



Native Plant Society of New Mexico

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RE: Rescission of Roadless Area Conservation Rule (RIN 0596-AD66)

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Please accept the following comments from the Native Plant Society of New Mexico (NPSNM), which urges the United States Forest Service (USFS) to not rescind the Roadless Area Conservation Rule (Alternative 1, “no action”).

The Native Plant Society of New Mexico strives to educate the public about native plants by promoting knowledge of plant identification, ecology, and uses; fostering plant conservation and the preservation of natural habitats; supporting botanical research; and encouraging the appropriate use of native plants to conserve water, land, and wildlife. The Society and its members have been actively involved in rare plant conservation efforts in New Mexico, and our members use and enjoy the public lands throughout New Mexico including areas designated as Roadless Areas in the Santa Fe, Gila, Carson, Cibola, Coronado, and Lincoln National Forests.

The NPSNM supports Alternative 1 from the draft NEPA review, to keep the existing 2001 Roadless Area Conservation Rule (Roadless Rule) in place (36 CFR Part 294, Subpart B (2001); 66 FR 3272). Leaving the Roadless Rule in place would best protect areas of high conservation value within our national forests. As human populations spread, unfragmented forest areas are increasingly important for native plants and wildlife to survive. Inventoried roadless areas encompass some of the State’s least fragmented remaining habitats and harbor many rare plant species. Increasing road building would both directly and indirectly harm rare plant habitat and would open areas to further surface-disturbing activities from logging, mining, and recreation.

The Roadless Rule prohibits road construction and reconstruction, and timber harvest with limited exceptions. These exceptions – to protect public health and safety in the case of imminent threat, such as floods and wildfires – already allow the Forest Service to achieve many of the goals of the proposed rescission, including wildfire management when needed and local control of roadless areas, but do so using a scalpel rather than a chainsaw. The Roadless Rule also includes an exception for timber thinning to improve threatened, endangered, proposed, or sensitive species habitat; or to maintain or restore the characteristics of ecosystem composition and structure. This rule does the most to protect large

areas of national forest for plants, wildlife, and recreational uses, while still allowing limited human intervention in protected roadless areas on a forest-by-forest, case-by-case basis.

Alternative 2 rescinds the rule. Alternative 3 significantly reduces the boundaries of roadless areas by redefining “roadless”. We do not support either of these alternatives, as both would result in much more fragmentation of our national forests. These other alternatives would also increase the need for further environmental review, interagency coordination, avoidance measures, and mitigation by the Forest Service and its partners, increasing administrative burden for federal and state agencies.

Alternative 1 offers the best support for the following:

- **Biodiversity:** Alternative 1 best preserves large, intact habitat and habitat connectivity. It reduces edge effects and disturbance that can negatively impact plants and animals. It best preserves migratory routes for animals and seed dispersal pathways for plants.
- **Endangered and sensitive species:** Although the other two alternatives would still consider endangered and sensitive species requirements, with the change in the definition of harm under the Endangered Species Act, the impacts of habitat changes will no longer be taken into consideration. This makes it all the more important to protect intact habitats in national forests. In the national forests of New Mexico and Arizona, 57% of threatened, endangered and proposed species can be found within or affected by roadless areas. At least 35 plant species of significant concern are located in these areas. A few imperiled species that rely on these lands are Sacramento Mountains thistle, Gooding’s onion, and Hess’ fleabane, and animals such as Mexican spotted owls, Gila trout, Mexican gray wolves, and Grace’s warblers.
- **Water Quality Degradation:** Roadbuilding and the harmful activities that come with it like logging and mining can have devastating effects on water quality and aquatic plant and animal habitat. Roads are susceptible to erosion, delivering sediment to streams and reducing water quality. With so many challenges to water resources in our state, there is no capacity for the increased sedimentation and pollutants that accompany roads.
- **Subsistence and Cultural Values:** Roadless areas and the culturally important sites they safeguard are critical to food security and cultural activities for many indigenous groups and other traditional communities, including gathering, hunting, fishing, ceremonial uses, and sustaining traditional acequias.
- **Outdoor Recreation:** Roadless areas offer abundant outdoor recreation opportunities such as botanizing, hunting, fishing, hiking, biking, camping and other activities. More than 420 miles of the Continental Divide Trail run through Inventoried Roadless Areas, including 40 miles in New Mexico. Roadless areas protect some of New Mexico’s most beloved recreation destinations, such as the Windsor Trail on the Santa Fe National Forest.
- **Climate mitigation:** Roadless areas are crucial for absorbing and storing carbon, mitigating the effects of climate change. This is especially true for roadless areas with significant stands of

mature and old-growth trees similar to, and adjoining the edges of, the mixed conifer forests of the Gila Wilderness. Rescinding the Roadless Rule would undermine all of the benefits listed above as well as endanger communities and put a financial burden on New Mexican communities and taxpayers.

- Increased risk of wildfires: The construction of new roads leads to more wildfires. Research by the Wilderness Society that analyzed data from 1992-2024 has concluded that wildfires were four times as likely to start in areas with roads than in roadless forest tracts. Another study showed that increased wildfires follow road networks and that human ignitions account for more than 84% of all wildfires. New Mexico is very vulnerable to wildfires as evidenced by numerous recent fires. We do not need more roads in our forests nor the associated increased risk of more human-caused fire starts. The Roadless Rule's existing exception that allows limited, temporary roadbuilding to aid firefighting is sufficient to balance any need for limited access related to specific fires against the greater threat of *more* wildfires arising from new, permanent roads.
- Loss of Access to Public Lands: The financial burden of building new roads in national forests falls onto the taxpayer. The Forest Service already has a 368,000-mile road system that is not properly maintained, resulting in a maintenance backlog worth billions of dollars in needed repairs. The building of more roads crossing our national forests would fall on the taxpayer to foot the bill and/or result in a functional loss of access due to fewer dollars to maintain a growing road network. New Mexicans and all Americans have the right to enjoy the benefits of the 1.6 million acres of roadless and wild backcountry lands in New Mexico and tens of millions of acres more across the country. Indeed, these benefits and the protection against harms that roadless areas provide are integral to the wellbeing of our communities statewide.

In conclusion, the NPSNM supports keeping the existing 2001 Roadless Area Conservation Rule as it does the most to protect New Mexico's impressive plant and animal biodiversity through preserving intact habitat, supporting water quality, reducing wildfire ignitions, mitigating climate, and preserving access for botanizing and hiking.

Sincerely,

A handwritten signature in dark ink, appearing to read "Sylvan Kaufman". The signature is fluid and cursive, with the first name "Sylvan" being more prominent than the last name "Kaufman".

Dr. Sylvan Kaufman
Conservation Co-Chair
Native Plant Society of New Mexico