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Re: Comments on Notice of Intent to Prepare an Environmental Impact Statement and Initiate a Rulemaking on the Roadless Area Conservation Rule, Docket No. FS-2025-0001

Thank you for providing this opportunity to comment on the scoping for "Special Areas; Roadless Area Conservation; National Forest System Lands," docket number FS-2025-0001.

These comments are signed and endorsed by the following organizations: 350 Central Mass, 350 Mass, Adirondack Council, Biofuelwatch, Boston Catholic Climate Movement, Canton Residents for a Sustainable Equitable Future, Climate and Democracy Project, Climate Communications Coalition, Climate Writers, Elders Climate Action - Massachusetts Chapter, Friends of Bell Smith Springs, Friends of Blackwater Inc, Greenfield Solar, Hilltown Vision, Keep the Woods, Kucinich Institute for Human and Ecological Security, MASS PLAN, North American Climate, Conservation and Environment (NACCE), Partnership for Policy Integrity, Pipe Line Awareness Network for the Northeast, Ridgeview Conservancy, Slingshot, Soda Mountain Wilderness Council, Speak For The Trees Too WV, Standing Trees, Tennessee Heartwood, Third Act Massachusetts, Trees as a Public Good Network, Wendell State Forest Alliance, Wild Hope, Worcester Congregations for Climate and Environmental Justice, Peace of Mind Reiki, Mountain Sense LLC., Massachusetts Forest Watch, North Country Alliance for Balanced Change, Standing Trees, Third Act Vermont, Stop Vermont Biomass, Wonalancet Out Door Club.

On behalf of our thousands of supporters and members, we strongly oppose rescinding the 2001 Roadless Area Conservation Rule (Roadless Rule, Rule, or RACR). Instead, we urge you to 1) keep the Rule intact to protect the wildest and healthiest parts of our National Forests, and 2) update the Roadless Rule maps to include additional areas that have been mapped as IRAs during Forest Plan revisions since 2001. Finally, we request an extension of the current comment period and assurances that any future comment periods will extend longer than just three weeks, which is an insufficient amount of time to facilitate robust public participation.

The Roadless Rule is an acknowledgement by the USDA Forest Service (Forest Service or Service) that roadless landscapes in National Forests have uniquely important qualities and perform unique services that distinguish such areas from other National Forest System lands (and other public and private lands). As noted in the NOI, the vast majority of RACR IRAs (93%) are not recommended for wilderness designation in a current Forest Plan. But this does not mean that 93% of IRAs aren't important for their myriad ecosystem service values, recreational opportunities, and other attributes explored at length below. The

Roadless Rule ensures that the unique qualities and benefits of these IRAs are maintained or enhanced for the greatest public good in the long run, regardless of future Wilderness designation by Congress. In short, the Roadless Rule may be an outgrowth of the 1964 Wilderness Act, but the Rule's promulgation was a loud and clear statement by the Forest Service that IRAs have essential, irreplaceable value for the American public irrespective of their potential for Wilderness designation.

The Forest Service promulgated the 2001 Roadless Area Conservation Rule as "a down payment on the well-being of future generations," in the words of former Forest Service Chief Mike Dombeck, who oversaw the Rule's development.[1] Over 1.5 million Americans submitted comments in support of the Rule, a record for public participation in federal rulemaking.

The irreplaceable landscapes protected by the Roadless Rule were central to the cultures and wellbeing of indigenous people across North America prior to European colonization, and they remain important today. Randy Kritkausky of Vermont, a Federally Enrolled Member of the Citizen Potawatomi Nation, wrote that "Repeal of the Roadless Area Conservation Rule would literally make permanent and devastating inroads into protected National Forests which are, for many Indigenous Peoples, our primary connection with unspoiled ancestral lands. This threat is not only ecological, it is profoundly spiritual."[2]

The plan to rescind the Roadless Rule directly jeopardizes approximately 22% of New England's National Forest lands and the fish and wildlife who call these places home. The indirect impacts would be substantial, as well, including to surrounding economies rooted in recreation and tourism, to drinking water supplies, and to communities downstream threatened by more frequent floods and droughts. IRAs in the WMNF and GMNF are vital to our waters, wildlife, and way of life. They must remain intact.

For a visual tour of the importance of the Roadless Rule to New England's two National Forests, the GMNF and WMNF, we would like to direct you to our ArcGIS Story Map, located here: https://storymaps.arcgis.com/stories/2f9e9b3fec654af890d4b8c680167f8e.

Overview of Roadless Rule and Inventoried Roadless Areas in the GMNF and WMNF

The WMNF is an approximately 800,000-acre National Forest containing 235,000-acres of IRAs protected by the Roadless Rule. WMNF IRAs include such iconic and irreplaceable landscapes as: Mt Chocorua, Franconia Notch, Mt Moosilauke, Evans Notch, the Carter Range, Presidential Range, Pilot Range (also known as the Kilkenny), and others. The GMNF is an approximately 400,000-acre National Forest containing approximately 25,000-acres of IRAs protected by the Roadless Rule. These acres are primarily concentrated in the vicinity of the White Rocks National Recreation Area, but also include other portions of the National

[1] "What They Are Actually Saying – and What The Trump Administration is Ignoring: Roadless Rule Rescission." https://democrats-naturalresources.house.gov/media/press-releases/what-they-are-actually-saying_and-what-the-trump-administration-is-ignoring-roadless-rule-rescission

[2] Ibid.

Forest. In total, approximately 22% of the total National Forest System (NFS) acreage in New England is protected by the 2001 Roadless Rule.

