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September 18, 2025

Mr. Brad Kinder, Acting Director
Ecosystem Management Coordination
U.S. Forest Service
201 14th Street S.W., Mailstop 1108
Washington, D.C. 20250-1124

Docket Number: FS-2025-0001

Dear Director Kinder:

Please accept these comments from the Society for the Protection of New Hampshire Forests (SPNHF) regarding the USDA's rulemaking on the management of inventoried roadless areas within the National Forest System. We are a non-profit land trust and forestry organization founded in 1901 whose mission is to perpetuate the forests of New Hampshire through their wise use and their complete reservation in places of special scenic beauty.

SPNHF opposed the implementation of the 2001 Roadless Rule. We argued at that time that a federal one size fits all policy directive should not override the planning process for specific national forests prescribed by the National Forest Management Act (NFMA), unless enacted by Congress. We still support that principle and believe that conducting an EIS to evaluate whether or not recession is appropriate.

We continue to support the balance of uses within national forests, specifically within the White Mountain National Forest. Our position has been that all WMNF lands are currently protected under the direction of the Forest Plan. We agree that some lands should be set aside as natural areas for future generations but there should also be areas where sustainable harvest is practiced. Each approach provides a set of different important ecological, social, economic values. Both can be provided within the WMNF.

We also believe that a determination of which existing roadless areas deserve further protection should be based on a detailed analysis of the biological, recreational, and economic values of each area, and not based solely on the fact that they are considered roadless under a U.S. Forest Service definition.

Given that the policy has now been in effect for nearly twenty-five years, it is appropriate for the Forest Service to proceed with an EIS in order to determine if incremental changes or a full rescission is needed. As you move forward with this review, SPNHF would ask you to consider the following points.

First, and most importantly, the overarching goal must be to sustain the health, diversity and resiliency of the national forests while continuing the commitment to balancing the multi-uses within these forests.

Second, we understand one of the main concerns behind the Forest Service proposal is to provide federal land managers greater ability to address the increased threats due to fire, insect and disease outbreaks and major storms. This is a legitimate concern. As some commenters have noted, the Forest Service could change the standard by which the agency can construct temporary roads when there is an imminent threat of a catastrophic event. For example, in roadless areas that are near the wildland urban interface.

Third, climate science conclusively shows that climate change is a significant factor in the increased frequency and intensity of wildfires. We would strongly urge the USDA to maintain a strong commitment to addressing climate changes through its existing programs. Doing so will help to lessen these intense wildfires.

Fourth, if the agency does move forward with the rescission of the current roadless rule, we would ask you to put in place other requirements to ensure important resources are not subject to forest fragmentation or unintended consequences.


Fifth, USDA must continue to follow the process called for in the National Environmental Policy Act. We would ask you to support the planning steps the Forest Service undertakes prior to conducting a timber harvest. We would especially urge the USDA to continue its commitment to facilitating a robust public input and engagement process. Both of those steps are strengths of the process.

Finally, the current management plan for the WMNF allows for a maximum annual harvest of up to 24 Million Board Feet. We would ask the Department to respect that figure as it is the result of the intensive stakeholder that led to the approval of the current WMNF Management Plan.

We acknowledge the issue of roadless areas in national forests is highly controversial. However, we would point out that timber harvesting is often used as a method of meeting other goals for management including the creation of wildlife habitats, maintenance of plant biodiversity, and promotion of recreational opportunities.

Therefore, regardless of the final decision the Department makes, the overarching goal must be to sustain the health, diversity and resilience of the national forests, like the White Mountain National Forest, while continuing the commitment to balancing the multiple uses within these forests.

Thank you for your consideration of these comments.



Jack Savage, President