



Wyoming Association of Conservation Districts
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Mr. Brad Kinder
Acting Director, Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

RE: Docket Number FS-2025-0001; Notice of Intent to Prepare an Environmental Impact Statement

Submitted electronically via the Federal eRulemaking Portal

Dear Mr. Kinder,

On behalf of the Wyoming Association of Conservation Districts (WACD), thank you for the opportunity to provide comments on the proposal rescind the 2001 Roadless Area Conservation Rule (66 FR 3244, 36 CFR Subpart B (2001)). WACD serves as the collective voice of Wyoming's 34 conservation districts, which are locally led and statutorily empowered to protect and manage soil, water, and natural resources across the state.

Our mission is to provide leadership for the conservation of Wyoming's soil and water resources, promote the control of soil erosion, protect the quality of Wyoming's waters, reduce siltation of stream channels and reservoirs, promote the wise use of Wyoming's water and other natural resources, preserve and enhance wildlife habitat, protect the tax base, and promote the health, safety, and general welfare of the citizens of this state through a responsible conservation ethic.

Support for Resection of the Roadless Rule

The Wyoming Association of Conservation Districts strongly supports the proposed resection of the Roadless Rule. Since its implementation, the Roadless Rule has imposed inflexible restrictions that limit the ability of federal agencies and cooperating partners to actively manage federal lands in Wyoming. By removing the rule, federal land managers and cooperating agencies will regain the necessary tools to implement site-specific, science-based management practices that are vital to sustaining forest health,

safeguarding watersheds, and preventing catastrophic natural events such as large-scale wildfires.

In Wyoming, where vast acreages of federal land exist, the Roadless Rule has had tangible consequences. It has constrained management responses to widespread bark beetle infestations, particularly in the Medicine Bow National Forest. Beetle-kill has left behind millions of dead and downed trees, creating hazardous fuel loads that increase the intensity and spread of wildfires. Without the flexibility to thin stands, remove hazard trees, or improve access for firefighting, communities, watersheds, and ecosystems remain at significant risk.

Protecting Soil, Water, and Watersheds

WACD has a statutory responsibility to conserve Wyoming's soil and water resources. Healthy watersheds are critical to both local communities and downstream users across the region. Under the Roadless Rule, restrictions have made it difficult to carry out the very practices that protect water quality and reduce erosion.

The devastating Mullen Fire of 2020 in the Medicine Bow National Forest illustrates the consequences of limited management tools. The fire burned more than 176,000 acres, severely impacting the North Platte River watershed, which supplies critical drinking water, agricultural irrigation, and recreational opportunities for Wyoming residents and downstream communities in Nebraska. Ash, sediment, and siltation following the fire degraded water quality and increased long-term restoration costs. Removal of the Roadless Rule will make it possible to implement targeted forest health treatments that reduce these risks and better safeguard soil and water resources.

Similarly, in western Wyoming, headwaters of the Snake River and its tributaries are essential for fisheries, agriculture, and recreation. Proactive management such as selective thinning, invasive species control, and access to improvements is necessary to maintain water quality and ecosystem health. Restrictions under the Roadless Rule often prevent these common sense, science-based practices from being carried out effectively.

Preserving Wildlife Habitat and Ecosystem Health

Conservation districts in Wyoming work extensively to support and enhance wildlife habitat across working landscapes. Healthy forests and rangelands are essential to sustaining species diversity, migration corridors, and critical habitats. Restrictions under the Roadless Rule have limited the ability to implement projects such as invasive species control, habitat restoration, and vegetation management, all of which are vital to ecosystem resilience.

For example, mule deer and elk rely on seasonal migration routes that pass through forested areas needing active management. Invasive species such as cheatgrass, which spreads rapidly following fire, threaten both wildlife habitat and rangeland health. Local districts have worked with federal and state partners to control these threats, but the Roadless Rule has often created barriers to implementing treatments at the necessary scale. Removal of the rule will enhance opportunities to restore riparian areas, improve forage conditions, and maintain habitat for big game, sage grouse, and countless other species that are central to Wyoming's cultural and economic identity.

Respect for Local Input and Private Property Rights

As cooperating agencies, Wyoming Conservation Districts value the importance of meaningful collaboration in federal decision-making. Conservation districts represent local communities, landowners, and resource users who are directly impacted by federal policies. Removal of the Roadless Rule supports the integration of local voices, knowledge, and priorities into federal land management decisions.

This approach not only respects the rights of private property owners but also fosters stronger partnerships that lead to more durable and effective outcomes. Local conservation districts bring practical, science-driven expertise and an understanding of Wyoming's unique landscapes, expertise that is critical to responsible federal decision-making. The cooperating agency framework exists to ensure that federal decisions reflect both local knowledge and national priorities; the resection of the Roadless Rule reinforces the integrity of this process.

Reducing Risks to Public Safety and Local Economies

The inability to adequately manage federal lands under the Roadless Rule has increased risks to public safety, particularly with respect to wildfire. Catastrophic fires jeopardize lives, property, infrastructure, and natural resources, while also creating significant financial burdens for local governments and taxpayers. In addition to the Mullen Fire, recent wildfires in the Shoshone and Bighorn National Forests demonstrate how unmanaged fuel loads create unsafe conditions for both residents and first responders.

Beyond safety, restrictions on resource management have also limited opportunities for multiple use, including grazing, recreation, timber harvest, and other economic activities that sustain Wyoming's rural communities. Forest products industries that once supported local economies have been significantly curtailed, leaving both economic and ecological costs behind. By restoring management flexibility, the removal of the Roadless Rule will strengthen the resilience of both ecosystems and local economies.

Conclusion

The Wyoming Association of Conservation Districts respectfully urges the agency to move forward with resection of the Roadless Rule. Doing so will restore the ability to implement proactive, science-based management that addresses management issues such as beetle-kill infestations and reduce the risk of catastrophic wildfire. It will protect soil, water, and watershed health in critical watersheds such as the Colorado, North Platte and Snake River systems. It will enhance wildlife habitat and ecosystem resilience across critical migration corridors and rangelands. All while, reducing risks to public safety, respecting private property rights, and strengthening the role of cooperating agencies. Finally, it will support multiple-use principles that sustain Wyoming's working landscapes and rural economies.

We appreciate the opportunity to provide comments on this important rule making. WACD looks forward to continued collaboration and stands ready to provide additional input or technical expertise as the process moves forward.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ryan Fieldgrove". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ryan Fieldgrove
President | Wyoming Association of Conservation Districts