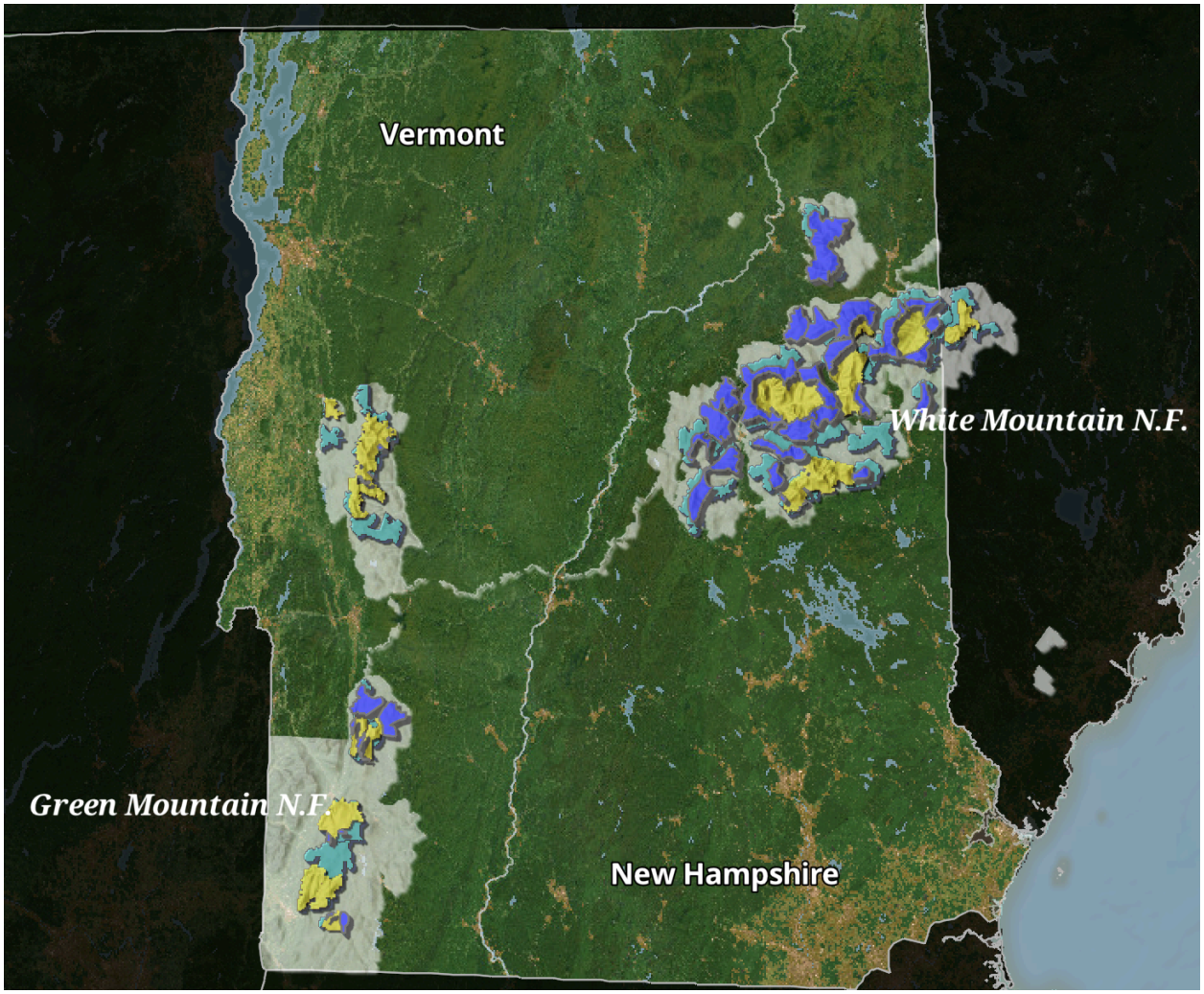

Figure 1 - A map of Wilderness areas (yellow), RACR IRAs (purple), and Forest Plan IRAs unprotected by the RACR (teal) across the WMNF and GMNF.

In a region of the country with fewer acres of old-growth forest and fewer acres of legally-protected wild forest lands than nearly any other region of the United States, Roadless Rule IRAs provide extraordinarily rare and important protection to forest landscapes. Only 3.3% of New England's land area is protected from logging and road construction.[3] The US Forest Service estimates that there are approximately 2,000 acres of old-growth forest in the GMNF and the WMNF, respectively, or well under 1% of each forest.[4] Similarly, it's estimated that just .03% of forests across the Northeast US are over the age of 150.[5]

[3] Foster et al 2023, "Wildlands in New England: Past, Present, and Future"
[4] USDA Forest Service DRAFT Ecological Impacts Analysis Report, 2024
[5] Kellett et al., *Forest-clearing to Create Early-successional Habitats: Questionable Benefits, Significant Costs*, 5 FRONTIERS FOR GLOB. CHANGE 1 (Jan. 9, 2023)

A significant amount of acreage in the GMNF and WMNF, beyond the acres protected by the Roadless Rule, meet the threshold requirement for Inventoried Roadless Areas and have been mapped as a part of Forest Plan revision Wilderness Inventories and Evaluations. Although these IRAs meet the same criteria as IRAs that are protected by the Roadless Rule, they lack the protections afforded by the Rule and are vulnerable to logging and road construction simply because the Forest Service has chosen not to update the Roadless Rule maps. In the GMNF, there are approximately 56,000-acres of Inventoried Roadless Areas unprotected by the Roadless Rule, and in the WMNF, there are approximately 132,480 acres of Inventoried Roadless Areas unprotected by the 2001 Roadless Rule.

The NOI Purpose and Need is Unsupported and Unjustified by Facts or Science

The Purpose and Need states that the "'one-size-fits-all' approach to roadless area management under the 2001 Roadless Rule is no longer appropriate…" This statement is either deliberately designed to confuse the public, or it belies a fundamental misunderstanding of the Rule. The Roadless Rule presently protects a vast range of high-quality wildlife habitat, allows for management discretion for wildfire mitigation, and supports a wide variety of motorized and non-motorized recreational uses. Today, the Roadless Rule provides unique benefits that aren't present across other areas of the National Forest System or on private lands. These benefits are explored in greater depth elsewhere in this comment.

The Purpose and Need also states that "Management flexibility is needed for the Agency to achieve its multiple use conservation mission, including timber production, recreation, wildfire suppression, and fuel reduction treatments." These claims are unsupported by science and debunked below:

- ***Timber Production***
  Nationwide, federal lands provide just 4% of the overall timber supply.[6] In the six New England states, federal lands provide, on average, well under 1% of the annual timber harvest volume (in Vermont, home of the GMNF, federal lands provide 2.3% of the total annual timber harvest volume, and in New Hampshire, home of the WMNF, federal lands provide less than one percent).[7] Roadless Rule IRAs encompass just 2% of the contiguous-48 states, and well under 1% of the land area of New England. Moreover, these lands are often skewed to steep slopes and high-elevation landscapes where logging is uneconomical and especially risky to soil health and water quality. Logging in federal lands is often conducted at a loss to taxpayers.[8] A major portion of that cost is road construction and maintenance, which would be necessary for any logging in areas presently protected by the Roadless Rule. Today,

[6] Kerr 2023, "Contribution of Federal Logs to the Nation's Wood Consumption"
[7] Average annual harvest removals of sound bole wood volume of trees (timber species at least 5 inches d.b.h.), in cubic feet, on private, state, and federal forest land in New England, 2018-2024. Source: https://apps.fs.usda.gov/fiadb-api/evalidator.
[8] Talberth and Niemi 2019, "Environmentally harmful subsidies in the US, Issue #1: The federal logging program."

the road maintenance backlog on the 370,000-miles of roads managed by the US Forest Service is $10.8 billion.[9] Such "below cost" logging would be exacerbated by the difficulties inherent in accessing timber in IRAs. In sum, Roadless Rule IRAs are not a significant or viable source of timber under any present or future scenario.

- ***Recreation***
  The Roadless Rule does not restrict recreational uses. Recreation decisions are made on a case-by-case basis at the National Forest Supervisor's Office or Ranger District levels. It is misleading at best to suggest that eliminating the Roadless Rule would have any impact on present or future recreational uses.

