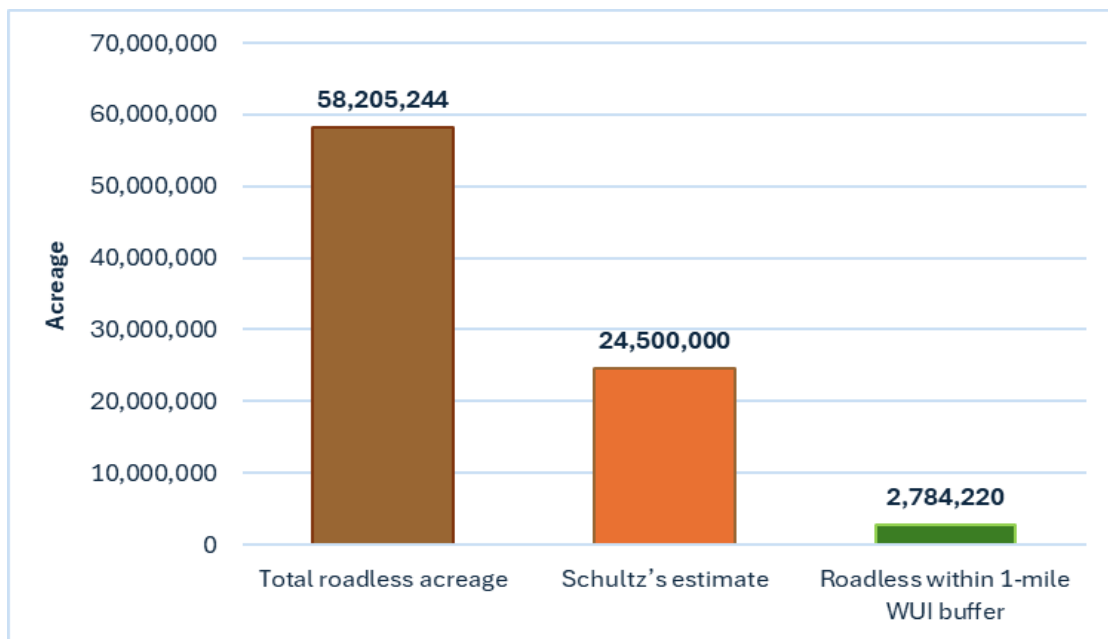




## Forest Service Chief Grossly Exaggerates Roadless Rule Concern

While testifying at the Senate Energy and Natural Resources Committee’s July 10 hearing on the U.S. Forest Service’s budget proposal, Forest Service Chief Tom Schultz claimed that 24.5 million acres of inventoried roadless areas (IRAs) are located within or within one mile of the wildland-urban interface (WUI). Chief Schultz made this exaggerated statement twice, in response to questions from Senator Lee and Senator Cantwell (see transcript excerpts below). Senator Lee subsequently put out a [press release](#) quoting Chief Schultz’s misleading claim as justification for Lee’s support for rescinding the Roadless Area Conservation Rule.

However, Chief Schultz’s claim is grossly inaccurate. A straightforward GIS analysis conducted by The Wilderness Society, using the Forest Service’s own data,<sup>1</sup> shows that only 2.8 million acres of IRAs are located within or within one mile of the WUI, not 24.5 million. That is nearly a ninefold difference: less than 5 percent of IRA acreage is in close proximity to the WUI, not 42 percent as Schultz claimed.



How could this discrepancy have occurred? One possibility is the source of the WUI data. It is our understanding that the Forest Service analysis utilized a dataset that aggregated areas evaluated as part of

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<sup>1</sup> Inventoried Roadless Areas (IRAs) are delineated according to the national 2001 Roadless Area Conservation Rule and subsequent Idaho and Colorado state Roadless Rules, with areas calculated in ArcGIS. Roadless area data are available from the U.S. Forest Service’s [Geospatial Data Discovery](#) site.

The Wildland-Urban Interface (WUI) is [defined by the U.S. Forest Service](#) as “the area where houses meet or intermingle with undeveloped wildland vegetation.” The authoritative WUI map was developed by scientists at the University of Wisconsin, the Forest Service’s Northern Research Station, and elsewhere using the definition of the WUI published by the U.S. government in the [01/01/2001 Federal Register](#) and methods described in the 2018 peer-reviewed publication “[Rapid growth of the US wildland-urban interface raises wildfire risk.](#)” The WUI data are available from the [US Forest Service](#) or the [SILVIS Lab](#).

the Community Wildfire Protection Plan (CWPP)-development process authorized by the 2003 Healthy Forests Restoration Act. Under that process, communities, counties, and sometimes even whole states conducted analyses to identify priority areas for fuel treatment and in some cases declared the entire analysis area to be WUI, leading to dramatic overestimates of WUI area. For example, the template language used by the state of Nebraska in its 14 CWPP planning regions led to [the entire state](#) being declared WUI, despite the fact that less than one-tenth of one percent of the state is WUI, according to the authoritative [Forest Service analysis](#).

The magnitude of the Chief's misleading claim casts serious doubt on the Trump Administration's justification for rescinding the Roadless Rule. Chief Schultz told the Senate Committee that having 24.5 million acres of roadless areas within one mile of the WUI was "our primary concern" with the Roadless Rule. Since that concern was based on an extremely faulty perception of IRAs' proximity to the WUI, The Wilderness Society urges the Trump Administration to re-evaluate and reverse its decision to rescind the Roadless Rule as announced by USDA Secretary Rollins on June 23.

#### A Better Way:

The Wilderness Society's GIS analysis reveals that there is over eight times as much land (23,286,062 acres) within one mile of the WUI on national forests outside of wilderness and roadless areas as there is inside IRAs where the Forest Service could be working now to reduce the wildfire threat to communities. For the 2.8 million acres of IRAs that are within one mile of the WUI, the national Roadless Rule provides adequate regulatory exceptions and safeguards. Specifically, the Rule allows road building if a road is needed to protect communities from the threat of fire or other catastrophe, and it allows timber cutting to reduce the risk of wildfire. A 2020 Forest Service [research study](#) of Roadless Rule implementation found that the agency has been able to accomplish fuel reduction projects as often in roadless areas as in roaded areas of the national forests. There is no need to rescind the Roadless Rule to protect communities or reduce fuels and wildfire risk.

Furthermore, as Senator Cantwell pointed out at the Senate hearing, building roads into roadless areas could significantly increase the risk of wildfire ignitions. A recent Wilderness Society [study](#) found that wildfires are four times more likely to start within 50 meters of a road than in roadless areas. Thus, building roads into roadless areas is likely to increase the probability of fire, not decrease it.

Chief Schultz's Testimony: Following is an unofficial transcript of Shultz's [testimony](#) in which he makes the false claim discussed above.

0:30:20 -- Senator Lee: "Would you say that the Roadless Rule has helped or hindered wildfire mitigation efforts over the last two decades?"

Chief Schultz: "Senator Lee, I would say the Roadless Rule and what we see in terms of the data sets, there's about 24.5 million acres of roadless areas that are within the wildland urban interface [or] within one mile of the wildland urban interface. So, by not being able to have areas that we can go into and manage or be able to put the fires out, that is a problem. So, it doesn't help for sure, and it definitely hinders."

1:03:45 -- Senator Cantwell: "Do you have an assessment of the cost of rescinding the Roadless Rule when you might be building roads into pristine areas and causing more challenges?"

Chief Schultz: "Senator, I think our bigger concern ... is that we've got 24.5 million acres of the roughly 60 million acres of roadless that is ... either within the WUI or within a mile of the WUI. So, that is our primary concern."