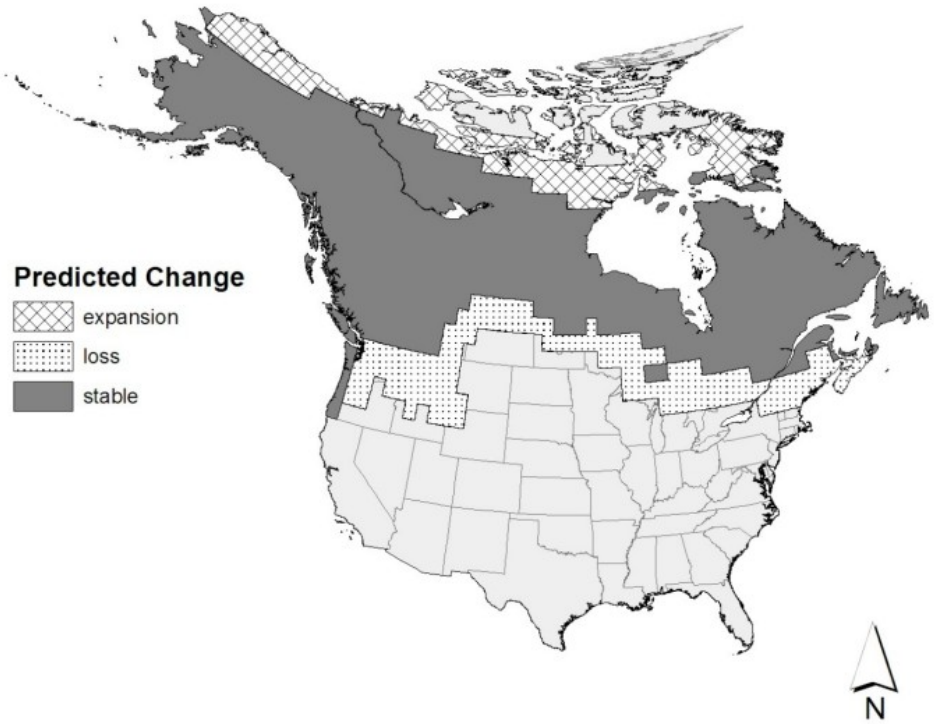
Comment #4: proposed Lake Tarleton Logging Project

WMNF/USFS reliance on outdated and industry-influenced data for the effects of logging on the carbon sequestration in the forest invalidates every environmental conclusion presented in the project reports.

As an example, and to reiterate, global warming will affect loons yet the project documents are silent on this.

https://scholarworks.umass.edu/cgi/viewcontent.cgi?article=1161&context=open_access_dissertations

Figure 1.6. Predicted change in available common loon breeding habitat based on criteria from classification of current loon range and historic average monthly air temperatures.



The project documents fail to address the sixth great extinction.

WMNF/USFS decisions in the Tarleton Logging Project are driven by political power rather than evidence-based:

https://www.americanbar.org/groups/environment_energy_resources/publications/fr/20210510-the-us-forest-services-expanding-use-of-condition-based-management/

The proposed Lake Tarleton Logging project documents fail to address the effects of noise on animals, including people:

"The majority of studies documented effects from noise, including altered vocal behaviour to mitigate masking, reduced abundance in noisy habitats, changes in vigilance and foraging behaviour, and impacts on individual fitness and the structure of ecological communities."

https://sites.warnercnr.colostate.edu/soundandlightecologyteam/wp-content/uploads/sites/146/2020/11/biologicalreviews2015.pdf

"In a study published this week in the Proceedings of the National Academy of Sciences, researchers found that adults and nestlings of three species showed multiple signs of chronic stress caused by noise pollution, including skewed stress hormone levels, possibly due to increased anxiety, distraction and hypervigilance."

https://www.floridamuseum.ufl.edu/science/noise-pollution-causes-stress-in-birds/

The proposed Lake Tarleton Logging documents failed to provide alternatives, including limiting actions to orchard and water supply restoration, outhouse/composting toilet construction, small field clearings around four or five of the former homesteads that have foundations, and reconstruction of the foundations and the construction of historically accurate structures (this would exclude the foundation with the huge ash trees in it) or designating the area as a Scenic Area.