- ***Wildfire suppression and fuel reduction***
  Again, it is misleading at best to suggest that the Roadless Rule prevents wildfire suppression and fuel reduction. The Roadless Rule explicitly allows for management discretion for the purposes of wildfire mitigation and pre-emptive risk reduction. Furthermore, IRAs actually reduce the chance of wildfire ignitions,[10,11,12] and many also contain characteristics that make them more resilient to fire, since older and less fragmented forests are naturally more fire resistant (this and other characteristics of older forests are explored elsewhere in this document). Critically for our region of the US, the Forest Service recently recognized that "forests in the New England States were persistently low in exposure to wildfire mortality."[13] Such conclusions are reflected at the project level, as well, including in landscapes with large amounts of IRAs. For example, the WMNF Lost River Integrated Resource Project fuels report[14] and Final EA[15] note that there is no serious risk of wildfire in the Lost River Project area, a landscape dominated by both RACR and Forest Plan IRAs. A 2023 paper in Conservation Science and Practice notes that expensive management interventions are often unnecessary for addressing wildfire, and that "natural forests...tend to develop greater complexity, carbon storage, and tree diversity over time than forests that are actively managed."[16] This aligns with the findings of Lorimer and White (2003), which linked intense fires in the region to recently logged areas.[17] In conclusion, the Roadless Rule provides sufficient management flexibility for wildfire suppression and fuel reduction. Logging and road construction in IRAs is not a solution for reducing wildfire danger; in fact, such

[9] Sedlar 2025, "Public Lands for Private Profit: USDA to Revoke Roadless Rule." Center for Economic and Policy Research.
[10] Aplet et al, 2025 (in review), "Three-decade record of contiguous-U.S. national forest wildfires indicates increased density of ignitions near roads"
[11] Calkin et al 2023, "Wildland-urban fire disasters aren't actually a wildfire problem"
[12] Syphard et al 2025, "Regional patterns in U.S. wildfire activity: the critical role of ignition sources"
[13] "Mature and Old-Growth Forests: Analysis of Threats on Lands Managed by the Forest Service and Bureau of Land Management in Fulfillment of Section 2(c) of Executive Order No. 14072"
[14] Jeros 2024, "Lost River IRP Fuels Report"
[15] "Lost River IRP Environmental Assessment and Finding of No Significant Impact" at 33
[16] Faison et al. 2023, "The importance of natural forest stewardship in adaptation planning in the United States"
[17] Lorimer and White 2003, "Scale and frequency of natural disturbances in Northeastern US"

activities will likely exacerbate the risk of fire. Finally, the threat of wildfire is not uniform across the nation.

Based on a wealth of evidence, the Forest Service should scrap its plans to rescind the Roadless Rule because the Purpose and Need of this NOI is unsupported and unjustified.

The EIS must assess the unique impacts that the Rule's rescission would have at the site-specific level

IRAs cannot merely be measured by statistics; they are real places, with unique attributes, and local and regional importance that must be investigated in detail to understand the impacts of rescission. The Forest Service must first establish a baseline against which to measure any impacts. To do this, one starting place (by no means the only) should be the Forest Service Planning Rule Chapter 70 Wilderness Inventories and Evaluations conducted nationwide during Forest Plan revisions.[18] In the GMNF and WMNF, these inventories and evaluations are memorialized in Appendix C of their respective Forest Plans. Each inventory and evaluation contains quantitative and qualitative descriptions of the unique characteristics of each IRA.[19] It's important to note that although these inventories and evaluations should be used to *inform* an EIS regarding Roadless Rule rescission, these inventories and evaluations were performed in the context of the Forest Service's Forest Planning wilderness recommendation process, and are not a substitute for an objective study of the unique characteristics of a given IRA.

Importance of the Roadless Rule for Wildlands and Old-Growth Management

The protection afforded to IRAs by the Roadless Rule are not equivalent to Congressionally-designated Wilderness areas, since the Rule allows for limited active interventions including for wildfire mitigation, and for motorized and mechanized recreational uses. However, to the best of our knowledge, no IRAs protected by the Rule have been logged in either the GMNF or WMNF since the Rule was promulgated in 2001. Today in the USFS Eastern Region (Region 9), approximately 22,000 acres, or 7% of all old-growth that is unprotected by legally "reserved lands," is protected by the Roadless Rule.[20] This means that, in addition to the 238,000-acres of Wilderness designated by Congress in the GMNF and WMNF, Roadless Rule IRAs (totaling 260,000-acres) contribute significantly to regional goals for wildlands[21] and for restoring old growth forests, and provide critically-important habitat, ecosystem, and recreational benefits offered by few other forests across New England.

Recent scientific advances conclusively demonstrate that the restoration and protection of large, intact, interconnected, structurally complex, old-forest ecosystems are essential

[18] Forest Service Handbook 1909.12 – Land Management Planning Handbook
Chapter 70 - Wilderness
[19] See: GMNF 2006 Forest Plan "Appendix C: Wilderness," and WMNF 2005 Forest Plan "Appendix C: Inventoried Roadless Area Evaluations"
[20] National Old Growth Amendment DEIS at 79, Table 7.
[21] Foster et al 2023, "Wildlands in New England: Past, Present, and Future"

strategies in the fights against climate change and extinction. The Roadless Rule represents one of the most important and effective strategies yet undertaken by the Forest Service to protect and restore mature and old forest ecosystems at scales large enough to provide essential habitat, support natural disturbance regimes, and produce high quantities of essential ecosystem services including carbon storage, flood and drought mitigation, and water quality enhancement.

On July 10th, 2023, residents across New England were hit with historic flooding. In Vermont, where upwards of six inches (two months' worth) of rain fell over 36 hours, entire business districts and countless homes were damaged or destroyed. The massive flood control dam upriver of Montpelier, Vermont, came within inches of releasing significant quantities of water downstream, wreaking additional havoc.

Just one month before the storm, researchers at Dartmouth and the University of Vermont published a paper predicting that extreme precipitation in the Northeast US will increase more than 50% by 2100 due to climate change.[22] This research is in keeping with the conclusions of many other scientists in New England: increasing precipitation and resultant flooding are likely to be the costliest impacts of climate change in the region. Periods of drought are also predicted to become more normal, as we are experiencing in 2025.[23] Both flooding and droughts are mitigated by intact forest landscapes protected by the Roadless Rule.

Given the direct connection between forest health, water absorption, and flood mitigation, the US Forest Service has the unique ability, opportunity, and obligation to be a leader in helping Eastern US states overcome the flooding that is expected to increase in likelihood with climate change. Even better, the same management practices that improve flood mitigation – namely, allowing forests to grow old and removing and recontouring roads – have enormous co-benefits for carbon sequestration and storage, biodiversity, water quality, recreation, and more. The protection and restoration of intact forests is a rapidly deployable, low-cost, and scientifically-proven strategy to simultaneously protect communities, boost our economy, and meet climate adaptation and resilience goals. The USDA USFS Climate Adaptation Plan defines "adaptation" as "[t]he adjustment in natural or human systems to a new or changing environment that exploits beneficial opportunities or moderates negative effects."[24] The plan encourages "[m]anaging for resilience, in ecosystems and well as in human communities, through adaptation, mitigation, and sustainable consumption strategies."

In the same document, the USDA recognizes that "[o]ld-growth and mature forests, and other forests with similar characteristics, are an ecologically and culturally important part of the National Forest System. They reside within a continuum of forest age classes and

[22] Picard, C.J., Winter, J.M., Cockburn, C. *et al.* Twenty-first century increases in total and extreme precipitation across the Northeastern USA. *Climatic Change* **176**, 72 (2023). https://doi.org/10.1007/s10584-023-03545-w

[23] "NDMC analysis finds changing snow, precipitation trends in the Northeast," October 17, 2023. National Drought Mitigation Center.

