



United States Department of Agriculture/US Forest Service
Attn: Director, Ecosystem Management Coordination,
201 14th Street SW, Mailstop 1108,
Washington, DC 20250-1124
Submitted via regulations.gov

August 25, 2026

Re: Proposed Modifications to the Roadless Area Conservation Rule, Docket ID: FS-2025-0001

To whom it may concern:

The following comments are submitted on behalf of Santa Barbara Botanic Garden, a nonprofit 501c3 conservation science organization working to protect native plants and habitats for the health and wellbeing of people and the planet.

With our 100-year history of restoring, monitoring, and advocating for natural areas and native plants throughout California, **we strongly oppose the proposal to rescind the 2001 Roadless Area Conservation Rule** (i.e. Roadless Rule) and urge you to move forward with the 'No Action Alternative 1.' The proposal directly threatens some of the Garden's current and past project sites on California's Central Coast, could result in increased – not decreased – fire risk, and may lead to the loss of countless plant communities and greatly increased timber/resource extraction, all of which pose a threat to ecosystem health and the communities that rely on it.

Roadless areas are home to over 600 rare plant species and 26 sensitive habitats tracked by the California Natural Diversity Database (CNDDB), from ancient bristlecone pines to *Darlingtonia* fens. In our region, Santa Barbara Botanic Garden has worked, and is actively working, on a number of rare and native plant projects throughout and/or near various roadless areas within the Los Padres National Forest (LPNF), including:

- **Biodiversity Black Holes Project** - The Garden, with funding from the National Fish and Wildlife Foundation and in partnership with the U.S. Forest Service, conducted extensive botanical surveys across the Zaca and Jesusita fire scars in the LPNF. Focusing on both rare and invasive plant species, the project covered a total of 735 miles and mapped 324 unique miles at least once, identifying 237 rare plant populations and 604 invasive weed populations. The Garden exceeded its goals by collecting 3,628 herbarium specimens and making 31 conservation seed collections to support rare plant conservation and future habitat restoration. This work helps guide ecological recovery and restoration efforts in an under-surveyed area of high conservation value.



As is typical in other areas, our work demonstrated that habitat farther from roads and fuel breaks are less invaded than areas in close proximity to anthropogenic disturbances. The Garden is now poised to conduct similar botanical surveys in the Madre and Gifford fire scars within the Los Padres.

- **Milkweed Monitoring Project** - The Garden has worked to locate, map, collect seed from, and assess the health of early-season milkweed across the LPNF because those milkweeds provide the critical early breeding habitat for western monarch butterflies. The work is part of a multi-partner project that ran from May 2023–May 2026 and is explicitly intended to inform restoration and US Forest Service management. Interestingly, this project is showing a strong positive correlation between proximity to roads and trace pesticide prevalence on milkweed. The closer milkweed is to roads, the more pesticides residue is found on the plant, directly threatening monarchs and other fauna.
- **Rare Plant Seed Collection** – The Garden’s Rare Plant Team has conducted extensive rare plant surveys and frequently makes conservation seed collections within LPNF. Many of these collections represent the first and only conservation seed collection for these rare plants, as was the case with two recent collections in the LPNF: *Galium clementis* near Cone Peak in the Big Sur area and *Navarretia ojaiensis* off the Foothills Trail just north of Ojai in Ventura County. This conservation work acts as a safeguard against extinction events in the wild. Without this work, rare plant populations like these are in danger of extinction from habitat loss and invasive species.

With more than 600,000 acres at risk via this new proposal in our region, rescinding the Roadless Rule will directly impact the Garden’s ongoing scientific research aimed at protecting and enhancing biodiversity in the LPNF and surrounding areas. The Garden is invested in the health of the forest for biological and ecosystem health reasons but also due to the critical scientific data that our forests provide.

Regarding fire resilience, roadless areas including those on the south Central Coast of California are made up in large part by chaparral, oak woodlands, and coastal sage scrub ecosystems – landscapes which require ecologically informed fire management, not logging and thinning.

We are concerned that the addition of roads in existing roadless areas would do the opposite of what your agency is suggesting, and instead of reducing wildfire risk would likely increase fire risk since studies have found that the highest ignition rates for manmade wildfires occur near roads – generally within ½ mile. Road construction involves removal of native vegetation, opening the door for fast-growing invasive weeds, particularly dense grasses and herbs that spread along disturbed roadsides. Once dry, these fine, continuous fuels create tinderbox conditions, igniting easily from hot road debris, increasing fire hazard and thus increasing fire frequency beyond natural fire regimes, reshaping entire landscapes. The grass-fire cycle is well documented and can lead to widespread type conversion, whereby our diverse and resilient shrublands are converted to highly flammable nonnative annual grass monocultures with high frequency fire regimes.



In 2001, the adoption of the Roadless Rule was supported by an astounding number of Americans. A record number of public comments (1.6 million) were submitted in the lead up to the Rule's adoption, and of those comments, 95% spoke in favor of new restrictions on roads. 600 public hearings were held on the matter across the country. And across party lines, there was strong support for roadless rule protections, with 87% of Democrats, 77% of Independents, and 65% of Republicans all in favor.

It is important to note that back then – and still today – the Roadless Rule did not target existing roads on our Forest Service lands. It focused specifically on halting *new* road construction and large-scale industrial activities. And contrary to current talking points citing restrictions on firefighting activities as a result of the Roadless Rule, the existing rule does not prohibit the entry or use of firefighting equipment to battle wildfires as they arise.

The proposal to rescind the Roadless Rule is an ill-timed and unnecessary rule change that flies in the face of conservation science, fire science, and goes against the will of millions of Americans who just 25 years ago made it clear that they valued increased protection of natural resources on federally managed lands. For these reasons and more, **Santa Barbara Botanic Garden is adamantly opposed to the rescission of the roadless rule** and joins a multitude of regional, state, and federal officials and organizations in expressing our strong opposition to the reversal of this wildly popular conservation program.

Eric Cárdenas, Director
Impact and Advocacy

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