Restored structures could be rented out as hiking or simple vacation cabins. The forest would be preserved while being made accessible in a less common and less expensive (than the AMC huts) way. These structures could also serve as housing for those interested in volunteering to work on Pre- and post contact archaeology. The apple trees that are not heritage varieties could be top-worked with historic scions.

The Tarleton Logging document failed to asses the cultural, social, cash, aesthetic and environmental value of the trees left standing, as compared to trees as saw-logs, incorporating of course the money and environmental costs of the logging.

The Tarleton Logging document failed to asses the social, cash and cultural value of the archaeological resources in a standing, mature, forest.

The Crawford Stewardship Logging Project has visual simulations:

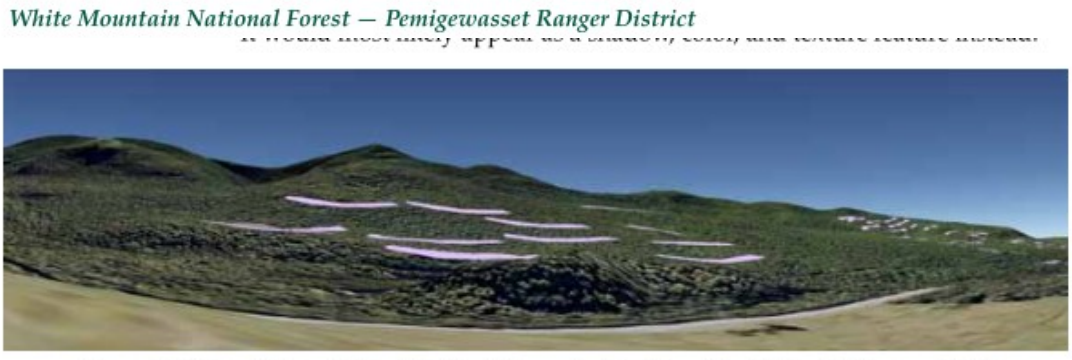


Figure 14. Visual Simulation Model – Viewpoint 7 – Crawford Path Parking – ALT 2

Are the views of those with enough money to stay at the Mt. Washington, or own it, more important than the views of the less powerful? Or was this visual study a feeler, to see if anyone made a fuss?

WMNF engaged in economic injustice in failing to provide a thorough visual and auditory impact assessment of the proposed Lake Tarleton Logging Project.