[24] USDA USFS Climate Adaptation Plan. July 2022. FS-1196.

vegetation types that provides for a wide diversity of ecosystem values**.** Many forests with old-growth characteristics have a combination of higher carbon density and biodiversity that contributes to both carbon storage and climate resilience. **They are often viewed as ideal candidates for increased conservation efforts, and are frequently found within areas designated as wilderness or roadless or other management areas where timber harvest is precluded**" [emphasis added].[25]

According to the USDA and USDOI report, "Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management," "[o]ld-growth forest represents 18 percent and mature forest another 45 percent of all forested land managed by the two agencies," for a total of 112,770,527 acres. Specific to National Forests, the same report inventoried 24,400,019-acres of old growth and 67,413,361-acres of mature forests across all USFS-managed lands. Combined, this total of 91,813,380 acres of mature and old-growth forests represents ~48% of the 193 million-acres managed by the US Forest Service.

Woodall et al 2023, "Classifying Mature Federal Forests in the United States: The Forest Inventory Growth Stage System," which was instrumental to informing the aforementioned report, analyzed several methodologies for defining and inventorying mature and old-growth forests across federal lands. Using a tree and stand-age threshold for maturity beginning at 80 years of age, and an old-growth threshold of 150-years, Woodall et al found 71,386,067-acres of mature forests and 41,295,950-acres of old-growth across both USFS and BLM-managed lands, for a total of 112,682,015-acres.

In contrast to the wealth of mature and old-growth forests managed by the USFS and BLM, US private forests tend to have lower average aboveground carbon,[26] and lower structural complexity.[27] Federal public lands contain the largest proportion of mature and old-growth forests across all land ownerships, with the vast majority found on lands managed by the USFS.[28] Mature and old-growth forests (MOG) in federal ownership amounts to more than double the amount in private corporate ownership, and at least four times the amount under state management.[29] One recent study "classified 6.3% of current forested lands in the United States as old growth and almost one-third as mature. Of the current old-growth forest estate, approximately 46% is found on federal public lands."[30]

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[25] Ibid

[26] Zheng, D. et al. "Relationships Between Major Ownerships, Forest Aboveground Biomass Distributions, and Landscape Dynamics in the New England Region of USA." *Environmental Management* (2010) 45:377–386 DOI 10.1007/s00267-009-9408-3.

[27] Ducey, Mark J. "Late-Successional and Old-Growth Forests in the Northeastern United States: Structure, Dynamics, and Prospects for Restoration." *Forests* (2013) 4, 1055-1086; doi:10.3390/f4041055.

[28] DellaSala, DA, et al. "Mature and old-growth forests contribute to large-scale conservation targets in the conterminous United States." *Front. For. Glob. Change* (2022) 5:979528. doi: 10.3389/ffgc.2022.979528

[29] Ibid.

[30] Barnett, K et al. Classifying, inventorying, and mapping mature and old-growth forests in the United States. *Front. For. Glob. Change* (2023) 5:1070372. doi: 10.3389/ffgc.2022.1070372.

Despite their exceptional value, the vast majority of mature forests on federal lands (76%), storing approximately 10.64 Gt of CO_2, are unprotected from logging.[31] This means that the unique values of intact mature and old-growth forests, including water quality enhancement, biodiversity, and carbon storage, are vulnerable to future management decisions. Old-growth represents a tiny fraction of forests in each region of the United States outside of Alaska, demonstrating the need for policies that put a greater percentage of forests on a path to recover late successional forests. Old-growth amounts to just 1.6% of South-Central US forests, 1.1% of Upper Midwest forests, .5% of Southeast US forests, and .4% of forests in the Northeast.[32]

Logging is the single greatest influence on the amount and extent of mature and old-growth forests across the US, and is easily the most preventable and avoidable threat to mature and old-growth forests when compared to fire, insects, disease, and other disturbances. Timber harvest drives 92% of annual forest carbon losses in the US South, 86% in the North, and 66% in the West. For comparison, the second greatest impacts on forest carbon in each region are as follows: West: fire (15%); South: wind damage (5%); North: insect damage (9%).[33]

Given the scarcity of old-growth forests, overall, and that the highest percentages of mature and old-growth forests fall under federal ownership (and the USFS in particular), it follows that the Forest Service has the greatest opportunity to implement measures to conserve mature and old-growth forests at scale.

Intact forests are our greatest assets in the fight against climate change

Based on the rapid decline of wildlife populations[34] and the rapid degradation of the climate,[35] scientists have suggested that much more aggressive measures must be taken to stave off climate and extinction catastrophe. The Global Deal for Nature calls for 30% of lands and waters to be permanently protected by 2030 to maintain and restore biodiversity, with at least an additional 20% percent conserved to stabilize the climate.[36]

In recent years, global attention has focused on the value of old forests because of their exceptional ability to both sequester and store carbon. There is a common misconception that young forests are better than old when it comes to removing carbon in the atmosphere. First of all, old forests store much more carbon than young forests, and they continue to

[31] DellaSala, DA, et al. "Mature and old-growth forests contribute to large-scale conservation targets in the conterminous United States." *Front. For. Glob. Change* (2022) 5:979528. doi: 10.3389/ffgc.2022.979528
[32] Davis, M.B. (ed.). "Eastern old-growth forests. Prospects for rediscovery and recovery." (1996) Island Press: Washington, D.C.
[33] Harris, NL et al. "Attribution of net carbon change by disturbance type across forest lands of the conterminous United States." *Carbon Balance Manage* (2016) 11:24 DOI 10.1186/s13021-016-0066-5.
[34] Ceballos et al 2020, *Vertebrates on the brink as indicators of biological annihilation and the sixth mass extinction*
[35] *Climate Change 2021: The Physical Science Basis*, Working Group I contribution to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change
[36] See Dinerstein et al 2019

sequester carbon over time.[37,38,39] What's more, the rate of carbon sequestration also increases as trees age,[40] and forested stands in protected wildlands have been shown to accumulate carbon at equal or faster rates than logged forests.[41]

Recent scientific advances demonstrate the capacity for secondary forests to accumulate vast amounts of carbon in the centuries ahead if we allow them to grow to their full ecological potential, a practice now widely referred to as *proforestation*.[42,43] Forests in temperate zones such as in the Eastern U.S. have a particularly high untapped capacity for carbon storage and sequestration because of high growth and low decay rates, along with exceptionally long periods between stand replacing disturbance events, similar to the moist coastal forests of the Pacific Northwest. Further, because of recent recovery from an extensive history of timber harvesting and land conversion for agriculture in the 18th, 19th, and early 20th centuries, median forest age is about 75 years,[44] which is only about 25–35% of the lifespan of many of the common tree species in these forests.

