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Connecticut River Conservancy

October 5, 2026

Joshua White

USDA, U.S. Forest Service Acting Director, Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

Re: CRC Comments Opposing Rescission of the 2001 Roadless Area Conservation Rule - Docket No. FS-2025-0001

Dear Joshua White, USDA Forest Service Acting Director of Ecosystem Management Coordination,

The Connecticut River Conservancy (CRC) respectfully submits these comments in strong opposition to the proposed rescission of the 2001 Roadless Area Conservation Rule (Roadless Rule). CRC is a nonprofit organization, established in 1952, dedicated to protecting and restoring the Connecticut River and its tributaries and supporting clean water, healthy habitats, and resilient communities throughout the Connecticut River watershed. Our interests include improving water quality; restoring aquatic habitat and river connectivity; protecting fish, wildlife, and threatened and endangered species; conserving wetlands and riparian areas; enhancing public access and recreation; and safeguarding scenic, cultural, and historic resources.

The White Mountain and Green Mountain National Forests are integral to the health of the Connecticut River watershed. Their forests, wetlands, headwater streams, and roadless areas provide critical ecological functions that extend far beyond the boundaries of the National Forests themselves. These lands protect headwaters, regulate water temperatures and flows, retain sediment and nutrients, support wildlife habitat, enhance biodiversity, bolster the outdoor recreation and tourism economy, and provide clean water to communities throughout New Hampshire, Vermont, Massachusetts, Connecticut, and beyond.

For these reasons, CRC urges the U.S. Forest Service to retain the 2001 Roadless Rule and select Alternative 1 - No Action, in the draft Environmental Impact Statement (DEIS).

Roadless areas are an essential component of protecting the Connecticut River watershed

The Connecticut River begins in the forests and wetlands of Pittsburg, New Hampshire and flows 410 miles south to the Long Island Sound in Connecticut. The health of this entire river system depends upon the condition of its upstream forests and headwaters.

The White Mountain National Forest contains some of the most important headwater landscapes in the upper Connecticut River watershed. Roadless areas in the Presidential Range, Franconia Ridge, Mount Moosilauke, and surrounding areas contain headwaters and tributaries that feed into the Connecticut River system. These forests function as natural infrastructure - they capture and slowly release precipitation, promote infiltration, stabilize soils, shade waterbodies, and reduce the delivery of sediment and pollutants

to downstream waters. The Green Mountain National Forest plays a similar role on the Vermont side of the watershed. Roadless lands within and surrounding the Green Mountains protect headwaters and tributaries of rivers that ultimately connect to the Connecticut River.

Approximately 260,000 acres of roadless land in the White and Green Mountain National Forests are protected by the Roadless Rule. These areas include some of the region's most intact forest landscapes and provide important buffers around designated wilderness and other protected wildlife areas. Removing the Roadless Rule would not merely affect National Forest land, it would alter the management framework for upper watershed areas whose ecological impacts extend downstream throughout the entire Connecticut River watershed.

Scientific evidence demonstrates the importance of Roadless Rule protections to rivers and drinking water

A 2026 peer-reviewed study published in the Public Library of Science (PLOS) Water, “*Assessing the value of the U.S. Roadless Rule for people and nature*,” provides important new scientific evidence that should be incorporated into the Forest Service's analysis. Julian D. Olden, Sandra L. Postel, Michael P. Dombeck, Helen Kesting, Patrick Freeman, and Lise Comte evaluated 2,488 Inventoried Roadless Areas across the United States and found that they protect approximately 131,316 kilometers (more than 81,500 miles) of rivers, representing approximately 2.5% of total river length in the United States.¹ These rivers provide clean drinking water to approximately 25 million Americans.²

The study also demonstrates why the Forest Service must evaluate watershed impacts beyond the boundaries of individual roadless areas and National Forests. Because rivers transport sediment, nutrients, pollutants, and other materials downstream, the researchers examined watersheds both within roadless areas and downstream of them. They found that 9,909 watersheds are influenced by Inventoried Roadless Areas, including watersheds located as far as 100 river miles downstream.³

In the Connecticut River watershed, the ecological benefits of intact headwater forests do not end at the National Forest boundary - changes to forest cover, soil disturbance, drainage patterns, and roads in headwater areas can spread downstream through tributaries and into the Connecticut River itself. These findings reinforce a fundamental watershed management principle - protecting forested headwaters is one of the most effective ways to protect water quality downstream. The Long Island Sound in Connecticut is the mouth of the Connecticut River, and has experienced numerous dead zones - a result of increased concentrations of nitrogen and phosphorus. Seventy percent of the freshwater entering Long Island Sound comes from the Connecticut River.⁴ Keeping forests undeveloped helps filter these nutrients and other pollutants, so they do not impact local and downstream waterways.

