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October 5, 2026

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

Re: Docket Number FS-2025-0001 – Special Areas; Roadless Area Conservation

Dear Acting Director White:

The California Farm Bureau appreciates the opportunity to comment on the United States Forest Service's (Forest Service) proposed rule to rescind the 2001 Roadless Area Conservation Rule (2001 Roadless Rule) and the draft environmental impact statement (EIS). Over 4 million acres, or about 20% of national forest lands in California are included in Inventoried Roadless Areas (IRAs).

California Farm Bureau is California's largest farm organization, comprised of 54 county Farm Bureaus currently representing approximately 23,000 agricultural, associate, and collegiate members in 57 counties. As an organization, we strive to improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable food and fiber supply through responsible stewardship of California's resources.

Forest health is extremely important to the success of California's agriculture industry. Home to 18 national forests covering approximately 20 million acres, California's forests store and filter more than 60% of the state's water supply. California farmers, ranchers and foresters also live and work among National Forest system lands with many engaging in public lands forestry and ranching activities. These farming, forestry and ranching families are directly impacted by National Forest System land management planning, management and regulatory requirements.

California Farm Bureau supports the proposal's intent to reduce regulatory burden and return management of IRAs to the land management planning process at the localized national forest level. This approach will provide responsible officials with flexibility to better guide management, respond to changing local resource conditions, and address rural community needs. As the Forest Service works to finalize a rule and EIS, we also offer the following specific comments for consideration:

Localized, Enhanced Decision Making
California Farm Bureau supports the proposal's management flexibility intentions and the return to localized decision making based on current conditions and management needs. Local forest managers, working collaboratively with Tribes, State and local communities, are best positioned to understand the unique resource conditions and community needs within their jurisdictions. We believe this will also result in better achievement of active management to respond to changing conditions as well as the Forest Service's multiple-use mission. With this shift in approach, as well as the localized approach of the recent proposed Travel Management Rule, we strongly urge the Forest Service to ensure adequate staffing so land management planning is adequately resourced.

Additionally, given the potential impacts on rural economies, we appreciate the proposal's intent to reduce regulatory burden. As such, we urge the Forest Service to ensure that the new localized process allows for timely decisions, transparent standards, documented analysis and opportunities for affected agricultural multiple-use operations to provide meaningful input. Agricultural operators routinely working on National Forest System lands possess valuable knowledge and their participation can greatly assist Forest Service personnel.

Addressing Wildfire Risk & Forest Health

The 2001 Roadless Area Conservation Rule established a single, nationwide set of prohibitions intended to provide lasting protection for inventoried roadless areas within the National Forest System in the context of multiple-use management. With limited exceptions, this has generally led to a prohibition on road construction, road reconstruction and timber harvested in these areas. It has also limited the ability of the Forest Service to conduct vegetation management within IRAs, contributing to broader active management, forest health and wildfire risk concerns.

National Forests in California have been deeply impacted by wildfire. From 2000 to 2011, nearly 10% of the forestland managed by the Forest Service was consumed by wildland fire. That number jumped to 38% from 2012 to 2021. The proposed rule also identifies approximately 9.8 million acres of IRAs within the wildland-urban interface. These statistics illustrate that many rural communities are facing serious public safety threat.

Forest management decisions should be based on current risk, forest conditions, and the needs of the individual landscape. We support the Service's examination of the one-size-fits-all approach as we believe it constrains officials from exercising timely, place-based and resource-based decisions. The changing conditions across the 18 national forests in California require a more active management approach.

Continued and Additional Access for Multiple-Use

The ability to construct, reconstruct, maintain, and strategically locate roads is essential to the Forest Service's multiple-use mission. Roads provide access for wildfire prevention activities, wildfire suppression, forest management, recreation, livestock management, administrative activities, and other authorized uses.

The proposed rule does not automatically authorize new roads. Instead, future projects would remain subject to National Forest Management Act land management plans, NEPA, and other laws, with projects reviewed and approved by local Forest Service officials. This distinction is important. Rescinding the national prohibition only restores flexibility, it does not guarantee roads will be constructed in all possible locations nor does it require or compel the amendment or revision of any land management plan.

Should the Forest Service consider additional roads, we urge development of transportation systems that are safe, sustainable, appropriately sized, and responsive to multiple-use needs. Interactions among uses should also be considered.

Livestock Grazing

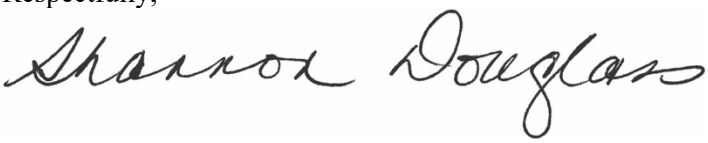
The Forest Service should ensure that future transportation and land-management planning specifically considers maintaining and improving reasonable access for livestock permittees. Restrictions on road access often creates practical difficulties for livestock permittees who need reliable access to grazing allotments, stock, fences, water developments, range improvements, and other permitted facilities. Appropriately managed and targeted grazing contributes to the reduction of fine fuels and complements mechanical treatments and prescribed fire. Repeal of the roadless rule would benefit land management through the continued and expanded use of livestock grazing.

Decisions about access should also account for the actual needs of permittees and the logistical realities of managing livestock across large and often difficult landscapes. Greater local discretion would allow the Forest Service to consider ranchers' operational needs in conjunction with other resource objectives.

Long-Term Cost and Maintenance
We encourage the Forest Service to consider the importance of adequate maintenance relative to newly constructed roads. The proposed rule appropriately recognizes that road construction is constrained by costs, terrain, budgets, and maintenance obligations and notes the Forest Service's substantial deferred road and bridge maintenance backlog. Before authorizing new permanent roads, the Forest Service should evaluate long-term maintenance responsibilities, anticipated use, emergency-access needs, resource impacts, and whether existing roads could be improved or utilized. This would help ensure that the additional flexibility created by the proposed rule produces a durable transportation system for multiple-use and management needs.

Conclusion
The California Farm Bureau appreciates the Forest Service's intention to reduce regulatory burden and return decision-making for the management of inventoried roadless areas to the individual national forest level. Thank you for your consideration of these comments and for your work managing our nation's forests. If questions, please contact Erin Huston (ehuston@cfbf.com).

Respectfully,



SHANNON DOUGLASS
President