Several regional and global studies have highlighted the unique potential of eastern US temperate deciduous forests to contribute on the global stage to climate stabilization and resilience.[45,46] A study by one of the Forest Service's leading carbon experts, Richard Birdsey, notes that middle-aged Northeast US forests' carbon stocks, if allowed to grow old without direct human interference, could double their carbon stock by 2100.[47] Northeast US secondary forests have the potential to increase carbon storage two to four-fold according to a 2011 paper:

> *"…there is a significant potential to increase total carbon storage in the Northeast's northern hardwood-conifer forests. Young to mature secondary forests in the northeastern United States today have aboveground biomass (live and dead) levels of 107 Mg/ha on average (Turner et al. 1995, Birdsey and Lewis 2003). Thus, assuming a maximum potential aboveground biomass range for old-growth of approximately 250–450 Mg/ha, a range consistent with upper thresholds in our data set and the lower threshold observed at Hubbard Brook,* ***our results suggest a potential to increase in situ forest carbon storage by a factor of 2.3–4.2****, depending on*

[37] Keith et al 2009, *Re-evaluation of forest biomass carbon stocks and lessons from the world's most carbon-dense forests*
[38] Luyssaert et al 2008, *Old-growth forests as global carbon sinks*
[39] Masino et al 2021, *Older eastern white pine trees and stands sequester carbon for many decades and maximize cumulative carbon*
[40] Stephenson et al 2014, *Rate of tree carbon accumulation increases continuously with tree size*
[41] Faison, E.K. et al. "Adaptation and mitigation capacity of wildland forests in the northeastern United States." *Forest Ecology and Management* (2023) 544: 121145. https://doi.org/10.1016/j.foreco.2023.121145.
[42] Moomaw et al 2019, *Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good*
[43] Faison, E.K. et al. "Adaptation and mitigation capacity of wildland forests in the northeastern United States." *Forest Ecology and Management* (2023) 544: 121145. https://doi.org/10.1016/j.foreco.2023.121145.
[44] Forest Inventory and Analysis National Program, Forest Inventory EVALIDator web-application Version 1.8.0.00. U.S. Department of Agriculture, Forest Service, Northern Research Station, US Forest Service (2019)
[45] Dinerstein et al 2020, *A Global Safety Net to reverse biodiversity loss*
[46] Jung et al, 2020, *Areas of global importance for terrestrial biodiversity, carbon, and water*
[47] Birdsey et al 2023, Middle-aged forests in the Eastern U.S. have significant climate mitigation potential

site-specific variability. This would sequester an additional 72–172 Mg/ha of carbon [emphasis added].”[48]

In addition to their carbon benefits, old forests are also the most resilient to changes in the climate, produce the highest outputs of ecosystem services like clean water, and are superior at reducing the impacts of droughts and floods. These services protect downstream communities, purify drinking water at low cost, and maintain base flows and low temperatures in rivers during hot summers for the benefit of fish and wildlife.

In areas of the US where precipitation is on the rise due to climate change, frequent flooding and phosphorus-driven water quality degradation are among the costliest environmental crises. Mature and old forests naturally mitigate against flooding and drought by slowing, sinking, and storing water that would otherwise rapidly flow into our streams, rivers, and lakes.[49] Scientists have also shown that old forests are exceptional at removing phosphorus, a nutrient that causes eutrophication and harmful algal blooms that threaten aquatic and human health.[50] Research in New England on the impacts of logging has demonstrated that “timber harvesting is not a strategy for water supply protection that reduces contamination risk, but rather constitutes an additional and perhaps unnecessary risk to the water supply.”[51]

Protecting headwaters, many of which are located in USFS-managed roadless areas, has been identified by state governments as one of the top priorities to mitigate the effects of natural disasters and climate change.[52] After Tropical Storm Irene ravaged the Northeast US in 2011, the Vermont Department of Forests, Parks, and Recreation commissioned a report entitled “Enhancing Flood Resiliency of Vermont State Lands.” According to the report:

“There may be a tendency to assume that lands in forest cover are resilient to the effects of flooding simply by virtue of their forested status. However, forest cover does not necessarily equate to forest health and forest flood resilience. Headwater forests of Vermont include a legacy of human modifications that have left certain land areas with a heightened propensity to generate runoff, accelerate soil erosion, and sediment streams. These legacy impacts affect forest lands across the state... The quality of [today’s] forests is not the same as the pre-Settlement old growth forests. The legacy of early landscape development and a history of channel and floodplain modifications continue to impact water and sediment routing from the land.”[53]

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[48] Keeton et al 2011, *Late-Successional Biomass Development in Northern Hardwood-Conifer Forests of the Northeastern United States*

[49] Underwood and Brynn 2015, *Enhancing Flood Resiliency of Vermont State Lands*

[50] Warren et al 2018, “Forest Stream Interactions in Eastern Old-Growth Forests” (in *Ecology and Recovery of Eastern Old Growth Forests*)

[51] FB Envtl. Assocs. et al, *A Regulatory, Environmental, and Economic Analysis of Water Supply Protection in Auburn, Maine* 40 (October 2021), *available at* https://www.auburnmaine.gov/CMSContent/City_Manager/LakeAuburn_FinalReport%20UPDATED.pdf.

[52] Vermont Stronger: Vermont Hazard Mitigation Plan, Vermont Emergency Management, 2018

[53] See Underwood and Brynn

A recent peer-reviewed study of forests in the Northeastern US and upper Midwest found that:

> *"[Older forests] simultaneously support high levels of carbon storage, timber growth, and species richness. Older forests also exhibit low climate sensitivity…compared to younger forests… Strategies aimed at enhancing the representation of older forest conditions at landscape scales will help sustain [ecosystem services and biodiversity] in a changing world."*
>
> *"Although our analysis suggests that old forests exhibit the highest combined [ecosystem services and biodiversity (ESB)] performance, less than 0.2% of the investigated sites are currently occupied by forests older than 200 years.* ***This suggests a large potential to improve joint ESB outcomes in temperate and boreal forests of eastern North America by enhancing the representation of late-successional and older forest stand structures****…[emphasis added]"*[54]

Intact forests protect and enhance native biodiversity

Areas protected from extraction preserve and restore the greatest levels of biodiversity across the globe.[55,56,57,58] Large blocks of roadless forests minimize harmful vectors for the spread of invasive species,[59,60] and allow natural disturbances to play out across a sufficiently large landscape to ensure that there is a mix of early and late successional habitats required by the full spectrum of forest-dependent species.[61] Numerous recent studies have investigated the benefits of roadless areas for biodiversity.[62,63]

Decision-makers and the public should understand that what we call "old forests" are *natural forests* composed of trees of all age classes, standing dead and downed wood, and canopy gaps from natural disturbances including wind, ice, fire, and beavers. As such, much of North America's community of life evolved over millennia within these remarkable forests alongside the continent's indigenous cultures. In just the blink of an eye, a combination of overhunting and habitat loss following European settlement led to the disappearance of wide-ranging carnivores and other large mammals. Many of the nation's most imperiled bird species are adapted to interior forests and rely upon complex forest structure for their survival, including standing snags and large living trees.[64] Indeed, the

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[54] Thom et al 2019, *The climate sensitivity of carbon, timber, and species richness covaries with forest age in boreal–temperate North America*

[55] Watson et al 2018, *The exceptional value of intact forest ecosystems*

[56] DiMarco et al 2019, *Wilderness areas halve the extinction risk of terrestrial biodiversity*

[57] Dinerstein et al 2020, *A Global Safety Net to reverse biodiversity loss*

[58] Miller et al 2018, *Eastern national parks protect greater tree species diversity than unprotected matrix forests*

[59] Mortensen et al 2009, *Forest Roads Facilitate the Spread of Invasive Plants*

[60] Healey 2020, *Long-term forest health implications of roadlessness*

[61] Kellett et al., *Forest-clearing to Create Early-successional Habitats: Questionable Benefits, Significant Costs*, 5 FRONTIERS FOR GLOB. CHANGE 1 (Jan. 9, 2023)

[62] Talty et al 2020, "Conservation value of national forest roadless areas" https://doi.org/10.1111/csp2.288

[63] Dietz et al 2021, "The importance of U.S. national forest roadless areas for vulnerable wildlife species" https://doi.org/10.1016/j.gecco.2021.e01943