There is a clear economic benefit of clean drinking water that comes from roadless areas. Intact forests help protect water quality and reduce downstream treatment and infrastructure costs. The White Mountain

¹ Olden JD, Postel SL, Dombeck MP, Kesting H, Freeman P, Comte L (2026) Assessing the value of the U.S. Roadless Rule for people and nature. PLOS Water 5(7): e0000538.
<https://doi.org/10.1371/journal.pwat.0000538>

² [The Roadless Rule and Rivers | American Rivers](#)

³ Olden JD, Postel SL, Dombeck MP, Kesting H, Freeman P, Comte L (2026) Assessing the value of the U.S. Roadless Rule for people and nature. PLOS Water 5(7): e0000538.
<https://doi.org/10.1371/journal.pwat.0000538>

⁴ [The Connecticut River Watershed Partnership Act — Connecticut River Watershed Partnership](#)

National Forest contains headwaters that provide drinking water to communities in multiple states. In New England, the Roadless Rule helps to protect drinking water for 8.8% of Vermont residents and 7.3% of New Hampshire residents.⁵ And the positive impacts of roadless areas can be felt many miles from those areas. For example, 7% of Massachusetts residents get their water from sources that originate in Inventoried Roadless Areas in the White Mountain National Forest.⁶ In total, six million people rely on the Connecticut River for their drinking water.⁷

Road construction and logging can degrade river health

CRC is particularly concerned about the consequences of increased road construction and associated timber harvesting in currently protected roadless areas. Forest roads require clearing, grading, drainage infrastructure, stream crossings, and ongoing maintenance. Roads can create direct pathways for sediment and pollutants to enter streams and can alter the way water moves across a watershed, resulting in potential risks to wildlife and water quality.

The PLOS Water study identifies several mechanisms by which forestry and associated roads can affect aquatic ecosystems, including increased sedimentation, altered stream hydrology, reduced riparian shade, increased water temperatures, bank erosion, and changes to aquatic habitat.⁸ These impacts are especially significant in mountainous New England watersheds, where steep slopes, freeze-thaw cycles, and increasingly frequent extreme rainfall events can exacerbate erosion and runoff.

For the Connecticut River watershed, protecting intact forest cover is therefore not simply a matter of preserving scenic landscapes - it is a necessary water-quality strategy. Forested watersheds intercept precipitation through infiltration, stabilizing soils, and filtering contaminants before they reach waterbodies. Intact forests reduce turbidity and sediment loads and help maintain more stable and resilient water flows and better water quality.

The Forest Service should therefore fully evaluate the cumulative watershed consequences of additional roads, forest clearing, and timber harvesting that could become permissible following the potential rescission of the Roadless Rule. The environmental and economic benefits of intact forests militate the No Action Alternative.

Roadless forests provide critical habitat and wildlife connectivity

The White and Green Mountain National Forests are important wildlife habitats within the Connecticut River watershed. Roadless forests provide large, intact sections of habitat and help maintain habitat and connectivity between protected areas. This connectivity is increasingly important as climate change alters

⁵ Olden JD, Postel SL, Dombeck MP, Kesting H, Freeman P, Comte L (2026) Assessing the value of the U.S. Roadless Rule for people and nature. PLOS Water 5(7): e0000538.

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⁶ Olden JD, Postel SL, Dombeck MP, Kesting H, Freeman P, Comte L (2026) Assessing the value of the U.S. Roadless Rule for people and nature. PLOS Water 5(7): e0000538.

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⁷ [The Connecticut River Watershed Partnership Act — Connecticut River Watershed Partnership](#)

⁸ Olden JD, Postel SL, Dombeck MP, Kesting H, Freeman P, Comte L (2026) Assessing the value of the U.S. Roadless Rule for people and nature. PLOS Water 5(7): e0000538.

