



Empowering all to enjoy, share, and preserve the hiking experience

The Honorable Brooke Rollins, Secretary
United States Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250-0100

Submitted via Federal eRulemaking Portal

[Docket ID: FR Doc. 2025-16581](#)

Re: American Hiking Society Comments to FR Doc. 2025-16581 Special Areas; Roadless Area Conservation; National Forest System Lands

On behalf of American Hiking Society (AHS) and the 63 million strong hiking community we thank the U.S.D.A Forest Service for the opportunity to submit comments on the proposed rescission of the 2001 Roadless Area Conservation Rule (Roadless Rule). American Hiking Society opposes the proposed rescission of the Roadless Rule as it will negatively impact the hiking community's access to and enjoyment of the 9,298 miles of hiking trails contained within roadless areas.

We provide the following comments concerning the Environmental Impact Statement (EIS) substantive issues evaluation of the proposed rescission of the Roadless Rule.

Public access to National Forest System lands, including for recreation, to facilitate subsistence or other uses, and to exercise legal rights.

EIS Must Examine and Ensure Access to and Preservation of Hiking Trails Across National Forests.

Access to and use of the 25,121 miles of trails, including 17,936 miles of non-motorized trails and 1,525 miles of congressionally designated National Scenic and Historic Trails must be protected and preserved. The ability to freely recreate on some of the most cherished and widely used public lands. In most cases, new roads through these areas—across trails and beloved open spaces—would scar the landscape and alter use for generations.

Thousands of trailheads and entry points leading to less developed, but not less valuable, areas exist in Forest Service roadless areas and are highly valued by hikers for their contribution to a quality outdoor recreational experience. Measures to prevent potentially significant effects to the

public's recreational access and experience, including hikers, should be detailed in the EIS as mitigation for the anticipated loss of natural, less developed areas that currently represent non-motorized trails in roadless areas.¹

Roadless Rule already provides flexibility for local decision makers.

The proposal indicates that the need to return decision making to the local level is a driving factor in the proposed repeal of the roadless rule. The text states that, "Local decision making and active land management benefit not only the communities that rely on national forests for jobs, natural resources, open spaces, forage, and clean water, but all citizens who utilize the multiple use attributes of national forests." and that, "This action seeks to reinstate a reliance upon the flexibility of the local land management planning process." However, the Roadless Rule already allows flexibility for necessary forest management and the construction of roads as needed to address wildfires, floods, or other catastrophic events, and other circumstances like the need to connect communities.² National Forest managers at the local level routinely conduct forest stewardship activities within roadless areas such as prescribed burning and wildlife habitat improvement activities.

Continuing deferred maintenance needs on National Forest System trails are a result of historical underfunding, not the Roadless Rule. Adding additional roads through rescission of the rule will only add to the maintenance backlog.

The notice of intent cites "continuing deferred maintenance needs on National Forest System roads and trails" and "management flexibility" needed to address deferred maintenance as justification for the proposed rescission of the Roadless Rule. The growing deferred maintenance backlog across the National Forest System is not the result of the Roadless Rule, but the result of chronic underfunding by Congress of the agency. The deferred maintenance of Forest Service roads already makes up the single biggest portion of deferred maintenance for the agency at \$5.98 billion or 55% of total deferred maintenance. Adding additional roads to the 380,000 miles network would only add to the backlog and require local decision makers to choose between maintaining trails or more costly to maintain roads.³

Over the last two decades, despite record breaking growth in visitor use, funding for our nation's forest has declined. While congress has taken action to address deferred maintenance through the National Parks and Public Lands Legacy Restoration Fund by providing the Forest Service

¹ American Hiking Society echoes and supports the recommendations made in the comments submitted by the Backcountry Horsemen of America, <https://www.regulations.gov/comment/FS-2025-0001-139969>.

² See October 24, 2018, Letter from USDA Forest Service Chief Victoria Christiansen to Regional Foresters delegating authority to them for granting exceptions to the Roadless Rule. See also

³ NATIONAL FOREST SYSTEM STATISTICS, USDA FOREST SERVICE, APRIL 2025, https://www.fs.usda.gov/sites/default/files/fs_media/fs_document/FY24-forest-system-stats.pdf

\$285M per year between 2021 and 2025, cyclical maintenance funding has remained flat or decreased. This has resulted in the maintenance backlog continuing to grow to its current estimate of \$10.785 billion.

