



KFSC Comment on Roadless Rule DEIS, October 2026

October 5, 2026

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

Submitted online at <https://www.federalregister.gov/documents/2026/08/20/2026-16965/special-areas-roadless-area-conservation#open-comment>

Re: 2001 Roadless Area Conservation Rule Rescission Draft EIS - RIN 0596-AD66

Dear Director,

The Kootenai Forest Stakeholders Collaborative offers the following comments relating to the draft EIS on the proposal to rescind the existing 2001 Roadless Rule:

The Kootenai Forest Stakeholders Collaborative (KFSC) was founded in 2006. Our mission is to help craft solutions for public lands management by representing diverse values while providing a venue for productive inclusive dialogue between the U.S. Forest Service and the community. KFSC members are comprised of a diverse group of forest users: hunters, hikers, loggers, timber industry representatives, conservationists, business owners, local government officials, educators and citizens at large. Our group has received recognition for achievement while being awarded the 2025 Montana collaborative of the year by the Montana Forest Collaboration Network which represents approx. 30 forest collaborative groups across Montana.

Regarding the proposed Alternatives, we are unable to come to a consensus on support for any of them as written.

We oppose Alternative 1 No Action.

This alternative would leave the existing rule in place. It does not change the current status of the Roadless Rule on these lands. We believe the rule could be significantly improved by amendments to allow greater management flexibility, especially near the Wildland Urban Interface (WUI) and other areas that local managers believe are of higher resource value to local communities.

We oppose Alternative 2 Full Rescission.

Rescinding the rule would reduce protection on some 44 million acres of public lands. While a portion of these lands are suitable for active management, other areas have value as wild places. We believe that the values of some of these roadless lands as wild places far exceeds their suitability or economic value for active forest management.

We also do not favor Alternative 3 – Modified Rule.

Although this Alternative addresses the important need to apply sound forest management to National Forest lands that have been neglected for 25 years, it does so in an arbitrary process. It does not empower local decisions on what areas do and do not deserve active management or continuing protection.

There is widespread support throughout the West to reduce fire risk and promote responsible active forest management on public lands, especially near communities. We encourage the ability to create amendments, revise the Roadless Rule, or both, to be allowed within forest plan revisions to capture what local stakeholders believe is important. This will allow active management in selected roadless areas to support these efforts, based on sound forest management practices, site specific WUI designations, Community Wildfire Protection Plans, and other local knowledge.

We agree that some IRAs include areas where active forest management and road building are suitable, including some cases where roads have already been constructed to support past forest management actions. Active management in such areas promise net benefits to our communities and our nation. However, we believe changes to the Roadless Rule should empower local collaboratives, local units of government, and USFS officials to determine forest management options for existing roadless lands. The collaborative consensus model has helped to reduce conflict and gridlock in public lands management over the past few decades by supporting a more balanced, common-sense approach.

Thank you very much for the opportunity to provide comment.

Tim Dougherty / Zach Angstead

Co-Chairs

Kootenai Forest Stakeholders Collaborative