



**NEVADA
DIVISION
OF FORESTRY**

STATE OF NEVADA
Department of Conservation and Natural Resources
Department of Wildlife
Joe Lombardo, *Governor*
Vinson Guthreau, *Director, DCNR*
Alan Jenne, *Director, NDOW*
Ryan S. Shane, *State Forester Firewarden*



October 6, 2026

United States Forest Service
Joshua White, Acting Director
Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124
<https://www.regulations.gov>

Re: 2001 Roadless Area Conservation Rule; Docket number FS-2025-0001 or RIN 0596-AD66

Dear Mr. White,

The Nevada Division of Forestry (NDF) and the Nevada Department of Wildlife (NDOW) appreciate the opportunity to comment on the U.S. Department of Agriculture's (USDA) proposed rescission of the 2001 Roadless Area Conservation Rule ("Roadless Rule").

NDF and NDOW have distinct but complementary responsibilities for managing and conserving Nevada's natural resources. NDF is responsible for supervising or coordinating forestry, rangeland, and watershed work on state and privately managed lands, including fire control, as outlined in NRS 472.040(1)(a). NDOW is charged with conserving, managing, and restoring Nevada's fish and wildlife resources and the habitats that support them. Both agencies work closely with federal agencies, local governments, private landowners, and other partners to address wildfire, watershed, forest and rangeland health, wildlife habitat, and other resource-management challenges across Nevada.

The agencies agree that meaningful state and local participation will be important to ensure that management decisions appropriately consider these interests and that opportunities for collaboration are identified early in the planning process.

Our agencies recognize the importance of providing land managers with appropriate flexibility to address current conditions, local priorities, forest-plan direction, wildfire risk, watershed protection, wildlife habitat, and public safety. However, that greater management flexibility also requires thoughtful consideration of Nevada's wildlife and habitat resources. NDOW's concerns regarding habitat connectivity, wildlife movement, invasive species, aquatic resources, and other potential resource impacts should be incorporated into project-level planning and implementation. NDF and NDOW are committed to working together, and with the USFS and other partners, to ensure that necessary management access can be provided while appropriately addressing these resource considerations.

NDF and NDOW offer the following comments on behalf of the State of Nevada:

Management and Stewardship Flexibility Supports Conservation and Resilience

Nevada's ecosystems are highly diverse, requiring nuanced management strategies to achieve desired multiple uses, values, and outcomes from USFS lands. Because of this, a broad national policy that constrains the evaluation of local actions can stifle the application of science-based management and collaborative stewardship to sustain these landscapes.

While Nevada's Inventoried Roadless Areas (IRAs) allow road construction and reconstruction under limited circumstances, such as fire suppression, hazardous fuels reduction, and access to existing rights, these provisions largely apply to existing roads rather than enabling construction of new routes necessary for effective management. Restrictions on associated economic activities, including timber sales used to improve forest health and offset wildfire hazard reduction costs, make critical management actions significantly more expensive. These limitations create significant challenges by excluding even temporary administrative use roads that are necessary for science-based stewardship out of the toolbox for land managers. As a result, treatment costs can increase five to ten times because ground-based operations are restricted and must rely on far more expensive aerial operations for management.

NDF and NDOW also recognize that effective stewardship frequently requires consideration of multiple resources simultaneously. Wildlife habitat, forest and rangeland health, watershed protection, wildfire risk, and access needs are often interconnected. The agencies therefore support a collaborative approach that allows management actions to be designed around logical treatment units, watersheds, habitat priorities, and other landscape-scale considerations. Nevada and the USFS have collaboratively selected priority landscapes on the Humboldt-Toiyabe National Forest based on shared objectives that include:

- Rangeland and Forest health and resilience
- Wildfire-risk reduction
- Watershed protection
- Wildlife habitat
- Recreation and access
- Industry capacity
- Cross-boundary implementation opportunities

These priorities should continue to inform decisions regarding where management access is necessary and where additional resource protections or mitigation may be appropriate. These priorities frequently extend beyond fixed distances from existing roads or Wildland Urban Interface (WUI) boundaries. Effective treatments may need to extend across entire watersheds, logical treatment units, or strategic access corridors to be effective. Shared Stewardship priority landscapes should be expressly factored into decisions regarding where roadless restrictions remain in effect.

Given Nevada's limited financial resources and its catastrophic wildfire challenges, which continue to outpace available budgets, as well as the pace and scale of fuel reduction and other mitigation effort, maintaining this rule adds yet another barrier to adapting ecosystem management in ways that curtail destructive wildfire patterns and safeguard ecosystem health and function.

Wildfire Prevention and Response Can Be Improved

Roads are indispensable for timely wildfire initial attack, especially when aerial resources are unavailable. Access often determines whether a fire remains small or becomes catastrophic, with corresponding consequences for communities, infrastructure and natural resources.

Concerns about increased wildfire ignitions on or near roads should be distinguished between public-access roads and temporary administrative use roads, which do not carry the same potential for human ignitions. Properly maintained roads can assist in reduced catastrophic wildfire occurrence and impacts by facilitating access for fuel reduction treatments and wildfire suppression response. Road designation and management practices can further mitigate potential for increased ignition risk where new roads are constructed.