To be clear, deferred maintenance of roads and trails was not caused by the Roadless Rule and will not be solved by rescinding the Roadless Rule. The deferred maintenance of Trails and Trail Bridges makes up a miniscule 2.8% of the maintenance backlog.

The EIS should examine whether rescission of the Roadless Rule would add more to the annual cyclical maintenance and deferred maintenance of the Forest Service if additional roads are added as a result. This is not a valid basis of justification for rescission of the Roadless Rule.

Local and regional economies

The EIS must examine the impact to rural communities reliant on the outdoor recreation economy if the Roadless Rule is rescinded. Elimination and development of roadless areas can damage outdoor recreation opportunities.

Many rural communities rely on the character and nature of the trails in roadless areas as a local economic driver. These areas attract outdoor recreation enthusiasts because of the protection of the Roadless Rule. This in turn provides greater economic benefit through lodging, restaurants, retail, and other commercial opportunities directly tied to outdoor recreation. Conventional outdoor recreation activities, including hiking, rely on access to trails and other areas within roadless areas. These activities provide an annual gross economic output of \$368 billion.⁴ Bureau of Labor Statistics data shows that "rural counties where the recreation industry is a big part of the local economy are more likely than other types of rural counties to have regained the jobs they lost during the pandemic."⁵ This is further supported by the Brookings Institution that found that traditional economic tools, which increased roads for logging is an example of, "may be ineffective compared to investments in quality of life and place. Community amenities such as recreation opportunities... are likely bigger contributors to healthy local economies than traditional 'business friendly' measures."⁶ Opening these areas to development through logging and other industrial development would benefit one traditional source of economic gain at the expense of another. Of note, in 2023, the outdoor recreation economy generated \$1.2 trillion in

⁴ BUREAU OF ECONOMIC ANALYSIS, OUTDOOR RECREATION SATELLITE ACCOUNT, U.S. AND STATES, 2023, 16 https://www.bea.gov/sites/default/files/2024-11/orsa1124_0.pdf

⁵ Sarah Melote, *Rural Counties Dependent on Recreation Industry Show Best Recovery from Pandemic Employment Loss*, DAILY YONDER (Dec. 21, 2023), <https://dailyyonder.com/rural-counties-dependent-on-recreation-industry-show-best-recovery-from-pandemic-employment-loss/2023/12/21/>.

⁶ Austin, et al., *Improving quality of life—not just business—is the best path to Midwestern rejuvenation*, BROOKINGS (Jan. 26, 2022), <https://www.brookings.edu/articles/improving-quality-of-life-not-just-business-is-the-best-path-to-midwestern-rejuvenation/>.

economic output, accounting for 2.3% of the nation's GDP and employed 5 million workers, while the logging industry generated approximately \$15.7 billion in revenue and employed about 49,700 workers.

We echo the recommendation of our fellow non-motorized trail users in the comments submitted by the Backcountry Horsemen of America that, “the EIS should include data and analysis that characterize trends and current use levels associated with outdoor recreational opportunities in national forest Roadless Areas. Such activities include hiking, backpacking, hunting, angling, horseback riding, climbing, bird watching, mountain biking and off-highway vehicle use. The EIS should cite relevant studies to identify national recreational use trends and any current unmet demand in the provision of recreational opportunities throughout the National Forest System. Data on recreational use and trends should be tabulated in the EIS in a format that facilitates identification of current and future anticipated unmet demand for each recreational use.”⁷ Impacts to current and future use levels as a result of the rescission of the Roadless Rule.

Thank you for the opportunity to provide these comments. For additional information, please contact Tyler Ray, Senior Director for Programs and Advocacy, tray@americanhiking.org.

⁷ BCHA, Comment Letter on Notice of Intent to Prepare an Environmental Impact Statement: Special Areas; Roadless Area Conservation; National Forest System Lands (Sep. 16, 2025) <https://www.regulations.gov/comment/FS-2025-0001-139969>.