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seasonal conditions and species movement and migratory patterns. Roadless areas provide important habitat for species that require large, relatively undisturbed landscapes. Keeping these areas intact and whole is particularly valuable as climate change amplifies ecological stress and makes connected habitat increasingly important for species movement and adaptation.

The PLOS Water study evaluated 1,510 native aquatic animal species - including fish, amphibians, crustaceans, mollusks, and turtles - and found that nearly one-fifth of watersheds influenced by Inventoried Roadless Areas ranked within the top quartile for aquatic biodiversity within their respective states.⁹ The study's findings are consistent with what river organizations and land activists have long recognized: healthy upland forests, healthy rivers, and healthy wildlife are interconnected and inseparable. Forest fragmentation and increased road density can reduce habitat connectivity and increase the spread of invasive species.

In the United States, 70% of public lands within roadless areas are home to native trout and salmon.¹⁰ Specifically in the East, roadless areas safeguard critical habitat, with 90% in New Hampshire supporting native trout populations.¹¹ There are numerous studies that have demonstrated that roads negatively impact fish populations by causing water quality degradation from increased sediment and pollutants, as well as altered stream channels, fragmented habitat, and fish barriers. Keeping the Roadless Rule in place means preserving the natural conditions, including water quality and temperature, for trout and other native species to survive. In the Connecticut River watershed, intact forested headwaters support cold-water fisheries, aquatic organisms, amphibians, birds, mammals, and other wildlife.

The White and Green Mountain National Forests provide environmental and economic benefits to communities throughout the Connecticut River watershed

The U.S. Forest Service should not evaluate the Roadless Rule solely in terms of what happens within the boundaries of an individual Inventoried Roadless Area. The Connecticut River is an interconnected system - water originating in the White or Green Mountains moves through tributaries, wetlands, and communities before reaching the mainstem Connecticut River and eventually the Long Island Sound and Atlantic Ocean. A decision that increases disturbance in upstream watersheds can therefore affect communities and ecosystems hundreds of miles downstream.

This is precisely why the PLOS Water study evaluated downstream watersheds. The researchers found that downstream communities can receive significant drinking-water benefits from upstream roadless forests, even when those communities are far outside National Forest land boundaries.¹² For the Connecticut River watershed, this means that the Forest Service should evaluate the benefits of roadless protections to downstream municipalities, public water systems, farms, businesses, anglers and hunters,

⁹ Olden JD, Postel SL, Dombeck MP, Kesting H, Freeman P, Comte L (2026) Assessing the value of the U.S. Roadless Rule for people and nature. PLOS Water 5(7): e0000538.
<https://doi.org/10.1371/journal.pwat.0000538>

¹⁰ Trout Unlimited. 2015. State of the Trout: A Report on the Status and Trends of Native Trout in the United States. Trout Unlimited, Arlington, Virginia.

¹¹ [Roadless Areas - Defending America's Sporting Lands - Trout Unlimited](#)

¹² Olden JD, Postel SL, Dombeck MP, Kesting H, Freeman P, Comte L (2026) Assessing the value of the U.S. Roadless Rule for people and nature. PLOS Water 5(7): e0000538.
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recreators, and river-dependent communities - not only to visitors or tourists who are exploring the roadless lands themselves.

The White Mountain and Green Mountain National Forests are critical economic assets for the outdoor recreation and tourism economies of New Hampshire and Vermont. The White Mountain National Forest receives approximately six million visitors annually. New Hampshire's outdoor recreation economy generated approximately \$4.2 billion in 2024 - representing 3.5% of the state's GDP - supported more than 33,000 jobs, and generated approximately \$1.8 billion in wages.¹³ Vermont's outdoor recreation economy generated approximately \$2.1 billion in 2023, representing 4.8% of the state's GDP and supporting approximately 16,283 jobs.¹⁴ These economic benefits extend well beyond the National Forest boundaries to lodging, restaurants, retailers, guides, ski areas, equipment manufacturers, and other local businesses. Visitors are drawn to these regions because of their forests, rivers, wildlife, scenic landscapes, and opportunities for relatively undeveloped recreation. Outdoor recreation is a central pillar of the economic landscape in New England. In the four state Connecticut River Watershed (NH, VT, MA, CT), outdoor recreation is a \$27 billion industry.¹⁵ Rescinding the Roadless Rule will put these economic benefits at risk by allowing increased road construction, development, and fragmentation in currently protected landscapes that attract millions of visitors each year, who are drawn precisely to the beauty of intact, natural, and undisturbed forests.

