



Bold action for birds
across the Americas

September 19, 2025

Tom Schultz
Chief
Forest Service
U.S. Department of Agriculture
1400 Independence Ave, SW Washington, D.C. 20250

Subject: Comment on the Proposed Rescission of the 2001 Roadless Area Conservation Rule FS-2025-0001

Dear Chief Schultz:

On behalf of American Bird Conservancy which works to conserve birds and their habitats throughout the Americas, please accept these comments in support of maintaining the Roadless Area Conservation Rule of 2001 which has successfully conserved wildlife habitats across the United States for the past 25 years. We urge you to please rescind the proposed rescission of the Roadless Rule.

Roadless Areas have special ecological values that benefit birds and other wildlife due to the absence of roads. These include being strongholds of relatively undisturbed interior forest habitat, and having reduced risks of vehicle strikes and noise. The Final Environmental Impact Statement found that:

The results of our evaluation highlight the value of inventoried roadless areas towards maintaining a representative network of relatively undisturbed areas that function as conservation reserves in the United States, supporting a diversity of plant and animal species. The conservation of inventoried roadless areas under the action alternatives would expand ecoregional representation, increase acreage of low elevation, biologically productive areas, and increase the number of areas large enough to provide refugia for species needing large tracts relatively undisturbed by people.¹

The Roadless Rule marks one of the most significant conservation achievements since the creation of the National Forest system. and it is important to recognize that absent the rule, current forest plans allow for two-thirds of the remaining undeveloped landscapes

¹ [Landscape Analysis and Biodiversity Specialist Report](#), November 2000, USDA Forest Service Roadless Area Conservation Final Environmental Impact Statement

larger than 5,000 acres to be roaded and logged. Roadless area protections should be maintained.

Roadless Areas are important to terrestrial vertebrates of conservation concern across many taxa: of 308 wildlife species of conservation concern (SCC)s with habitat in inventoried roadless areas, 30% are mammals, 25% are birds, 25% are amphibians, and 20% are reptiles. Seventy-seven bird SCC are provided essential habitat by National Forest roadless areas.²

States with key roadless areas for bird species of concern include Arizona (34), California (15), Oregon (4), Florida (4), New Mexico (3), North Carolina (2), Utah (1), and North Dakota (1). Arizona Woodpecker habitat in the U.S. is nearly all found in roadless areas.

Roadless areas are essential for the conservation of Northern Spotted Owl and Marbled Murrelet, California Condor, numerous migratory songbird species, Mexican Spotted Owl, Black-backed Woodpecker, Bald Eagle, Western Tanager, and Sooty Grouse. And, in Alaska, roadless areas support abundant bird populations and species such as Artic Terns, Spruce Grouse, and Northern Goshawk.

Roadless areas are also important in the eastern US where a number of bird species require quiet interior forests to thrive. These include Wood Thrush, Ovenbird, Kentucky Warbler, Louisiana Waterthrush, Hooded Warbler, and Scarlet Tanager. Maintaining the Roadless Rule ensures National Forests will continue to provide clean water, recreation, and diverse wildlife habitats beneficial to people, and essential to wide-ranging bird species.

In addition, Roadless areas protection has many important practical benefits such as providing places for birdwatching, saving downstream communities millions of dollars in water filtration costs; providing clean drinking water for millions of people, and serving as a natural barrier against the further fragmentation of the forest and the spread of invasive species harmful to dozens of bird species.

“[h]abitat in inventoried roadless areas is generally less fragmented and better connected than in roaded areas of similar size,” benefiting species such as fisher, marten, lynx, and many Neotropical birds, all of which suffer ill effects due to habitat fragmentation elsewhere.³”

Protecting roadless areas also reduces fire risks by reducing the chance of human-caused ignitions. Peer reviewed [research](#) shows that from 1992-2024, wildfires were four times as likely to start in areas with roads than in roadless forest tracts. Another [study](#) showed that more than 90 percent of wildfires occurred within half a mile of a road.

² [The importance of U.S. national forest roadless areas for vulnerable wildlife species](#), Matthew S. Dietz a, Kevin Barnett b, R. Travis Belote b, Gregory H. Aplet²

³ Roadless Area Conservation Final Environmental Impact Statement

There is a strong consensus within the scientific community about the importance of conserving the remaining roadless areas:

The national preservation of roadless areas is fundamental to safeguarding the rich biodiversity of our public lands. Roads are a primary driver of habitat fragmentation, a process that isolates wildlife populations, disrupts migration corridors, and increases the risk of local extinctions. The construction of new roads introduces invasive species, alters hydrological patterns, and increases human-caused disturbances, all of which compromise the integrity of forest ecosystems.⁴

Our concern for the loss of protected roadless areas is compounded by other administration policy changes such as the proposal to rescind the Travel Management Rule, and pending legislative proposals such as the Fix Our Forests Act which proposes to diminish safeguards for watersheds and wildlife. Another consideration is the recent order to expand timber production by 25%. Expediting procedures combined with the higher production goal put roadless areas at increased risk of unsustainable roadbuilding and logging.

To conclude, we urge you to rescind the proposed rescission, and maintain the highly-successful Roadless Areas Conservation Rule of 2001. Thank you for considering our recommendations. Please let us know if we can ever be of assistance.

Sincerely,



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⁴ [Comment by](#) Society for Conservation Biology North America (SCBNA) page one.