



SAN JUAN COUNTY COMMISSION

Silvia Stubbs	Chair
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September 16, 2025

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

Re: Proposed Rule for Recission of 2001 Roadless Rule

Dear Director:

San Juan County supports the preparation of an EIS to analyze the effects of a proposed rule to rescind the 2001 Roadless Rule.

In San Juan County, Inventoried Roadless Areas encompass almost 30% of USFS lands. Some of these areas would benefit from more active forest management which is currently hindered or prohibited by Roadless Rule restrictions.

We support rescinding the Roadless Rule because it prohibits road construction that may be needed to facilitate forest management and authorized multiple uses. Its restrictions on timber harvest and management make timber and woodland management more difficult or impossible. These prohibitions and restrictions create unhealthy forest conditions which make these Inventoried Roadless Areas ripe for potential catastrophic wildfires.

The "one size fits all" approach to Inventoried Roadless Area management is not appropriate as it limits discretionary actions local forest managers may need to effectively manage forest health and reduce the potential for wildfire. Forest conditions of the past decades since implementation of the Roadless Rule are expected to continue including the effects of climate change, local droughts and resultant insect and disease infestations. These conditions will need appropriate actions to maintain or restore healthy forest conditions. Such actions would be hindered or prohibited by the current Roadless Rule.

We support rescinding the Roadless Rule and giving local forest managers more discretion in selecting appropriate measures for healthy forest management in consultation with State and local governments.

Sincerely,

Silvia Stubbs
Commission Chair