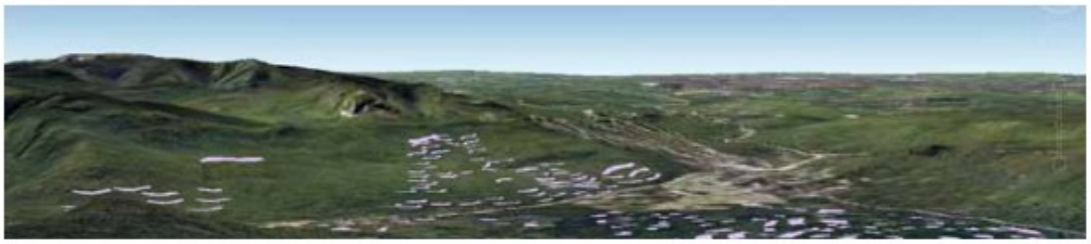


Figure 15. Visual Simulation Model – Compartment 48 – Mt. Eisenhower – Alt 2

Compartment 49

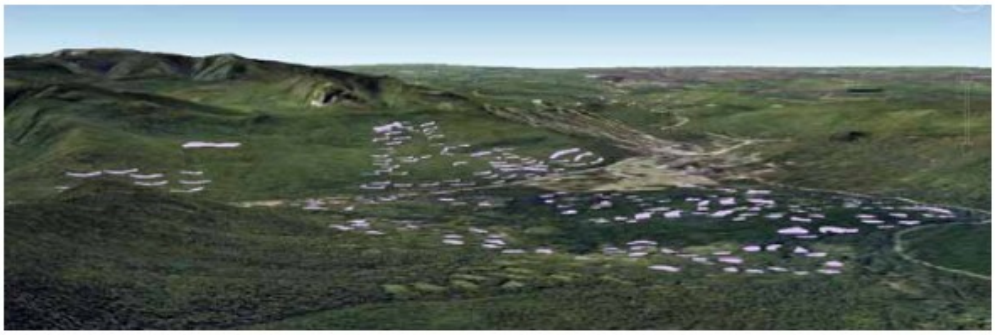


Figure 16. Visual Simulation Model – Compartment 49 – Mt. Eisenhower – Alt 2

Figure 17. Visual Simulation Model – Mt. Washington Hotel – Back – Alt 2

From the Crawford Logging Report: “Alternative 3 was developed to reduce the impacts of harvest treatment on scenic values. There are observers within the population living, working, or recreating in the area who prefer to view unbroken/unmanaged forested landscapes. Alternative 3 addresses this public issue by deleting the clearcut prescriptions (18 acres), eliminating 40 acres of patch cutting, and by reducing group selection openings by 39 acres.” (p. 54)

WMNF failed to address the needs of those who prefer unbroken/unmanaged forests, by developing any alternative logging plans for Lake Tarleton, that would reduce the visual impact from viewpoints and from the Charleston Road. Again, economic injustice.

Satellite View – A Sea of Clearcuts Near Mt Washington Hotel

http://www.maforests.org/WMNF.pdf

The Crawford Logging Report states: “Openings that pose a cumulative effect include 1990s clearcuts…” p. 58 (visible in the above photo.)

The Crawford Logging Report admits visual impact from 20 year old clear cuts but the Tarleton Logging document states: “Some visual impacts from the proposal can be expected, however these impacts would be most apparently immediately following timber harvest and would fade and blend over time as the forest regenerates.”

The visual assessment in the proposed Lake Tarleton Logging EA is inadequate because: Some visual impacts from the proposal can be expected and though they would fade and blend this will take fifty years to 120 years, especially because “recent warmer temperatures and precipitation variability may have stressed forests…” (p. 21, Forest Carbon Assessment)

The Crawford document is 180 pages, the Tarleton EA is 30 pages. Is that why the Tarleton EA does not contain this unsupported claim WMNF makes about the Crawford area trails?

Figure 1. Example of uniform vegetation occurring along trail sides (5/7/08).

Trailside Scenery

Management of the vegetation through timber harvesting along trails, roads, and from fixed points of interest could create opportunities to introduce variety and increase visual interest to the overall scenic landscape. Selection of the proper treatment can introduce scenic variety by providing visibility into what is presently dense forest cover. Through the careful placement of treatments such as a group, patch cut, or commercial thinning, previously hidden or unknown vistas can be opened and experienced. Properly coordinated treatments not only provide viewing opportunities of the lowland landscapes, either adjacent to or below the viewpoint, but also of hill and mountain range landscapes adjacent to or above the viewpoint. Management of the vegetation also provides the increased openness necessary for potential wildlife viewing. Cultural sites, previously disguised or unseen, may be exposed and experienced adding visual interest and scenic variety to the Project Area.

Opportunities to locate small areas of scenic interest can be found along the existing trails and bridges, below the mountain cabin, on the Mt. Clinton Road, and on the proposed Nancy Barton Trail reroute.

Harvesting treatments in the Project Area would improve the variety of visual and scenic opportunities available along the travel corridors and from the selected fixed locations.

WMNF provides no documentation that people prefer the type of trail vista shown to the right (Jericho Trail, Easton, 2022) to the one above.

WMNF provides no documentation that the logging abutting the Old Charleston Rd. will not damage the scenic quality of the road.

The Tarelton EA states a USFS policy of “treating infestations of non-native invasive species as necessary” yet it does not treat itself, an entity comprised of the most damaging invasive species in the history of the planet, so as to minimize its damage. To the contrary, it engages in every possible means of increasing its ability to do damage in order to profit and perpetuate itself. The 2005 Forest Plan is an example of this.

“That's the thing about bureaucracies: They hate to give up power or change, even when it's for their own good -- not to mention ours.”

https://www.hcn.org/issues/41.12/who-can-capture-the-forest-service

Since “stands on the WMNF are now mostly middle to older aged (Fig. 4).”(p. 21 Carbon document), the Tarleton Logging Project needs to be placed on hold while WMNF assesses our forests and maps the middle to older aged stands (this would include the Kinsman and Gordon Pond-Bog Pond areas) as directed by President Biden’s recent order, so it can leave them alone and formalize their protected state.