The Forest Service should fully evaluate climate resilience and cumulative environmental and economic impacts

The Connecticut River watershed is already experiencing increasing pressures from extreme precipitation, flooding, drought, increasing temperatures, and other climate-related stressors. Intact forests provide a natural framework that helps communities and ecosystems buffer and adapt to these changes.

Opening current roadless landscapes to additional roads and logging will reduce these natural watershed functions precisely when they are becoming more important due to our changing climate.

The Forest Service should ensure that the Final EIS fully evaluates:

- cumulative impacts of road construction and timber harvest on downstream water quality - particularly total suspended solids, dissolved oxygen, halides, and nitrogen and phosphorous;
- increased sedimentation and erosion associated with building roads and stream crossings;
- impacts to cold-water aquatic habitat, fish populations, and other aquatic species;
- changes in stream temperature and hydrology;
- impacts to headwater/upper watershed rivers, streams, and wetlands;
- fragmentation of wildlife habitat and ecological connectivity;
- spread of invasive species associated with new roads and increased vehicle access;

¹³ [New Outdoor Federal Data Released — Granite Outdoor Alliance](#)

¹⁴ [Vermont's Outdoor Recreation Economy Grows to \\$2.1 Billion in 2023 | Agency of Commerce and Community Development](#)

¹⁵ [The Connecticut River Watershed Partnership Act — Connecticut River Watershed Partnership](#)

- effects on drinking water sources;
- effects on flood resilience and downstream communities;
- implications for the outdoor recreation economy;
- impacts to climate resilience; and
- cumulative effects across the White Mountain and Green Mountain National Forests and the larger Connecticut River watershed.

The DEIS should have analyzed these impacts at the watershed scale, including downstream effects, rather than limiting its analysis to the National Forest's boundaries.

Conclusion

The Roadless Rule protects both intact forests as well as entire watersheds. Its value is not limited to the acreage designated as Inventoried Roadless Areas and its benefits extend through forests, headwater streams, tributaries, rivers, drinking-water supplies, wildlife habitat, biodiversity, downstream communities, and the economy.

The White Mountain and Green Mountain National Forests are particularly important examples. Their roadless forests help protect the headwaters and tributaries that sustain the Connecticut River, one of New England's most important rivers and a resource shared by communities across the four-state watershed.

With over 2.4 million people in the Connecticut River watershed¹⁶, the White and Green Mountain National Forests belong to the public. Community members, municipalities, Tribes, farmers, outdoor recreationists, conservation organizations, and downstream water users all have a legitimate interest in how these lands are managed.

Given the environmental and economic benefits that result from protected roadless areas, and the vulnerability of these areas to sedimentation, fragmentation, altered hydrology, and other impacts associated with rescission of the Roadless Rule, CRC strongly urges the U.S. Forest Service to:

1. Withdraw the proposal to rescind the 2001 Roadless Area Conservation Rule;
2. Select Action 1 - No Alternative in the draft Environmental Impact Statement and retain the existing Roadless Rule protections;
3. Fully recognize the downstream watershed benefits of Inventoried Roadless Areas; or, in the alternative
4. Fully and fairly evaluate cumulative impacts to water quality, aquatic habitat, biodiversity, wildlife connectivity, drinking water, recreation, and climate resilience at the watershed scale for inclusion in the final EIS.

Protecting roadless forests is an investment in healthy ecosystems and communities. For the Connecticut River watershed, the White Mountain and Green Mountain National Forests are not remote landscapes

¹⁶ [Connecticut River | American Rivers](#)

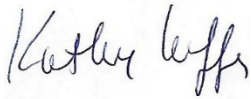
whose importance ends at their boundaries - they are part of the living system that sustains our rivers, wildlife, drinking water, economy, communities, and future generations.

CRC respectfully asks the USDA Forest Service to retain the 2001 Roadless Area Conservation Rule. Thank you for the opportunity to comment.

Sincerely,



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