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August 20, 2026

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

Re: RIN 0596-AD66 - Proposed Rescission of the 2001 Roadless Area Conservation Rule

Dear Responsible Official:

Sweetwater County, Wyoming submits these comments in support of the U.S. Department of Agriculture's proposed rescission of the 2001 Roadless Area Conservation Rule and the removal and reservation of 36 CFR Part 294, Subpart B. More than 73 percent of the land within Sweetwater County is federally owned, and federal land management decisions directly affect the County's economy, public access, recreation, grazing, watersheds, natural-resource industries, wildfire protection, and the custom and culture of our communities. The County's adopted Federal Lands and Resources Plan supports multiple-use and sustained-yield management and calls for active County participation in federal planning. The proposed rescission is consistent with those policies because it would remove a single nationwide prohibition and return management of inventoried roadless areas to the applicable National Forest land management planning process. The County also recognizes that rescission does not itself authorize road construction, timber harvest, or other ground-disturbing activity; future proposals would remain subject to the governing forest plan, site-specific environmental review, and other applicable law.

The proposed action directly addresses longstanding Sweetwater County policy concerning inventoried roadless areas. Section 11.2.12 of the County's Federal Lands and Resources Plan calls for revision of Inventoried Roadless Areas in the Ashley National Forest and the Flaming Gorge National Recreation Area. Sections 13.2.11 and 13.2.12 support revision of roadless areas within or partially within the County and support State of Wyoming efforts to correct Inventoried Roadless Area classifications. Sections 21.2.2.3 and 21.2.2.4 further state that the County does not support management of additional federal lands under inventoried-roadless or similarly intended management regimes and supports removal of management provisions that elevate roadless qualities over uses consistent with multiple use and sustained yield. For these reasons, Sweetwater County supports USDA's proposed removal of the national-level prohibitions in Subpart B and the return of these decisions to forest-level planning based on actual local resource conditions.

Greater management flexibility is particularly important for forest health and wildfire management. The County's Plan supports active and adaptive forest management, vegetation treatments, stewardship projects, commercial timber harvest where appropriate, salvage of fire- or pest-affected timber, and management programs that reduce fuel loads and catastrophic wildfire risk. The Plan specifically identifies long-term disease and insect infestation and associated fuel loading in the Ashley National Forest and Flaming Gorge National Recreation Area. Sweetwater County therefore supports the proposed rule's recognition that existing roadless prohibitions can limit mechanical treatment, access, and certain wildfire-response options. Local Forest Service officials should be able to determine, through the applicable land management plan and project-level review, whether temporary access, vegetation treatment, timber harvest, or other tools are appropriate to protect communities, watersheds, recreation resources, wildlife habitat, and other public values. The County does not advocate indiscriminate road building or timber harvest; it supports retaining the full range of lawful management tools so that decisions can be tailored to site-specific conditions.

Sweetwater County also supports the additional flexibility the proposal would provide for roads and access. The County's Plan finds that access to and across federal lands is critical to resource management, recreation, grazing, water facilities, communication infrastructure, valid existing rights, and adjoining State and private lands. It opposes unnecessary road and trail closures, supports recognition of County roads and rights-of-way, and supports correction of roadless inventories that do not accurately reflect existing roads or traditional access. Accordingly, implementation of the rescission should require accurate identification of existing County and public roads, R.S. 2477 assertions, rights-of-way, and other legally recognized access before future roadless-related management decisions are made. At the same time, the County recognizes that the Flaming Gorge National Recreation Area has statutory purposes and restrictions that remain in place. Support for rescission of the 2001 Roadless Rule should not be construed as a request to alter those separate statutory limitations. Rather, the County seeks management flexibility within the authorities that actually govern each National Forest System unit.

The County strongly supports the proposal's emphasis on place-based decisionmaking informed by State, Tribal, and local communities. The final rule and decision documents should make clear that affected counties are governmental planning partners, not merely members of the general public, when roadless-area decisions are addressed through forest-plan development, amendment, or revision. Sweetwater County's Federal Lands and Resources Plan states that the County shall be directly involved in development and implementation of the Ashley National Forest Management Plan and the Flaming Gorge National Recreation Area Plan, and it calls for federal planning documents to be consistent with the County Plan to the maximum extent permitted by federal law. The County therefore requests that USDA expressly recognize the importance of coordination with affected county governments and consideration of adopted local land-use and natural-resource plans. This local coordination is especially important if a future forest plan proposes restrictions on road construction, timber harvest, or other activities that would have effects comparable to the national rule being rescinded.

Sweetwater County recognizes that land management plans may retain or adopt restrictions where those restrictions are supported by site-specific resource conditions and the applicable

planning record. However, USDA should avoid simply recreating the 2001 Roadless Rule through broad forest-level administrative designations that presume roadless character should take priority over other multiple uses. Future restrictions should be narrowly tailored and supported by demonstrated resource needs, best available information, consideration of social and economic effects, protection of valid existing rights, and meaningful coordination with State and local governments. The analysis should also consider the full spectrum of recreation. Sweetwater County supports hunting, fishing, camping, hiking, bicycling, motorized recreation, wildlife habitat, scenic resources, and healthy watersheds as components of multiple-use management. Retaining access and active-management options can benefit many of those same values, particularly where vegetation treatment, wildfire response, road maintenance, or access to public facilities is needed.

For these reasons, Sweetwater County supports finalization of the proposed rescission of the 2001 Roadless Area Conservation Rule. In the final rule and associated decision documents, the County asks USDA to preserve forest-level, place-based decisionmaking; provide meaningful coordination with affected county governments; recognize existing roads, rights-of-way, valid existing rights, and traditional access; retain appropriate tools for forest health, hazardous-fuels reduction, wildfire response, timber management, recreation, and infrastructure access; and avoid replacing the national Roadless Rule with equally broad administrative restrictions that have not undergone appropriate local analysis and coordination. The County appreciates the opportunity to comment and looks forward to continued coordination with USDA and the U.S. Forest Service concerning management of the Ashley National Forest, Flaming Gorge National Recreation Area, and other National Forest System lands affecting Sweetwater County.

Sincerely,

Sweetwater County  
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