[64] Askins 2015, *The Critical Importance of Large Expanses of Continuous Forest for Bird Conservation*

availability of dead, dying, and downed wood (increasingly removed from forests for biofuels, mass timber, or other uses of so-called "low-grade wood") is critical for the health of many species, from bats to pine marten to a wide range of invertebrates.[65]

Three species (of many) that are especially dependent upon older forests in the Northeast and which are teetering on the brink of extirpation are the American marten, brook trout, and Northern Long-eared Bat:

- ***American marten***
  The American marten is a Species of Greatest Conservation Need in New Hampshire and is listed as a Vermont state endangered species. New Hampshire Fish and Game describes marten habitat as "[m]ixed deciduous and coniferous forests with a variety of horizontal and vertical structure. Conifer cover is important during winter and course [sic] woody debris on the ground provides denning and nesting sites and refuge from predators. Typically found in spruce-fir forests above 2,700 feet in elevation."[66] Such habitat is found in high concentrations in Roadless Rule and Forest Plan IRAs across both the WMNF and GMNF. Conversely, such habitat is much rarer across the remainder of New England. A 2022 study found (among other conclusions) that 1) snow depth positively affected marten colonization and decreased risk for extirpation, and 2) that "areas that had more recent, or more intense, timber removal activities had lower probability of initial occupancy (marten), lower colonization probability (marten and fisher), and higher probability of extinction (marten and fisher). This is consistent with literature, indicating that forest modification is detrimental to habitat quality for marten and fisher…"[67]

  Importantly, the WMNF Forest Plan EIS assumed that IRAs would be managed as such for the duration of the Forest Plan in determining impacts to the American marten: "most areas that currently lack roads, including Inventoried Roadless Areas, will remain in this condition for the foreseeable future."[68] Conversely, the GMNF Forest Plan EIS assumed that marten were not present, and therefore no analysis was performed regarding management of suitable habitat.[69] Since the Forest Plan was published in 2006, a marten population has become established in the Glastenbury Wilderness and IRA, but the Forest Plan was never updated to reflect this important change in conditions. Any changes to IRA management would necessitate detailed study of impacts to marten across both the WMNF and GMNF.

- ***Brook trout***
  Brook trout are another species that is especially dependent on mature and old forests and unfragmented habitat, features that are disproportionately present in

[65] Thorn et al 2020, *The living dead: acknowledging life after tree death to stop forest degradation*
[66] American Marten (Martes Americana), NH Fish and Game. Available here https://www.wildlife.nh.gov/wildlife-and-habitat/species-occurring-nh/american-marten.
[67] Evans and Mortelliti 2022, "Effects of forest disturbance, snow depth, and intraguild dynamics on American marten and fisher occupancy in Maine, USA."
[68] WMNF 2005 Forest Plan FEIS, Chapter 3 Environmental Effects at 3-198.
[69] GMNF 2006 Forest Plan FEIS, Chapter 3 Affected Environment and Environmental Consequences at 3-157.

the GMNF and WMNF and especially within Roadless Rule and Forest Plan IRAs. According to the WMNF FEIS, "Brook trout are a key indicator of coldwater aquatic ecosystems, and are typically the only fish species found in the high elevations of eastern mountain streams… A large percentage of coldwater streams in New Hampshire occur within the National Forest. According to the New Hampshire Department of Environmental Service fish surveys from 1997 to 2001, brook trout were absent or rare in nearly 70 percent of 160 sample sites across the state. By comparison, brook trout composed more than 50 percent of fish collected at over 40 percent of sample sites within the Forest."[70]

A report by Trout Unlimited found that "[i]ntact stream populations of brook trout (where wild brook trout occupy 90-100% of their historical habitat) exist in only 5% of subwatersheds" (including 8% of New Hampshire subwatersheds and 14% of Vermont subwatersheds).[71] The same report found that of all threats to brook trout, road sedimentation was the leading risk factor in Vermont and New Hampshire, impacting 79% of subwatersheds in Vermont and 45% of subwatersheds in New Hampshire.[72] Rescinding the Roadless Rule would have significant negative consequences for brook trout, and these impacts must be carefully accounted for in the EIS.

- ***Northern Long-eared Bat***

  Another species of great concern is the Northern Long-eared Bat (NLEB), which was listed as endangered on November 30, 2022.[73] Much of New England is within the NLEB's range.[74] However, the U.S. Fish and Wildlife Service ("USFWS") indicated in a Biological Opinion ("BiOp") dated March 31, 2023 that the agency is "uncertain where the NLEB occurs on the landscape outside of known locations."[75] Therefore, the Forest Service must take a "hard look" at likely site-specific and cumulative impacts of the proposed rescission of the Roadless Rule on sensitive species such as the NLEB.

  The BiOp further states that habitat loss is a primary factor threatening the NLEB's viability and exacerbating the devastating impacts of white-nose syndrome.[76] As Standing Trees has explained in many previous comments,[77] NLEB habitat

[70] WMNF 2005 Forest Plan FEIS, Chapter 3 Environmental Effects at 3-60.
[71] "Eastern Brook Trout: Status and Threats" (2006). Trout Unlimited.
[72] Ibid
[73] 87 Fed. Reg. 73,488 (Nov. 30, 2022).
[74] USFWS, FWS/R3/ES-ARD, *Biological Opinion: Effects to the Northern Long-Eared Bat from Planned and Ongoing Activities Being Implemented in the Eastern and Southern Regions of the U.S. Forest Service* 8 (Mar. 30, 2023) (available in Tarleton IRP project file at filename Biological Opinion NLEB Reinitiation Forest Service R8 and R9 Final.pdf) (hereinafter "NLEB BiOp").
[75] Letter from Karen Herrington, Acting Asst. Reg'l Director for Ecological Servs., Region 3 USFWS, to Gina Owens, Reg'l Forester Eastern Region U.S. Forest Service 2 (Mar. 31, 2023) (re: NLEB BiOp) (in Tarleton IRP project file at filename Biological Opinion NLEB Reinitiation Forest Service R8 and R9 Final.pdf)
[76] NLEB BiOp at 19.
[77] Standing Trees Sandwich Comment at 22; Standing Trees Peabody West Objection at 17–18; Standing Trees Lake Tarleton Objection at 21.

requirements are the opposite of the type of habitat that will be generated from the Lost River IRP if the Project proceeds as proposed. According to the USFWS Species Status Assessment for the NLEB, dated March 22, 2022, the bat depends on mature and old forests for roosting and foraging.[78] Its preferred roosting habitat is large-diameter live or dead trees of a variety of species, with exfoliating bark, cavities, or crevices. Additionally, "mature forests are an important habitat type for foraging NLEBs[,]" and "most foraging occurs . . . under the canopy . . . on forested hillsides and ridges."[79] Furthermore, NLEBs "prefer intact mixed-type forests . . . for forage and travel rather than fragmented habitat or areas that have been clear cut."[80] Given that the Lost River IRP would create more early-successional habitat and would potentially remove mature or maturing stands that serve as NLEB habitat,[81] the Forest Service must fully investigate and analyze the likely impacts of Roadless Rule rescission to NLEB populations.

