traps for wolves, furbearers, and any unlucky creatures from grizzlies to bobcats. It is now legal to set traps on roads closed to all but snowmobiles in Montana. More roads mean more traps and snares and a higher death toll for wild animals.

## **2. Ecological Impact**

Roadless areas protect the headwaters of the American public. They sequester carbon, buffer against climate change, help maintain healthy fish and wildlife populations, and ensure clean water for domestic, agricultural (e.g., irrigation) and industrial uses, including drinking water for tens of millions of Americans. A Montana water treatment specialist recently warned that, “Repealing the Roadless Rule would put these watersheds at risk of contamination and fragmentation, compromising the quality of our drinking water.” In essence, roads increase contamination while simultaneously reducing the ecosystem’s ability to remove that contamination. The consequences? “More treatment, more chemicals, more backwashing, and more staff time for water treatment ... higher costs for ratepayers ... more risks to public health, especially in communities without the resources for advanced filtration systems” (Rigby, Sept 10, 2025). Also, more roads increase pollution, spread weeds and microplastics, shed toxic chemicals from tires and engines, and leave behind oil, gas, garbage, and discarded machinery. Additional roads will choke waterways. They erode into creeks and streams, smothering trout spawning gravels and suffocating aquatic life.

## **3. Wildfire Mitigation**

The administration’s claims that the Roadless Rule impedes timber sales, wildfire prevention and forest management have no grounding in reality and are without scientific merit. For example, internal documents of the Montana Forest Services indicate that “reduction in annual harvest from the creation of roadless areas was likely to amount to less than 1% of the state’s historic timber harvest” (Drew, Aug 28, 2025). Over 360,000 miles of Forest Service roads already exist, maintained at taxpayers’ expense, providing access for logging, recreation, and forest health management. Studies have shown that most wildfires start in the vicinity of roads. Research conducted by The Wilderness Society found that “wildfires are nearly four times more likely to start in forest areas that have roads, in comparison with roadless areas” (Lundquist, June 24, 2025). Roads bring people. People start fires. It has been estimated that 85% to 94% of all wildfires are human-caused. Opening forests to logging further exacerbates fire intensity. Finally, it is climate change that increases the risks of wildfires. Constructing more roads and destroying some of the last contiguous forests will do nothing but further increase the risk for and intensity of wildfires.

In conclusion, rescinding protection of these beautiful landscapes amounts to the single largest rollback of conservation successes in our history, a move that would be tragic and devastating for the public and wild animals alike. These are not just forests. They are refuges for rare and sensitive species, sacred spaces for Indigenous peoples, and sanctuaries where people find solitude, joy, and beauty. Being in nature and knowing that at least some areas are still protected from human invasion is essential for our mental health. Instead of building even more roads, those roads that already exist should be utilized more efficiently for managing wildfires and forest health.

These are wild lands owned by the American public. They are the homes of wild animals. Our public lands are not for sale. We absolutely oppose this reckless handout to corporations for them to exploit at the expense of the American public and wild animals. Particularly in the era of climate change, we should not mindlessly destroy but protect all remaining wild lands.

Sincerely,

Connie Poten (co-founder and board president) and Anja Heister, PhD. (co-founder and advisory board member) of Footloose Montana, Missoula, Montana