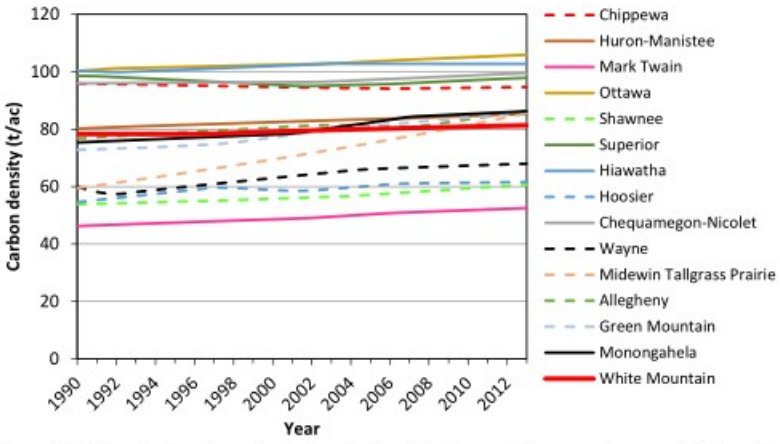


***Figure 4**. Estimated carbon stock density (metric tonnes C per acre) across National Forest units in the Eastern Region from 1990 to 2013.*

The Northern Chatham Logging documents include a 2018 eighteen page document on Climate Change, which has been replaced in later projects by a far more limited in scope, 2019, 26 page Carbon Document (in which CO2 shows up once, in the bibliography and ppm of CO2 doesn’t show up at all) which contains nothing as dire as this, from the former document:

“Inputs to these models concerning potential increases in CO2 and other greenhouse gases (as well as other forcing factors) are based on IPCC emission scenarios that provide internally consistent “storylines” about possible future social, economic, technological, and demographic developments. For the work cited below from the NESDIS 142-1 report, the modeled emission scenarios are the A2 scenario (GHG emissions steadily rising throughout the 21st century resulting in estimated CO2 concentrations above 800 ppm) and the B1 scenario (GHG emissions level off by mid-century and top out at approximately 500 ppm). Other scientific literature may also include the A1FI scenario which models a much higher CO2 level of 1370 ppm at the end of the century. The very latest work on climate modeling supporting the work of the IPCC (the Fifth Assessment) has changed from the scenario based approach to a new methodology (Wayne, 2015) which uses representation concentration pathways to provide various time-dependent projections of atmospheric greenhouse gas (GHG) concentrations. Given that this work has not been widely assimilated into the ecological scientific literature at this time, the scenario approach will be relied upon for future predictions of regional and project area climate unless otherwise noted below.” USFS Climate Change Report

The proposed Lake Tarleton Logging Project documents failed to incorporate this USFS data on increased precipitation in its assessment of the affects of logging on erosion, soil structure, the watershed and mercury concentrations:

“More recent work using the Climate Model Intercomparison Project 5 (CMIP5) modeling supports the previous work of Kunkle who used CMIP3 data. The authors of this study (Wuebbles, et al., 2014) note

that the CMIP5 modeling predicts, by the end of this century, a 50% increase in the annual fraction of precipitation falling in the heaviest events for the mid–low scenario (RCP4.5 approximately equivalent to B1), while a 90% increase is projected for the higher scenario (RCP8.5 approximately equivalent to AIF1). The authors also note that at the end of this century, under the RCP8.5 scenario, the current 20-yr event is projected to occur about 3 to 4 times more frequently for areas of the northeastern US. The National Weather Service estimated that the 24 hour event with a return interval of 25 years was between 5 and 6 inches for the project area (Hershfield, 1961). This projection would result in the 20 year storm becoming approximately the 5 year storm by 2100." USFS Climate Change Report p. 4)

"Modifying hydrologic and geomorphic regimes Hydrologic regimes associated with ESFEs contrast greatly with those characterizing closed forest cover. For example, transpiration and interception are dramatically reduced and recover only gradually as forest canopies redevelop."