Protecting roadless forests is an essential strategy for recovering old forests and unleashing their ecosystem services

Despite the clear scientific evidence for increased amounts of old, wild forest for climate stabilization and resilience,[82] only a small percentage of forestlands across the US are managed to maintain or regain the characteristics of natural, old forest ecosystems. National Forests harbor the majority of the nation's permanently protected forestland, primarily within approximately 36.7 million-acres of Congressionally-designated Wilderness, or about 19% of all USFS lands.[83] Restoring old growth forests via the protection and expansion of the Roadless Rule is a low cost, scientifically proven, rapidly deployable strategy that can be applied at scale. Especially in forest types with a low-frequency of high-intensity disturbances, such as most of USFS Regions 8 and 9, all that's typically required to restore old forest conditions is time.[84]

According to the USDA Forest Service Roadless Area Conservation webpage as of 2023, "Inventoried roadless areas constitute roughly one-third of all National Forest System lands... Although the inventoried roadless areas comprise only 2% of the land base in the continental United States, they are found within 661 of the over 2,000 major watersheds in the nation and provide many social and ecological benefits."

The text of the 2001 Roadless Rule is instructive:

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[78] *Species Status Assessment* at 18.
[79] *Id*.
[80] *Id*. at 18–19.
[81] Scoping Letter at 6 ("Compared to other silvicultural treatments, clearcutting would produce the greatest amount of early-successional habitat.")
[82] Moomaw et al 2019, *Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good*
[83] Wilderness.net: "Acreage by Agency." Available at https://wilderness.net/practitioners/wilderness-areas/summary-reports/acreage-by-agency.php
[84] Faison E.K. et al. "The importance of natural forest stewardship in adaptation planning in the United States." *Conservation Science and Practice* (2023) 5(6): e12935. https://doi.org/10.1111/csp2.12935.

"In the future, expanding urban areas and increased fragmentation of private lands make it likely that the largest and most extensive tracts of undeveloped land will be those in public ownership…

"This final rule prohibits road construction, reconstruction, and timber harvest in inventoried roadless areas because they have the greatest likelihood of altering and fragmenting landscapes, resulting in immediate, long-term loss of roadless area values and characteristics. Although other activities may also compromise roadless area values, they resist analysis at the national level and are best reviewed through local land management planning. Additionally, the size of the existing forest road system and attendant budget constraints prevent the agency from managing its road system to the safety and environmental standards to which it was built. Finally, national concern over roadless area management continues to generate controversy, including costly and time-consuming appeals and litigation…

Inventoried roadless areas provide clean drinking water and function as biological strongholds for populations of threatened and endangered species. They provide large, relatively undisturbed landscapes that are important to biological diversity and the long-term survival of many at risk species. Inventoried roadless areas provide opportunities for dispersed outdoor recreation, opportunities that diminish as open space and natural settings are developed elsewhere. They also serve as bulwarks against the spread of non-native invasive plant species and provide reference areas for study and research."[85]

Roadless areas contain large amounts of mature and old-growth forests.[86] The full protection of all IRAs in USFS management, both those currently protected by the 2001 Roadless Area Conservation Rule and IRAs that have been identified after 2001 through Forest Plan revisions, will have exceptional value for biodiversity, flood and drought risk reduction, and more.[87,88,89]

<u>If the Forest Service proceeds with rescinding the Roadless Rule, an EIS should review an alternative that extends Roadless Rule protections to all Forest Plan IRAs</u>

The US Forest Service should take immediate action to end its prejudicial, two-class system of Inventoried Roadless Areas (IRAs) so that all IRAs are afforded equal protection under the 2001 Roadless Area Conservation Rule (Roadless Rule). Currently, IRAs that were inventoried after the promulgation of the Roadless Rule, such as during a post-2001 Forest Plan revision process, lack the administrative protections afforded to pre-2001 IRAs. Such a

[85] Special Areas; Roadless Area Conservation; Final Rule. 36 CFR Part 294. ("2001 Roadless Area Conservation Rule")
[86] DellaSala, D.A. et al. "Mature and old-growth forests contribute to large-scale conservation targets in the conterminous United States." *Frontiers in Forests and Global Change* (2022) 5. https://doi.org/10.3389/ffgc.2022.979528.
[87] Talty et al 2020, "Conservation value of national forest roadless areas" https://doi.org/10.1111/csp2.288
[88] Dietz et al 2021, "The importance of U.S. national forest roadless areas for vulnerable wildlife species" https://doi.org/10.1016/j.gecco.2021.e01943
[89] Dellasala et al 2011, "Roadless Areas and Clean Water" https://doi.org/10.2489/jswc.66.3.78A

change should be evaluated as an alternative if the Forest Service proceeds with its EIS for rescinding the Roadless Rule.

The WMNF and GMNF are ground zero for the USFS's inequitable application of roadless area protections. The 2001 Roadless Rule afforded administrative protections to 25,000-acres of Inventoried Roadless Areas on the GMNF and 235,000-acres on the WMNF.[90] However, subsequent roadless area inventories conducted during Forest Plan revisions identified significant amounts of additional roadless acreage (known as Forest Plan IRAs). The 2006 GMNF Forest Plan revision resulted in 99,321 additional IRA acres beyond 2001 totals.[91] Meanwhile, the 2005 WMNF Forest Plan revision resulted in 155,000 additional IRA acres beyond 2001 totals.[92] Collectively, the new IRAs doubled New England's total IRA acreage across the GMNF and WMNF.

Instead of putting these invaluable intact forest landscapes under the protection of the Roadless Rule, the USFS arbitrarily decided to allocate Forest Plan IRAs to a wide variety of Forest Plan management areas that permit road building and timber harvest. The tragic result has been a spate of road construction and logging within inventoried roadless areas, and additional projects targeting Forest Plan IRAs are currently under development. Examples of projects that have either approved or are proposing logging in Forest Plan IRAs include (but are not limited to) the Early Successional Habitat Creation Project, Robinson Integrated Resource Project, Peabody West Integrated Resource Project, Sandwich Vegetation Management Project, Telephone Gap Integrated Resource Project, and Lost River Integrated Resource Project, among others.

Logging roadless forests is a waste of taxpayer money and degrades their ecosystem service value

If the damage to water resources, biodiversity, and carbon storage weren't enough reason to prevent the rescission of the Roadless Rule, perhaps the cost to taxpayers should tip the scales. A recent study of ecosystem services provided by Vermont state and federal public lands determined that "Vermont's Public Conservation Lands supply $2.25 billion in ecosystem services each year. The most valuable services are, in order, Recreational Opportunities, Air Quality Regulation, Climate Regulation, Existence & Bequest Value, and Moderation of Extreme Events, together accounting for over 88% of the total estimated ESV. In contrast, the value of timber from these public lands represents only about 0.13% of the other ESV. Managing these lands for their ecological integrity ensures the continued flow of substantial public values with minimal opportunity cost in terms of statewide timber production."[93] The Roadless Rule serves to maintain and enhance these essential ecosystem services.

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[90] USDA Forest Service Roadless Area Conservation Rule, Appendix A. Available at: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsm8_037652.htm

[91] USDA Forest Service Green Mountain National Forest, 2006 Forest Plan, Appendix C. Available at: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsbdev3_064861.pdf

[92] Fink et al 2009, *Saving our Natural Legacy: The Future of America's Last Roadless Forests*.

