



UTAH FARM BUREAU FEDERATION

9865 South State Street • Sandy, Utah 84070-3205 • Phone: (801) 233-3040 • www.utahfarmbureau.org

"Inspire All Utah Families to Connect, Succeed, and Grow Through the Miracle of Agriculture."

October 6, 2026

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

Submitted electronically: Federal eRulemaking Portal, <https://www.regulations.gov>

RE: Special Areas: Roadless Area Conservation, Docket No. FS-2025-0001; RIN 0596-AD66

Dear Acting Director White:

On behalf of the more than 37,000 member families of the Utah Farm Bureau Federation (UFBF), I submit these comments regarding the U.S. Department of Agriculture's (USDA) proposed rescission of the 2001 Roadless Area Conservation Rule. UFBF appreciates USDA's efforts to evaluate whether a nationwide regulatory prohibition remains the appropriate means of managing inventoried roadless areas on National Forest System lands.

UFBF previously submitted comments during USDA's scoping process in favor of rescinding the 2001 Roadless Rule. Those comments emphasized the effects of restricted access on wildfire prevention, forest health, agricultural operations, water infrastructure, wildlife management, rural economies, private property, and local decision-making. UFBF supports a forest management system that allows responsible officials to weigh local conditions and legitimate uses while meeting applicable statutory requirements.

UFBF encourages USDA to finalize the proposed rescission while emphasizing site-specific analysis, responsible access, temporary and infrequent road use where appropriate, protection of valid existing rights, meaningful coordination with the State of Utah and county and local governments, and the use of grazing, mechanical treatment, prescribed fire, timber harvest, and other appropriate tools to improve forest and watershed resilience.

UFBF's position is consistent with policies adopted by our voting delegates through our grassroots policy process. UFBF supports livestock grazing as a tool to reduce wildfire fuels;

agricultural burning and prescribed fire where appropriate; responsible timber harvest and road access on public lands; coordination among federal, state, and local agencies; protection of private property rights; and meaningful agricultural participation in land-use decisions.

I. Site-Specific Planning Should Guide Decisions

UFBF supports USDA's proposal to remove the nationwide restrictions in 36 C.F.R. part 294, subpart B, and return roadless-area decisions to the applicable forest-planning and project-review processes. This proposal does not require the U.S. Forest Service (USFS) to build roads, harvest timber, or revise a forest plan. It simply gives local USFS officials greater flexibility to consider whether a particular action fits the conditions and needs of a specific area.

That distinction matters. UFBF does not support road construction or timber harvest simply because of the Roadless Rule changes. We support the ability to consider those options when they serve a sound management purpose. Forests differ substantially in vegetation, terrain, watershed conditions, wildlife use, wildfire exposure, and proximity to farms, ranches, and communities. A single nationwide blanket restriction cannot account for every local circumstance. Forest plans and project-level review should guide decisions about access and treatment. These processes should provide USFS officials a practical way to assess proposed work, consider its effects, and select appropriate safeguards or mitigation without applying a categorical roadless-area prohibition in every case.

The purpose of forest management should be stewardship, not simply restriction. Forest management should not become a "set it and forget it" exercise, where a restrictive designation is treated as a substitute for ongoing stewardship. Forests are dynamic living systems. Their conditions change over time, sometimes rapidly, and drought, insects, disease, dense vegetation, wildfire, erosion, and changing weather conditions can alter the risks facing a particular landscape.

In forestry, inaction is itself a management choice, and sometimes a costly one. Avoiding decisions today can reduce options for managing communities, watersheds, agricultural operations, wildlife, and infrastructure when severe wildfire or other disturbances occur. Environmental review should therefore consider both the potential consequences of active management and the consequences of failing to address identified risks and opportunities.

II. Protect Agricultural Access, Private Property, and Established Uses

Utah farmers and ranchers often need to reach or cross National Forest System lands to check livestock, maintain fences and water systems, repair irrigation facilities, manage grazing areas, and access other improvements. Access also helps crews respond to fires, complete restoration work, and repair damage after a fire. When an established route is unavailable, producers may face extra costs, longer delays, or difficulty protecting livestock and infrastructure.

Federal lands often adjoin or intermingle with privately owned Utah farms, ranches, roads, and water facilities, as well as those on state lands. Federal management decisions can affect landowners' ability to access their property, maintain infrastructure, move livestock, manage water, and respond to wildfires. UFBF supports protecting private property rights and respecting valid existing rights and established agricultural uses.

UFBF asks USFS to consider these rights and uses whenever a decision could affect private land, grazing operations, water facilities, or other established uses. USFS should coordinate with affected landowners, grazing permittees, irrigation entities, counties, and Utah public land and wildlife management agencies early enough for their information to inform the decision.

UFBF also recognizes that sometimes a road can create problems if its location, use, or maintenance does not fit the landscape. Roads may contribute to erosion, spread invasive plants, disturb wildlife, or increase the possibility of human-caused fire. Project review should identify those risks and address them with appropriate design, mitigation, use limits, or closure requirements. Temporary or infrequently used routes deserve consideration when they can meet the management need while reducing lasting impacts.