Wildlife Habitat and Connectivity

It is recognized that road development and associated motorized use can affect wildlife habitat and movement. Additional roads may increase disturbance and reduce habitat security for species such as mule deer, elk, and bighorn sheep. Roads can also contribute to habitat fragmentation and affect important migration corridors, crucial winter ranges, and other areas important to wildlife.

Changes in access can also influence wildlife behavior, habitat security, crowding, and the quality of hunting and fishing opportunities. The Forest Service should engage with State agencies to evaluate these tradeoffs early in any project process to help identify how proposed changes may affect public access, recreation use patterns, wildlife response, and the continued availability of diverse hunting, fishing, and wildlife-associated recreation opportunities.

These considerations do not necessarily preclude road construction or reconstruction where access is necessary for management, emergency response, or risk reduction. Rather, they reinforce the importance of site-specific analysis and early coordination with State agencies and administrative access management options.

NDF and NDOW will continue to work together with the USFS to identify wildlife and habitat considerations early in the planning process so that road location, design, timing, access restrictions, and other mitigation measures can be incorporated where appropriate.

Noxious Weed Spread

Since the 1980s, Nevada has lost nearly 71% of its core sagebrush habitats largely through a combination of and interaction between ecosystem disturbances, including catastrophic wildfires and invasive annual grasses or other noxious weeds. Roads are known vectors for these invasives, which provide fine fuels, amplifying wildfire risks while degrading critical habitat on localized scales. While roads may provide vectors for weeds, travel management should include treatment of those weeds so they do not contribute to increased risks. Limiting access for administrative management of ecosystems to mitigate and manage weed invasions and wildfire risks at the landscape scale will likely produce contribute to existing upward trends in loss of habitat quality and ecosystem health.

These potential impacts highlight the value of proactive coordination among State agencies, local governments, and federal agencies to identify and address resource concerns during project planning, while also supporting responsible and effective fire management.

High-Priority Watersheds Need to be Considered

Nevada's municipal water supplies face multiple threats, and roadless-area restrictions can directly affect the ability to protect key watersheds. WUI proximity alone is not an adequate measure of management need as many watershed areas lie far beyond the WUI boundaries yet remain highly vulnerable to wildfire and other threats to these water sources. Final analysis should consider high-priority watersheds identified through Nevada's Shared Stewardship, state planning, drinking-water assessments, and local collaborative processes. Watershed protection

should be an explicit criterion for modifying Alternative 3 boundaries or allowing necessary access and treatment. The municipal-watershed datasets should not be presented as identical to Nevada's Shared Stewardship priority-watershed designations. Instead, these areas provide additive evidence of the significant watershed overlap that warrants a more detailed state-informed analysis.

Road Maintenance and Travel Management Challenges Should be Addressed

Road maintenance backlogs are an ongoing challenge for the USFS, but they should not be used to limit construction of roads that are necessary for management, emergency response, or risk reduction. Road maintenance issues in one area should not preclude necessary actions elsewhere. Supporting management access does not imply permanent road retention for all roads. Roads should be evaluated throughout their entire life cycle, including closure and decommissioning when no longer needed. Nevada supports a range of options, including:

- Temporary roads
- Reconstruction and upgrades of existing roads, road prisms and stream crossings
- Strategic permanent access where recurring management is necessary
- Seasonal or administrative closures
- Best management practices and monitoring
- Maintenance and decommissioning funding

USFS should also incorporate wildlife habitat and migratory path considerations, weed management, erosion control, and sedimentation prevention into road design as well as maintenance standards to protect water quality.

Meaningful Roles and Integration of State and Local Partners

States and local governments have detailed information about communities, infrastructure, watershed vulnerabilities, forest conditions, wildfire risk, wildlife considerations, industry capacity, and implementation feasibility. Their early and substantive involvement allows the USFS to make more informed and locally relevant decisions.

To ensure robust participation in a post-recission environment, the State of Nevada recommends:

- Early involvement in the development of alternatives
- A formal timeline and process for coordination with State agencies
- Cooperating-agency participation where appropriate
- A formal role in reviewing WUI and road datasets
- A clear process for proposing boundary modifications
- Adequate time to review proposed boundaries
- Written explanations when recommendations are not adopted
- Integration of Shared Stewardship and Community Wildfire Protection Plan priorities

Conclusion

The State of Nevada supports a durable management framework that reduces policy instability, litigation, and uncertainty. Returning roadless-area decisions to forest plan and project-level process will allow for more accurate, locally informed, and timely management. The current national rule does not sufficiently consider Nevada's ecological and wildlife diversity, existing road network, land-management-plan direction, WUI conditions, Shared Stewardship landscapes, or high-priority watersheds.

Rescission would increase the need for collaboration among managers, states, local governments, and the public to determine where access facilitating management is necessary and where roadless characteristics should remain the primary management emphasis.

NDF and NDOW value partnerships with the USFS and look forward to continued collaboration to implement our Nevada Shared Stewardship goals. Please contact NDF and NDOW if additional information is needed.

Sincerely,

Ryan Shane
State Forester Firewarden

A handwritten signature in blue ink, appearing to read "Alan Jenne", is written over a light gray rectangular background.

Alan Jenne
Director
Director Nevada Department of Wildlife