https://www.fs.fed.us/pnw/pubs/journals/pnw_2010_swanson001.pdf

The proposed Lake Tarleton Logging Project documents failed to address the assertions in its Climate Change Report that "Other work suggests that as climate warms through the end of the century (2100), greenhouse gases will be released from soils, the availability of important nutrients will change, and the water quality in sensitive watersheds will decrease (Campbell, et al., 2009) even as net primary productivity is modeled to increase. The authors noted in their article that their model simulations and analysis have limitations, particularly of the feedback loops between processes operating in the environment. They were confident that their results indicated the direction and magnitude of change expected by the end of the century for the models and emission scenarios they used." (p. 5)

The proposed Lake Tarleton Logging Project documents failed to address regeneration issues caused by climate change: "One aspect of a changing climate is how warming temperatures and changes in precipitation may affect plant regeneration. Various studies point to the higher sensitivity of seedlings to climate change as they are likely more sensitive to extremes of temperature and drought than adult plants. Seedlings have shallower root systems and less access to deep soil water reserves and they also possess smaller non- structural carbon reserves that allow larger plants to cope with stress more effectively (Niinemets U. , 2010). Beyond just the gross variation in temperature and precipitation, there are other species specific complexities (germination phenology, seed maturation, seed persistence in soil) that will likely affect the ability of individual species to compete and thrive in a changing climate (Walck, 2011)." (USFS Climate Change Report p. 6)

The Lake Tarleton Proposed Logging Project data states: "The proposed action affects a relatively small amount of forest land and carbon on the White Mountain National Forest and, in the near-term, might contribute an extremely small quantity of greenhouse gas emissions relative to national and global emissions (Dugan and McKinley 2019)."

By this "logic" no action should be taken on climate change or greenhouse gasses by any single entity, even a third world country.

The proposed Tarleton Logging Project data failed to provide documentation showing that logging combined with climate change would not lead to unacceptable damages to heritage resources:

“Heritage resources are vulnerable in many of the same ways that natural resources are vulnerable, though the specific mechanisms that impact heritage resources are different. The environment is the greatest threat to fragile site materials such as wood and stone masonry. Water, wind, soil chemistry, floods, extreme temperatures, fluctuations in humidity, and freeze/thaw and wet/dry cycling are the primary threats to these resources. Predicted climatic changes include changes in the frequency, duration, and intensity of all of the above, and these changes, where they occur, will impact preservation (National Park Service, 2010). As a local example, higher flood flows at stream crossings have potential to compromise the structural integrity of historically significant stone masonry culverts. This issue was highlighted when several historical masonry culverts were at risk after Tropical Storm Irene passed over the White Mountain National Forest in 2011.” (USFS Climate Change Report p. 10)

The proposed Lake Tarleton Logging Project data failed to address the effects of the proposed logging on bird, insect, mammal, and amphibian species that may migrate north with climate change in the 100 years before the logged areas approach recovery:

“Changes in habitat suitability for many bird species of interest in the project area have also been modeled under a range of climate change scenarios. The mean centers of the suitable habitats for 147 species are projected to move, on average, between 98 and 203 km to the north-northeast by the end of the century, depending on the climate change scenario (Matthews, Iverson, Prasad, & Peters, 2011). A separate study that modeled projected change in suitable habitat under four climate change scenarios indicated the potential for relatively large changes in the bird community throughout the Northeast (Rodenhouse, et al., 2008) with the largest changes occurring under the higher emission scenarios (A1FI).” (USFS Climate Change Report p.10)

The proposed Lake Tarleton Proposed Project data is inadequate because:

It failed to incorporate the 2018 and 2022 IPCC reports.

It failed to address the ecological and historic resource damage that would be caused removing tree cover from the Old Charleston Road, combined with climate change (increased precipitation at increased intensity and increased flooding) use of the Old Charleston Road as a skidder road (complete removal of vegetative cover) and “upgrades” to the Old Charleston Road.

It assessed carbon production on a global scale but all other aspects of the project at a local scale.

It provided no support for the assertion that logging in winter will reduce environmental damage to an acceptable level.

It failed to provide a forest assessment showing the tree ages represented in each stand, and showing that no areas proposed for logging are mature or old growth forest.

It failed to provide data showing that removal of non-native conifers confers any ecological benefits.