[93] Phillips 2025, "The Economic Value of Vermont's Public Conservation Lands"

With a system total of 375,000 miles, the US Forest Service manages more road miles than nearly any other government agency in the world, and this figure excludes "non-system" roads that are also often present within USFS-managed lands.[94]

The 2001 Roadless Rule notes that protecting roadless areas is a smart financial decision as well as an ecological one:

> *"The [US Department of Agriculture] is also concerned about building new roads in inventoried roadless areas, when there presently exists a backlog of about $8.4 billion in deferred maintenance and reconstruction on the more than 386,000 miles of roads in the Forest Transportation System [(the maintenance backlog is presently estimated to be $10.8 billion, as previously noted)]. The agency estimates that at least 60,000 miles of additional unauthorized roads exist across National Forest System lands.*
>
> *"The agency receives less than 20% of the funds needed annually to maintain the existing road infrastructure. As funding needs remain unmet, the cost of fixing deteriorating roads increases exponentially every year. Failure to maintain existing roads can also lead to erosion and water quality degradation and other environmental problems and potential threats to human safety. It makes little fiscal or environmental sense to build additional roads in inventoried roadless areas that have irretrievable values at risk when the agency is struggling to maintain its existing extensive road system (FEIS Vol. 1, 1-5 and 3-22). The National Forest System was founded more than 100 years ago to protect drinking water supplies and furnish a sustainable supply of timber. Neither objective is fully achievable given the present condition of the existing road system. The risks inherent in building new roads in presently roadless areas threaten environmental, social, and economic values.*
>
> *"Development activities in inventoried roadless areas often cost more to plan and implement than on other National Forest System lands. Some planned timber sales in inventoried roadless areas are likely to cost more to prepare and sell than they realize in revenues received."*[95]

A 2019 report by the Center for a Sustainable Economy found that the US Forest Service timber harvest program loses approximately $1.3 to $1.5 billion annually, *not including* harvests related to fire suppression.[96]

In large part because of the cost of road maintenance and construction, neither the WMNF nor GMNF anticipated significant amounts of road construction over the time horizons of the current Forest Plans. The GMNF 2006 Forest Plan FEIS states that "[n]o temporary roads have been constructed d [sic] the past 10 years. Construction of logging roads for timber harvest by loggers has also been minimal. These roads are not generally open to the public and are rehabilitated after use. Miles of road maintenance have also been well below predicted levels because of reduced budgets. Basing predictions for new road development

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[94] Wildlands CPR: "Rightsizing the Forest Service Road System."
[95] Special Areas; Roadless Area Conservation; Final Rule. 36 CFR Part 294. ("2001 Roadless Area Conservation Rule")
[96] Talberth and Niemi 2019, *Environmentally Harmful Subsidies in the US. Issue #1: The federal logging program.*

in the foreseeable future on what has occurred over the past Plan period follows the logic that construction of new permanent or temporary roads is not expected to differ much from that of the recent past… Based on the relatively minor potential increase in new road development, temporary new roads, and road maintenance, through current projects or in the foreseeable future, there would be no measurable cumulative impact in regards to the issue of planning for and managing roads and the transportation system in the short and long-term."[97] Similarly, the WMNF noted in its 2005 Forest Plan FEIS that "[a]ctual new [road] construction will be minimal," amounting to an estimated 1 mile per year for each considered alternative.[98]

Clearly, if the Forest Service intends to rescind the Roadless Rule and increase road construction and reconstruction, it will have to do a careful Forest-by-Forest analysis to determine how such a major change to land management policy and direction would result in environmental impacts beyond those contemplated by existing Forest Plans.

The Roadless Rule protects unparalleled recreation opportunities

As mentioned previously, the Roadless Rule does not restrict recreational uses. To the contrary, the Rule provides exceptional recreational opportunities that are rare on other public or private lands in the Northeast and across the nation. Because of their size and scale, IRAs offer unique opportunities for solitude, spiritual or religious contemplation, and restoration of mental health. Roadless Areas are often the gateway or portal to other protected lands, including Congressionally-designated National Recreation Areas, Wilderness areas, Forest Plan Scenic Areas, and similar designations. In this way, IRAs provide continuity of experience to the recreating public from the trailhead to mountain summits. In New Hampshire, two excellent examples that illustrate this point are the Pemigewasset IRA in Franconia Notch, which harbors popular trails to Franconia Ridge, and the Great Gulf IRA on the north slopes of the Presidential Range, which protect popular trails to the highest summits in the Northeast. Finally, the Roadless Rule is an essential tool for protecting long-distance trails that attract many thousands of visitors to the Northeast (and other regions of the country) each year, including the Appalachian National Scenic Trail, the Long Trail, and the Cohos Trail. Each of these trails pass through the heart of numerous IRAs on the Green and White Mountain National Forests. If the Forest Service proceeds with this EIS, it must analyze how impacts to surrounding IRAs would degrade these and other recreational opportunities.

Keep the Roadless Rule intact and Expand its Protections

For all of the reasons mentioned above, we oppose the rescission of the Roadless Rule. If the Forest Service proceeds with its EIS, it must consider (at a minimum) all of the unique local and regional impacts that would stem from the rescission, as well as an alternative that extends RACR protections to all Forest Plan IRAs, as well.

[97] GMNF 2006 Forest Plan FEIS, Affected Environment and Environmental Consequences at 3-351.
[98] WMNF 2005 Forest Plan FEIS, Environmental Effects at 3-30.

In the words of retired Forest Service Chief, Dale Bosworth: “The 2001 Roadless Area Conservation Rule was a landmark accomplishment of the USDA Forest Service. Our nation's Inventoried Roadless Areas protect essential headwaters, save taxpayers money by directing forestry activities to appropriate landscapes, and provide unparalleled opportunities for families seeking backcountry experiences in settings that allow for a wider range of recreational access than designated Wilderness. Importantly, the Roadless Rule secures these benefits while also providing line officers full power to preemptively reduce wildfire danger to communities, and to fight fires when necessary. The Roadless Rule is working for America's National Forest System and it's working for the American taxpayer. As we say, ‘if it ain't broke, don't fix it.’”[99]

Thank you for your careful consideration of these comments.

Sincerely,

Zack Porter
Executive Director
Standing Trees

On behalf of the following organizations (continues on next page):

350 Central Mass
350 Mass
Adirondack Council
Biofuelwatch
Boston Catholic Climate Movement
Canton Residents for a Sustainable Equitable Future
Climate and Democracy Project
Climate Communications Coalition
Climate Writers
Elders Climate Action - Massachusetts Chapter
Friends of Bell Smith Springs
Friends of Blackwater, Inc.
Greenfield Solar
Hilltown Vision

[99] “What They Are Actually Saying – and What The Trump Administration is Ignoring: Roadless Rule Rescission.” https://democrats-naturalresources.house.gov/media/press-releases/what-they-are-actually-saying_and-what-the-trump-administration-is-ignoring-roadless-rule-rescission

Keep the Woods
Kucinich Institute for Human and Ecological Security
MASS PLAN
Massachusetts Forest Watch
Mountain Sense LLC.
North American Climate, Conservation and Environment(NACCE)
North Country Alliance for Balanced Change
Partnership for Policy Integrity
Peace of Mind Reiki
Pipe Line Awareness Network for the Northeast
Ridgeview Conservancy
Slingshot
Soda Mountain Wilderness Council
Speak For The Trees Too, WV
Standing Trees
Stop Vermont Biomass
Tennessee Heartwood
Third Act Massachusetts
Third Act Vermont
Trees as a Public Good Network
Wendell State Forest Alliance
Wild Hope
Wonalancet Out Door Club
Worcester Congregations for Climate and Environmental Justice