September 19, 2025

Via www.regulations.gov

United States Department of Agriculture
United States Forest Service
Attn: Brad Kinder, Acting Director, Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250–1124

Re: Safari Club International Comment on the Notice of Intent to Prepare an Environmental Impact Statement on a Proposed Rule to Rescind the 2001 Roadless Area Conservation Rule (2001 Roadless Rule); 90 Fed. Reg. 42179

Dear Mr. Kinder:

Safari Club International ("SCI") appreciates the opportunity to comment on the Notice of Intent to prepare an Environmental Impact Statement ("EIS") on a proposed rule to rescind the 2001 Roadless Area Conservation Rule ("2001 Roadless Rule"). SCI is dedicated to the sustainable use and conservation of wildlife and their habitats. Rescinding the 2001 Roadless Rule will affect wildlife habitat, abundance, and hunting opportunities. The specific effects will depend on the location and how the local agency staff implement the public land policy in the future. SCI encourages the United States Forest Service to consider the conservation of wildlife populations and habitat and promotion of hunting access in its decision-making, as directed by the John D. Dingell, Jr. Conservation, Management, and Recreation Act ("Dingell Act"), 16 U.S.C. §§ 7911-7915.

Safari Club International

SCI, an I.R.C. § 501(c)(4) nonprofit organization, represents more than 100,000 members and advocates worldwide. SCI has thousands of members who live and hunt on National Forest Lands. In addition, hundreds of SCI members are professional hunting outfitters and guides who operate on Forest Service lands.

SCI's missions include the conservation of wildlife, protection of the hunter, and education of the public concerning hunting and its use as a conservation and wildlife management tool. SCI works closely with the Forest Service and other federal agencies to implement the Dingell Act and ensure that federal lands are properly managed to protect habitat, promote healthy wildlife populations, and ensure the most extensive hunting access available.

SCI Comments on Notice of Intent

Wildlife, Habitats, and Forest Health: The Forest Service has a statutory obligation to promote healthy habitats and wildlife populations in evaluating withdrawal of the 2001 Roadless Rule. Good forest management means good wildlife management.

The 2001 Roadless Rule has positively and negatively impacted wildlife and habitats. Lack of construction/reconstruction of forest roads helped prevent the micro-fragmentation of ecosystems and maintain the spatial integrity of the landscape; however, the Rule's prohibition on timber harvest within inventoried areas reduced quality habitat. Timber harvest is a critical tool in forest management. When properly implemented, timber harvest prevents nature's need for more drastic and catastrophic disturbances such as wildfires, disease, and insect infestations. Roads are an operational necessity to harvesting timber. Accordingly, SCI encourages the Forest Service to prioritize the conservation of wildlife habitat and populations in its decision-making.

Recreational Access: Like wildlife and habitat management, recreational access is a nuanced issue. The 2001 Roadless Rule's prohibition on road construction/reconstruction has limited hunting access into deep backcountry areas. While roadless areas may reduce hunting pressure and improve remoteness, such areas have cut off access completely for certain groups of hunters. SCI understands and values the benefit of remote, hard-to-access hunting grounds, but a complete prohibition on all road construction/reconstruction is not reasonable.

The 2001 Roadless Rule bars all road construction/reconstruction in inventoried areas. However, not all forest roads are equal. Roads can support different types of access, meaning not all "roads" may support timber trucks but they may support UTVs and smaller vehicles. Such roads, particularly that improve access for hunting, could be constructed/reconstructed without negating the benefits of remoteness and relatively undisturbed landscapes. Further, all roads do not necessarily need to be opened every year. Alternating openings could accommodate different recreational groups. SCI encourages the Forest Service to consider a more adaptive approach that still respects the principles of backcountry hunting in its decision-making.

SCI re-emphasizes that National Forest System lands are "open to hunting, fishing, and recreational shooting," except in limited circumstances. 16 U.S.C. § 7912. Accordingly, SCI encourages the Forest Service to take all reasonable steps to implement the Dingell Act's mandate and ensure access for America's hunters. In the event the Forest Service moves forward to assess rescinding the 2001 Roadless Rule, SCI requests that all future determinations regarding road construction/reconstruction include an explanation of how that action complies with the Dingell Act.

Local Management: SCI appreciates the Forest Service's recognition that local management can be the most effective and most efficient method of resource conservation. SCI largely supports the agency's intent to return management authority to local decisionmakers because they have

the greatest knowledge of local conditions. SCI further agrees with the agency in its rejection of a "one-size-fits-all" approach to management. Local land managers should have the discretion to tailor management to local land conditions. SCI supports development of a process that encourages coordination with states and acknowledges the need for local direction. As discussed above, however, SCI urges the Forest Service to ensure that all decision-making prioritizes wildlife and habitat conservation and maintaining or expanding public access. These are legal obligations under the Dingell Act and should be primary considerations or limiting factors for all decisions (whether made at the national or local level).

Conclusion

SCI requests that any EIS prepared to evaluate rescission of the 2001 Roadless Rule encompass (and prioritize) access for hunting and wildlife and habitat conservation described above. SCI appreciates the Forest Service's willingness to move forward and fully implement the directives of the Dingell Act.

Thank you again for the opportunity to comment on this Notice of Intent. If you have any questions, please contact Regina Lennox, Senior Litigation Counsel, at litigation@safariclub.org.

Sincerely,



Jeff Meyerl
President, Safari Club International