The Lake Tarleton EA states a need for regeneration age forest habitat and that: “No regeneration-age (0-9 years old) forest habitat occurs except for one permanent wildlife opening actively managed by the

Forest Service and two smaller apple orchards not currently managed by the Forest Service. The Forest Service manages designated permanent wildlife openings to maintain valuable grassland and shrubland habitats." (pgs. 5-6) This is incorrect. The powerline corridor contains approximately 110 acres of land cleared on a 5-7 year rotation. This corridor is also supposed to contain wildlife crossing buffers, which would have older yet not mature trees. (see photo above, or previous page)

"Transmission line corridors in forested landscapes provide important early successional habitats for a taxonomically rich array of native plant and animal life, including populations of rare species."

https://newenglandcottontail.org/sites/default/files/research_documents/Wagner_et%20al_Powerlines.pdf

The proposed Lake Tarleton Logging Project data failed to show that early successional habitat created by logging is comparable to that created by natural disturbances in mature forest and failed to address its own data showing that clear cutting reduces natural, high-quality early-successional habitat:

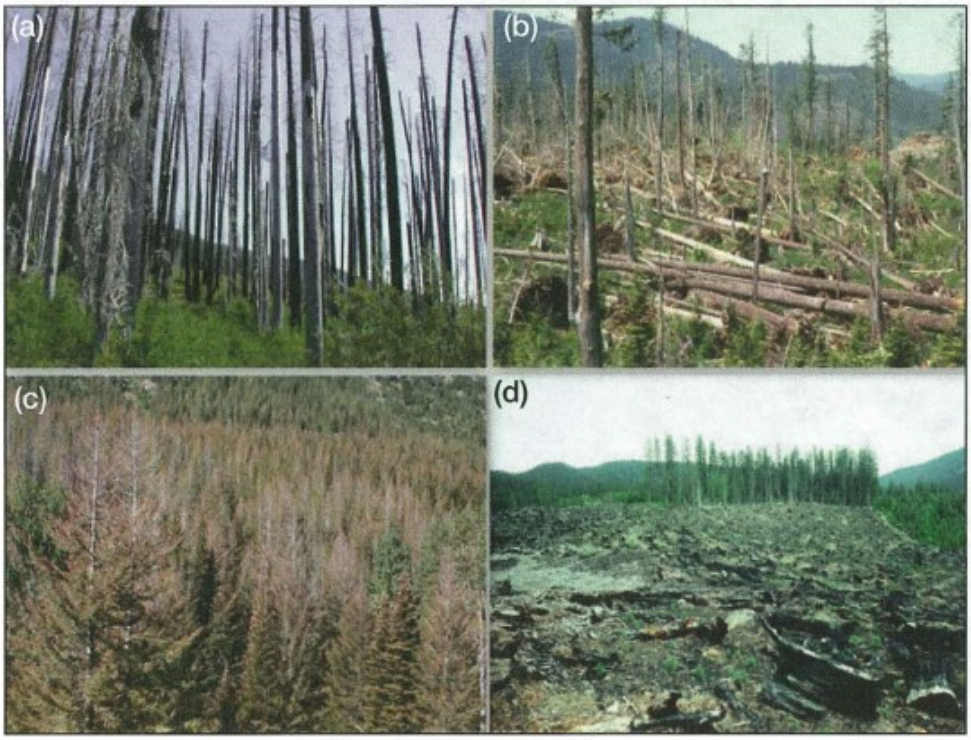


Figure 2. *Different types of disturbances produce different types of biological legacies, including living organisms and structures: (a) standing dead trees (snags) are dominant structural legacies after severe wildfires; (b) downed tree trunks and nearly intact understory communities are characteristic legacies after major windstorms; (c) standing dead trees are also dominant structural legacies after heavy insect infestations; and (d) clearcuts typically eliminate most aboveground structural legacies. Values for each metric are shown in Table 1 and are described in detail in the text.*

"Severe natural disturbances - such as wildfires, windstorms, and insect epidemics - are characteristic of many forest ecosystems and can produce a "stand-replacement" event, by killing all or most of the dominant trees therein (Figure 1). Typically, limited biomass is actually consumed or removed in such events, but many trees and other organisms experience mortality, leaving behind important biological legacies (structures inherited from the pre-disturbance ecosystem; Franklin et al. 2000), including standing dead trees and downed boles (tree trunks; Franklin et al. 2000). Such legacies provide diverse physical/biological properties and suitable microclimatic conditions for many species. Thereafter, species-diverse plant communities develop because substantial amounts of previously limited resources (light, moisture, and nutrients) become available. These emerging plant communities create additional habitat complexity and provide various energetic resources for terrestrial and aquatic organisms."

