



FLORIDA NATIVE PLANT SOCIETY

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September 19, 2025

Brad Kinder, Acting Director
Ecosystem Management Coordination
United States Forest Service
201 Fourteenth Street SW, Mailstop 1108
Washington, D.C. 20250-1124

SUBJECT: Florida Native Plant Society Opposition to Rescinding the Roadless Rule

Dear Director Kinder:

The Florida Native Plant Society (FNPS) opposes the United States Department of Agriculture's proposal to rescind the Roadless Rule (Rule). The purported rationale for rescinding the Rule includes making it easier to restore the health of our national forest system. FNPS would be fully supportive of the proposal if we believed the Rule was an impediment to restoring forest health. In fact, the Rule serves as an important safeguard to our national forests and we believe the true intent of the proposal was revealed by comments from Secretary Rollins, who stated that rescinding the Rule aligns with Executive Order 1419 – *Unleashing Prosperity Through Deregulation*. The beneficiaries of this proposal will not be our national forests, nor the American people, but rather the commercial interests seeking to exploit our natural heritage.

Florida has three national forests: the Apalachicola, Osceola and Ocala. Combined, these national forests span 1.1 million acres. Florida's national forests are home to 136 plant species and 36 animal species designated as either threatened or endangered. Many of these species would be put at even greater risk by the expanded logging, mining, and other resource extraction that would be allowed if the USDA follows through on its proposal to rescind the Rule. Unfortunately, only 50,000 acres, or less than 5 percent of our entire national forest land area, is protected under the Roadless designation. We wish it was more and want to retain the extra level of protection the designation provides to those parts of our national forests.

Roadless areas in the Apalachicola National Forest are especially diverse and support some of Florida's finest stands of old growth longleaf pine, which tower over botanically rich and unique pitcher plant savannas that are extraordinarily sensitive to even slight changes in hydrology. These pinelands also provide critically important habitat for the federally endangered red-cockaded woodpecker and federally threatened frosted flatwoods salamander. Roadbuilding and logging are often the source of damaging disruptions to hydrology, and protection of old growth longleaf pine from logging is essential to maintaining suitable habitat for the red-

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cockaded woodpecker. Ocala National Forest's Roadless areas help protect the most extensive sand pine scrub ecosystem in the world, support the federally threatened Florida bonamia and Florida scrub jay, and encompass much of the springshed of the Juniper Spring system – one of the only pristine springs remaining in Florida. The Rule provides exactly the kind of protection these sensitive species and habitats require.

Threatened and Endangered Plant Species in Florida's Roadless Areas

Species	Common Name	Listing Status
<i>Asclepias viridula</i>	Southern Milkweed	State Threatened
<i>Bonamia grandiflora</i>	Florida Bonamia	Federally Threatened
<i>Calopogon multiflorus</i>	Many-Flowered Grasspink	State Threatened
<i>Gentiana pennelliana</i>	Wiregrass Gentian	Federally Endangered
<i>Harperocallis flava</i>	Harper's Beauty	Federally Endangered
<i>Justicia crassifolia</i>	Thickleaf Waterwillow	State Endangered
<i>Macbridea alba</i>	White Birds-in-Nest	Federally Threatened
<i>Macranthera flammea</i>	Flameflower	State Endangered
<i>Phoebanthus tenuifolius</i>	Pineland False Sunflower	State Threatened
<i>Pinckneya bracteata</i>	Fevertree	State Threatened
<i>Pinguicula ionantha</i>	Panhandle Butterwort	State Endangered
<i>Platanthera chapmanii</i>	Chapman's Fringed Orchid	State Endangered
<i>Platanthera integra</i>	Yellow Fringeless Orchid	State Endangered
<i>Rhexia parviflora</i>	Apalachicola Meadowbeauty	State Endangered
<i>Rhynchospora crinipes</i>	Hairy Pedunkled Beaksedge	State Endangered
<i>Sarracenia psittacina</i>	Parrot Pitcherplant	State Threatened
<i>Sarracenia rosea</i>	Gulf Pitcherplant	State Threatened
<i>Stachydeoma gravelons</i>	Mock Pennyroyal	State Endangered

It is important to note that the Rule does not prevent all logging or new road development in designated Roadless areas. It simply requires some additional assessment and process to ensure the sensitive natural resources protected within them receive the extra consideration they deserve to avoid reckless and short-sighted decisions made on behalf of commercial interests. In fact, 25,000 acres (50 percent) of Florida's Roadless areas include a special prescription that expressly allows road construction and logging. The Rule is incredibly popular with the American public, and with the 6,800 members of FNPS, because they support the additional protection it provides.

While the areas covered by the Rule in Florida are not nearly as vast as the protected areas in the Western US, they represent some of the most pristine and biodiverse habitats remaining in our state. They are irreplaceable. It is entirely appropriate they be set aside for special protection from commercial exploitation. Florida's national forests feature more than 1,400 miles of trails and 118 developed recreational sites, and host more than 1.1 million visitors a year who hunt, camp, fish, hike, and off-road there. The vast majority is already available for logging. Given this level of use, we submit the Forest Service risks deviating from its long-vaunted commitment to multiple use management if the Rule is rescinded. It could be argued that the

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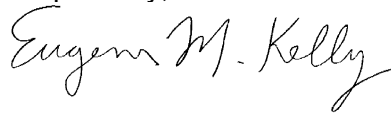
balance between human use, resource extraction and resource conservation already skews towards the consumptive end of the spectrum. The Rule helps ensure that true conservation remains at least part of the multiple use equation.

We know road development in natural areas is a significant vector for the introduction of invasive species and that wildfire frequency increases with road density. As noted previously, road construction and logging activity often alters natural hydrology and can lead to wholesale degradation of entire watersheds. Clearcutting often fragments degrades habitat and leads to loss of biodiversity. Some of the references provided below underscore the reality of our concerns.

1. [Habitat fragmentation: disrupts wildlife movement and gene flow.](#)
2. [Loss of biodiversity: reduces species diversity and ecosystem stability.](#)
3. [Altered microclimates: changes temperature, humidity, and light intensity.](#)
4. [Soil erosion and nutrient loss: leads to soil degradation and water pollution.](#)
5. [Water quality impacts: harms aquatic ecosystems and water-dependent wildlife.](#)
6. [Secondary succession effects: alters ecosystem structure and species composition.](#)
7. [Negatively effects human well-being.](#)

The Forest Service's legacy of effective resource management now hangs in the balance as you consider rescinding one of your most effective tools for advancing conservation. Please consider our concerns carefully as you assess the proposal to rescind the Roadless Rule and then leave the Rule intact.

Respectfully,



Eugene M. Kelly, President
Florida Native Plant Society