III. Maintain Forest-Health and Wildfire Management Tools

Utah's devastating 2026 wildfire season highlights the consequences of severe fire conditions for forests, watersheds, agricultural operations, and rural communities. According to Utah State University Extension, more than 500,000 acres burned across Utah during the 2026 wildfire season, making it the state's most severe fire season since 2007. Three fires, the Widemouth 2, Babylon, and Cottonwood fires, ranked among Utah's ten largest wildfires since 2002. The season also brought wildland firefighter deaths, substantial structural damage and property loss, post-fire flooding, and significant livestock deaths and impacts to grazing.¹

The consequences of wildfires for Utah ranchers are not measured in burned acres alone. Wildfires can result in the loss of livestock, fencing, barns, wells, corrals, hay, and other infrastructure. Surviving livestock may suffer burns, hoof damage, respiratory injuries, and other health problems. Burned grazing lands may remain unavailable for multiple years, forcing producers to find alternative forage at a time when drought can make replacement feed scarce and expensive.

Wildfires can also cause losses that take years to recover. Replacing breeding livestock can affect the genetics and productivity of a herd for years, while rebuilding fences, water systems, and other infrastructure requires substantial time and capital. For ranchers who depend on public land grazing, the loss of a grazing allotment can fundamentally change how an agricultural operation

¹ J. Bradley Washa, Ask an Expert – Utah's 2026 Wildfire Season by the Numbers, Utah State Univ. Extension (Sept. 25, 2026), <https://extension.usu.edu/news/ask-an-expert-utahs-2026-wildfire-season-by-the-numbers>.

functions. The effects can extend well beyond the immediate fire perimeter and affect the economic health of rural communities that depend on agriculture. At a time when the national cattle herd is at its lowest level in decades, the loss of breeding livestock and productive grazing capacity from wildfire is especially concerning.

UFBF does not claim that the Roadless Rule caused any particular fire in our state this year. Rather, the 2026 season highlights the importance of building resilient landscapes and ensuring that land managers can evaluate the full range of appropriate tools. Utah's forests face a combination of drought, insects, disease, dense and overpopulated vegetation in some areas, and changing weather conditions. These factors can affect forest resilience and complicate wildfire response.

UFBF supports responsible timber harvesting on federal, state, and private lands, including roads needed for access, along with sound silvicultural practices, prescribed fire consistent with forest plans, grazing as part of multiple-use management, and other appropriate vegetation-management tools. These tools should be considered where they fit local conditions and forest management goals, rather than applied uniformly in every location.

UFBF encourages USFS to focus attention on areas where forest conditions and wildfire exposure create risks for agricultural lands, watersheds, infrastructure, and nearby communities. The aim should be to address identified needs, not to treat every acre or favor one method everywhere. Rescission of the 2001 Roadless Rule would give officials more flexibility to weigh those needs and choose an appropriate course of action.

IV. Use Grazing and Other Management Tools Where Appropriate

Livestock grazing can help reduce fine fuels and complement other vegetation management practices when tailored to site conditions and resource objectives. UFBF supports using grazing to reduce burnable fuels on private, county, state, and federal lands. We encourage USFS to consider grazing as part of its broader forest-health strategy wherever appropriate. Proactive vegetation management, practical access, and coordination with grazing permittees can help managers address forest-health concerns while accounting for the needs of livestock producers. These efforts should complement, not replace, the broader range of tools available to reduce wildfire risk and restore burned areas.

Road access is an essential aspect of grazing management. Effective grazing management also requires practical access for livestock and the infrastructure needed to support them, including water developments and fencing. USFS should consider these needs as part of its overall management approach and work with permittees to understand operational requirements and identify workable solutions. Rescinding the 2001 Roadless Rule will allow more specific coordination of grazing management.

V. Conclusion

UFBF supports USDA's proposal to rescind the 2001 Roadless Area Conservation Rule and return management decisions to applicable forest plans and responsible USFS officials.

Rescission would not require roads, timber harvest, or other treatments. It would allow USFS to consider those options, along with grazing, prescribed fire, restoration, and other practices, when site-specific conditions justify them and applicable review supports the decision.

Utah agriculture depends on workable access for livestock care, grazing, water infrastructure, property access, restoration, and wildfire response. A management framework that evaluates both the risks of action and the risks of inaction is better suited to protect forests, watersheds, agricultural operations, wildlife, infrastructure, and rural communities than a one-size-fits-all national prohibition.

UFBF encourages USDA to finalize the proposed rescission and implement it through careful site-level analysis, protection of established rights and uses, meaningful coordination with the State of Utah and local governments, and full consideration of the benefits and risks of active forest management.

Thank you for considering UFBF's comments

Sincerely,

A handwritten signature in black ink, appearing to read 'ValJay Rigby', with a stylized, cursive script.

ValJay Rigby

President

Utah Farm Bureau Federation