Table 1. Different types of intense disturbances generate different types of biological legacies

	Disturbance				
Biological legacies	*Wildfire*	*Wind*	*Insect*	*Volcano*	*Clearcut*
Live trees	Infrequent	Variable	Variable (depends on stand composition)	Infrequent – confined to margins	Infrequent or absent
Snags	Abundant	Variable	Abundant	Abundant (spatially variable)	Infrequent or absent
Downed woody debris	Variable, but typically abundant	Abundant	Variable, but eventually abundant	Abundant (spatially variable)	Infrequent
Undisturbed understory	Infrequent	Abundant	Abundant	Infrequent – confined to disturbance margins	Infrequent
Spatial heterogeneity of recovery	High	Variable	High	High	Variable – usually low
Time in early-successional condition	Variable	Variable	Long	Variable – usually long	Variable – usually short

“Traditional forestry activities (eg clearcutting or post-disturbance logging) reduce the species richness and key ecological processes associated with early-successional ecosystems; other activities, such as tree planting, can limit the duration (eg by plantation establishment) of this important successional stage.”

“Clearcutting has been proposed as a technique to create ESFEs, but this can provide only highly abridged and simplified ESFE conditions. First, traditional clearcuts leave few biological legacies (eg Lindenmayer and McCarthy 2002), limiting habitat and biodiversity potential. Second, clearcuts are often quickly and densely reforested, and often involve the use of herbicides to limit competition with desired tree species. Clearcuts can provide some early-successional functionality (eg serving as nurseries or post-breeding habitat for many bird species in the southern US; Faaborg 2002), but this service is often truncated by prompt reforestation.”

The 2005 WMNF Forest Plan admits the existence of early successional habitat in unmanaged forests:

“The forest will be a product of natural succession. Large- and small-scale change will occur through natural events, such as wind disturbance or ice storms.” (3-9)

“Historical disturbance regimes such as windthrow, fire and flooding have been altered or suppressed in eastern forests through human activity such as conversion of forests to younger aged stands more resistant to wind…”

https://www.fs.fed.us/nrs/pubs/jrnl/2014/nrs_king_2014_001.pdf

The proposed Lake Tarleton Logging Project data failed to provide data showing that the amount of clear cutting to provide early successional habitat is “in reasonable proportion to historical occurrences of different successional stages, as based on region-specific historical ecology.”

The 2005 WMNF Forest Plan defines its wildlife habitat improvements as unnatural, thus provides a definition for what are now undefined historic levels of disturbance/early successional habitat:

"Wildlife
S-1 Since habitat must be a result of natural process only, wildlife habitat improvement projects are prohibited." (3-17)

"Wildlife
S-1 Creation of regeneration forest habitat must occur only through natural disturbance events…" (3-53)

The proposed Lake Tarleton Logging Project data failed to prove that trees that are suppressed or "poor quality" do not possess ecological values that require they should be left standing.

"Trees targeted for retention would include mature white pine, windfirm trees, and other trees exhibiting good quality and health. Conversely, the trees targeted for removal would primarily be suppressed and/or poor-quality trees. Due to the emphasis of trees targeted for retention and removal, this treatment would result in an overall increase in tree quality." (Tarleton EA p. 10)

The Lake Tarleton Logging Report failed to address the data showing that "Amphibians are also expected to be increasingly vulnerable to climate change. Researchers (Rodenhouse, Chritenson, Parry, & Green, 2009) postulate that vernal pools, a key breeding habitat, may be present for shorter periods of time due to reductions in snow pack, shifts in the timing of precipitation, and increased evaporation from higher temperatures. The shortening of the pool hydroperiod would likely negatively affect population dynamics by increasing competition, decreasing size at metamorphosis, and stranding pre-metamorphic larvae. Insects are expected to change geographic distribution and exhibit altered phenology, physiology, and life history in response to climate change.

