

September 21, 2026

The Honorable Brooke Rollins
Secretary of Agriculture
United States Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

Dear Secretary Rollins:

I write to reiterate our opposition to the proposed wholesale rescission of the 2001 Roadless Area Conservation Rule (Roadless Rule) that prohibits new road construction and commercial timber harvesting in inventoried roadless areas (roadless areas). For 25 years, the Roadless Rule has protected drinking water, wildlife habitat, and world-class recreation opportunities across millions of acres in every national forest in California. Roadless areas reduce the potential occurrence of wildfires, cost less to manage, and provide tremendous benefits for Californians. Accordingly, I question the purpose and need for this significant proposed rule change.

The Roadless Rule protects 4.4 million acres of California forest lands from new road construction and commercial timber harvesting. These lands span 20 national forests, including lands around Mount Shasta and the Trinity Alps, across the Sierra Nevada and Tahoe region, along the Central Coast in Los Padres National Forest, and in Southern California's San Gabriel, San Bernardino and San Jacinto mountains.

California's national forests act as the state's natural water infrastructure, supplying nearly two thirds of California's total water supply. Roadless forest lands anchor the headwaters of the Smith, Eel, Sacramento, San Joaquin, American, and Kern Rivers, through which more than 11 trillion gallons of water flows every year. The value of the water produced by California's national forests is estimated at roughly \$3.2 billion annually, and sustains our multi-billion-dollar agricultural, technology, and energy economy.

Roadless areas are foundational to our state's outdoor recreation economy that generates over \$81 billion and supports hundreds of thousands of jobs across the state.ⁱ California's national forests host 33 million visitors annually, sending hundreds of millions of dollars into rural gateway communities. Hotel and local sales tax revenue funds essential rural

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municipal services and infrastructure that many counties in California could not otherwise afford. The Roadless Rule also protects thousands of miles of hunting, fishing, hiking and mountain biking trails and hundreds of miles of paddling and rafting runs, which allow recreational economies throughout the state to thrive. Our outdoor economy would undoubtedly be impacted if these roadless areas are developed for timber, mining, or oil and gas leasing.

The Roadless Rule does not ban firefighting or fuel reduction activities in our national forests. Agencies retain authority to remove trees, clear brush, and construct temporary emergency access roads if the U.S. Forest Service determines that there is a threat to that public safety. Local managers frequently conduct thinning, remove small-diameter trees and underbrush, and execute prescribed burns within roadless areas—particularly along existing boundaries where ignitions are most likely. More than 240,000 acres of roadless land in California have undergone vegetation treatments to reduce wildfire risk and protect nearby communities. For example, in the designated roadless area of Caples Creek, fuels management work helped shield communities during the 2021 Caldor Fire. This is one of over two thousand vegetation management and wildfire resilience projects completed or underway across the state.

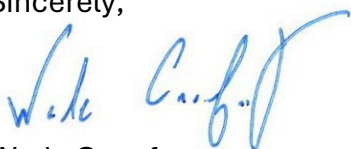
The rescission of the rule improbably relies on an assumption that it would reduce wildfire. The opposite is true. Research shows that when new areas are opened to roads, wildfires are more likely to occur. Recent research demonstrates that wildfires are four times more likely to start near roads than in roadless areas.ⁱⁱ Human-caused ignitions, primarily driven by proximity to roadways, are the state's main wildfire threat to communities, with national forest lands bordering rural and highly urban areas alike at greater risk because of these roadways. By limiting road construction, the Rule protects remote areas from campfires, cars and trucks and equipment sparks.

While greater access can aid fire response and prevention work, the potential to increase fire risk must be carefully weighed and considered prior to rescinding the Roadless Rule. In 2024, fires in California cost the state at least \$250 billion. Opening inventoried roadless areas to road construction, clear-cut timber harvest, and mining may put rural communities at increased risk of fire and significantly increase the firefighting costs of California. We cannot afford to ignore the potential costs of more fires that could result from rescinding the roadless rule.

Additionally, we cannot afford to create new burdens and expectations on an already financially constrained federal agency. As it stands now, maintenance of the existing national forest road network is significantly backlogged and the funding concerns and budget constraints described in the original 2001 rule have only grown more severe since the rule's adoption.

Finally, it's worth noting that the proposed rescission of the Roadless Rule is deeply unpopular among Californians. Ninety-nine percent of the 600,000 comments submitted in response to the initial announcement of the proposed rescission supported the Rule. Despite the significant amount of public consultation that went into the 2001 Roadless Rule, this Administration has provided Californians with minimal time to comment on the upending of a rule and practice that has been in place and working well for 25 years. California and the United States Department of Agriculture, and its United States Forest Service, have long enjoyed a cooperative relationship to sustain the health and productivity of the federal forest lands in California. Rather than advance this sweeping removal of safeguards, we need to utilize processes that respect science, state priorities, and community resilience. California stands ready to engage through our longstanding federal-state partnership — but we will not accept a federal rollback that harms the outdoor recreation economy and the rural communities that depend on it, and increases fire risk, costs, and ecological harm.

Sincerely,



Wade Crowfoot
Secretary, California Natural Resources Agency

ⁱ Outdoor Recreation Satellite Account, Bureau of Economic Analysis, U.S. Department of Commerce (2023) California, (<https://apps.bea.gov/data/special-topics/orsa/summary-sheets/ORSA%20-%20California.pdf>).

ⁱⁱ Aplet, G.H., Hartger, P. & Dietz, M.S. Three-decade record of contiguous-U.S. national forest wildfires indicates increased density of ignitions near roads. *fire ecol* 22, 8 (2026). (<https://doi.org/10.1186/s42408-026-00450-2>).