

August 29, 2025

U.S. Department of Agriculture, Forest Service
Director, Ecosystem Management Coordination
201 14th Street SW
Mailstop 1108
Washington, DC 20250-1124

Re: Request for Extension of Comment Period on the USDA Forest Service's Notice of Intent to Develop an Environmental Impact Statement for Proposed Recission of the 2001 Roadless Rule, Docket Number FS-2025-0001

Submitted electronically via <https://www.regulations.gov/docket/FS-2025-0001>

To Whom it May Concern:

The undersigned organizations are heavily invested in the responsible stewardship of National Forest System lands in the State of New Mexico and across the country. On behalf of our thousands of members and supporters, we respectfully request that you extend the comment period for the above-referenced notice of intent to a minimum of sixty days. This extension will accommodate the fact that the current comment period provides only three weeks for the public to evaluate and weigh in on the proposal, from August 29, 2025, through September 19, 2025.

The requested extension is critical to allow stakeholders an adequate opportunity to be heard. Interested organizations, state and local governments, individuals, communities, and sovereign Pueblos and Tribal Nations are entitled to a reasonable opportunity to consider the implications of this extraordinary change to longstanding U.S. Forest Service regulations. For almost twenty-five years, the 2001 Roadless Rule has prohibited new road building and commercial timber harvest within Inventoried Roadless Areas of our National Forest System lands, subject to the existing common-sense exceptions for necessary forest management to address things like fires, floods, and other catastrophic events, as well as other circumstances like the need to connect communities.

Despite the short length of the comment period, this regulatory change implicates a web of complex scientific, legal, and policy issues demanding considerable scrutiny that will take time to analyze. Issues that interested parties will need to consider include, but are not limited to:

- Public resources and values present on the nearly 45 million acres of Inventoried Roadless Areas affected by the proposed recission, which comprise almost a quarter of our National Forest System lands, including approximately 1.6 million acres in New Mexico;

- The best available science addressing the complex relationship between forest roads, wildland fire, and water resources, including New Mexico's critical drinking water supply;
- Impacts on imperiled wildlife, wildlife corridors, and wildlife habitat;
- Impacts to outdoor recreation opportunities in roadless areas, including hunting, fishing, hiking, camping, paddling, climbing, and horseback riding, and on our growing outdoor recreation economy, which contributed \$3.2 billion in value and 29,182 jobs to New Mexico in 2023;
- The cost to taxpayers of maintaining the existing National Forest System roads and the anticipated fiscal impacts of new road building and maintenance on National Forest System lands;
- Impacts to Pueblos and Tribal Nations that are affiliated with cultural landscapes located within Inventoried Roadless Areas;
- Impacts to traditional communities and institutions in New Mexico that rely on National Forest System lands, including land grant-mercedes and acequias; and
- Other impacts on cultural, historical, and archaeological resources.

We appreciate your consideration of this request and urge you to extend the comment period to a minimum of 60 days as soon as practicable, with a deadline of October 29, 2025, or later. This will ensure the interested public has a full and fair opportunity to comment on these important issues prior to the agency's preparation of an environmental impact statement.

If you have any questions regarding this request, please contact Sally Paez, Staff Attorney at New Mexico Wild, sally@nmwild.org.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Sally Paez", is written over a horizontal line.

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