

## Keep the Roadless Rule

We are writing on the behalf of the more than 2,000 members of the Sangre de Cristo Audubon Chapter in Northern New Mexico to express our strong opposition to and dismay at the U.S. Department of Agriculture's proposed rollback of the Roadless Rule as it applies to nearly 45 million acres of the 61 million acres of inventoried roadless areas in the National Forest System. The National Forest System already contains 380,000 miles of roads – that's EIGHT times the mileage of the Interstate Highway System. Yet, the agency wants more.

There are approximately 1.6 million acres of Inventoried Roadless Areas in New Mexico, the equivalent of the entirety of Santa Fe National Forest. Living as close to Santa Fe and Carson National Forests as we do, we strongly believe that further road building in the roadless areas will degrade watersheds and water quality and actually increase the risk of wildfires in our national forests.

Advocates for building roads in these roadless areas have claimed that more roads will reduce the risk of wildfires. This claim is disingenuous and false. Research has shown roads increase human activity and hence the risk of wildfires. New research from The Wilderness Society (now in peer review) indicates that from 1992-2024 wildfires were four times more likely to start in areas with roads than in areas without roads. Another study found that 90 percent of wildfires start within a half mile of a road.

The Roadless Rule does not prevent the Forest Service taking steps to reduce wildfire risk in Roadless Areas. The rule explicitly allows the Forest Service to take steps to reduce fuel loads in Roadless Areas where the risk demands attention.

It is ironic – indeed, cynical - that USDA is proposing more roads in the National Forests, thereby increasing the wildfire threat at the same time that it is slashing budgets for wildfire mitigation and personnel. The Forest Service has the tools to mitigate wildfire risks; what it needs is a budget that enables it to reduce the risk of wildfires, not more roads.

A second major impact of the repeal of Roadless Areas will be the degradation of watersheds, stream flows, and community water supplies. Roads often lead to erosion, sedimentation, and contamination of public watersheds and drinking water. Bringing roads into these roadless could pose a threat to public drinking. Santa Fe National Forest provides 40 percent of the drinking water for 180,000 New Mexicans. Without money for regular road maintenance, roads will deteriorate leading to erosion and leaving roads unusable.

The USDA's underlying motivation for revoking the Roadless Rule is to increase timber harvests, mining, and oil and gas drilling. Increases in these activities will increase wildfire risk, degrade the quality of community water supplies, and harm threatened and endangered species.

Lastly, fragmentation of habitats by roads also will create yet another impediment to the recovery of numerous species of wildlife whose lifecycles depend on large tracts of unbroken land. In addition, such unbroken stretches are vital to the health of commercial fisheries and the economic viability of communities that depend on the outdoor recreation economy. Moreover, a large tracts of roadless lands are necessary for the recovery of critically endangered species, such as the Mexican gray wolf in New Mexico's Gila National Forest .

The Roadless Rule was adopted 25 years ago after 600 public meetings and listening sessions and more than 1.6 public comments supporting the rule. More recently, 70 House and Senate members have co-sponsored legislation to place the Roadless Rule into statues. For the USDA to take steps to repeal the Roadless Rule without adequate opportunity for public participation and comment ignores science, history, and public opinion. We urge you to withdraw this ill-considered proposal and to keep the Roadless Rule in force.

Respectfully,

The Sangre de Cristo Audubon Board of Directors

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