

September 16, 2026

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

Re: Special Areas; Roadless Area Conservation – Proposed Rescission of the 2001 Roadless Area Conservation Rule; RIN 0596-AD66; Docket No. FS-2025-0001

Dear Acting Director White:

Protect Our Water Jackson Hole (POWJH) is a nonprofit organization dedicated to protecting and restoring Teton County's water resources. We write to express our strong opposition to the proposed rescission of the 2001 Roadless Area Conservation Rule and to urge the U.S. Forest Service to select the No Action Alternative and retain the existing Rule.

Teton County's roadless lands are an essential part of the region's watershed and are particularly important given that Teton County comprises the majority of the source area for the Eastern Snake Plain Aquifer, a sole-source aquifer. These lands protect headwaters, support cold-water fisheries, sustain wetlands and riparian systems, and help preserve the quality of the surface water and groundwater upon which our community and ecosystem depend. Once these systems are disturbed, the resulting impacts to water quality and watershed function can be difficult, costly, and in some cases impossible to fully reverse.

Roadless areas in and around Teton County protect the headwaters of the Snake, Gros Ventre, Hoback, Buffalo Fork, Pacific Creek, Shoal Creek, Willow Creek, and numerous other rivers and streams. These waters support drinking water, fisheries, wetlands, Wild and Scenic River values, and the broader ecological function of the Greater Yellowstone Ecosystem. Teton County similarly recognizes that these roadless landscapes play an important role in maintaining watershed function. Healthy watersheds provide natural processes that regulate runoff, retain sediment, moderate stream temperatures, recharge groundwater, and maintain habitat for native aquatic species.

The Forest Service's own Draft Environmental Impact Statement (DEIS) recognizes that road construction and timber harvest can result in vegetation loss, soil erosion and compaction, increased runoff, landslides, and reduced water quality. It further recognizes that roadless areas generally have good water quality because they have experienced limited disturbance, and that the No Action Alternative provides the greatest protection for water quality.

POWJH also shares the County's concern that expanding the road network without adequate resources to maintain it could create additional water-quality problems. The DEIS recognizes that inadequate road maintenance can itself have detrimental effects on water quality and that insufficient maintenance funding is a significant reason for inadequate road maintenance.

Teton County's roadless landscapes contain some of the region's most important cold-water streams and fisheries. The County's Outstanding Areas report documents clear and cold water maintained by wetlands and willow communities in Shoal Creek, cold-water fisheries in Willow Creek, and healthy watershed conditions throughout areas including Spread Creek and Mount Leidy.

These systems are particularly sensitive to changes in watershed function. Increased sediment delivery, altered runoff patterns, vegetation loss, and disturbance of riparian areas can affect both water quality and aquatic habitat.

The County's comments appropriately recognize that maintaining intact headwaters is more responsible than creating new infrastructure and attempting to mitigate its consequences later.

This principle is particularly important in Teton County, where our rivers and streams are not only ecological resources but also foundational to our community's identity, economy, recreation, agriculture, and quality of life. For a community whose identity and economy are so closely tied to clean, cold water, we should be taking every reasonable opportunity to prevent potential impacts from roads, not creating additional pathways for them.

For these reasons, Protect Our Water Jackson Hole respectfully requests that the Forest Service select the No Action Alternative and retain the 2001 Roadless Area Conservation Rule.

Thank you for considering POWJH's comments and for your continued stewardship of the lands and waters of the Greater Yellowstone Ecosystem.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Evans". The signature is written in a cursive, flowing style.

Jennifer Evans

Advocacy Director