Aquatic habitats are vulnerable from changes in both temperature and precipitation. Some of the vulnerabilities are due to an expected increase in the intensity and frequency of flooding events which will cause habitat damage and direct mortality to aquatic species, in particular freshwater mussels. This impact would be disproportionately larger in developed watersheds where human infrastructure (dams and culverts) exacerbates flood damage and limits recolonization. Higher temperatures are expected to cause the distribution of species dependent on cold water to shift north and to higher elevations while warm water species colonize streams that are no longer cold enough to support species like brook trout.· Groundwater resources that may support cold water streams will be stressed by an increase in evapotranspiration due to climate change. In larger cold water streams this increase, in combination with water withdrawal for human consumption, may lower summer base flows in some watersheds, causing many perennial streams to become intermittent (New Hampshire Fish & Game Department, 2015). (USFS Climate Change Reports pgs 8-9)

https://www.nps.gov/articles/000/water-loss-compounds-amphibians-vulnerability-to-climate-change.htm#:~:text=Previous%20research%20has%20also%20found,amphibians%20than%20earlier%20research%20anticipated.

https://www.fs.usda.gov/ccrc/topics/amphibians-and-climate-change

The 2005 WMNF Forest Plan is invalidated by climate change, especially feedback cycles which are increasing the rate of climate change.

The 2005 WMNF Forest Plan states:

Purpose: “Provide high quality sawtimber and other timber products on a sustained yield basis.” (3.3)

The proposed Lake Tarleton Logging Project fails to fulfill the sustained yield goal, which requires leaving all trees standing, to sequester carbon, to slow climate change and create the highest chance of enabling the forest to perhaps, in the future, “provide high quality sawtimber and other timber projects.” (3.3)

The proposed Lake Tarleton Project documents fail to give the proportion of young to mature forest that is the “desired” condition and thus proof that this proportion is “sustainable.”

The Lake Tarleton Logging Project documents fail to provide proof of inadequate early successional habitat, by any legitimate historic measure, thus fails to provide proof of need to create this by logging.

“...the proportion of early-successional habitat in northern industrial forests is currently several times that which occurred in presettlement times (Lorimer and White, 2003).”

https://www.fs.fed.us/ne/newtown_square/publications/other_publishers/OCR/ne_2003_degraaf001.pdf

https://www.nationalgeographic.com/environment/article/is-clear-cutting-us-forests-good-for-wildlife

“Timberspeak” – Logging Spin and Propaganda

"There is no conservation reason for creating more early successional habitat. There is much more of it nowadays than there ever was in pre-Colonial times. It's a bogus argument, ginned up as an excuse for more logging. But their argument could work with a gullible public.”

John Terborgh, Worldwide Leading Conservation Biologist

"What is the recipe for getting people to accept unsightly practices like clear-cutting? Give them plausible sounding reasons: tell them that the forest is unhealthy, that red maple is taking over, that alien species are invading, that trees will fall on people, that there is an unacceptably high fire danger, that a hurricane will blow everything down. Sound familiar? Presumably, clear-cutting is needed to help avert such impending catastrophes. But if people aren't buying, what then? Push the "early successional habitat" argument. Win support from a naive public by insisting that we need more cottontails and game bird species, suggestive of a mid-1800s landscape. Have I missed any of the arguments? By the way, I've been told in private by foresters that these are the standard talking points that State and Federal forest agencies routinely use to soften up the public prior to an unpopular action."

Robert Leverett, Forest Ecologist & Executive Director Eastern Native Tree Society

“Clearcutting and other even aged silvicultural practices and timber road construction have caused widespread forest ecosystem fragmentation and degradation. The result is species extinction, soil erosion, flooding, destabilizing climate change, the loss of ecological processes, declining water

quality, diminishing commercial and sport fisheries. There is no better way to save biodiversity than by preserving habitat, and no better habitat, species for species, than wilderness."

Edward O. Wilson, Worldwide Leading Conservation Biologist

"Forest Bill is About Commerce, Not Science: The arguments presented in support of a bill that would allow commercial timber harvest on State lands are illogical. The argument that we need to mimic the natural disturbances of fires, storms, insects, and diseases to prevent the "severe imbalances" of fires, storms, insects, and diseases is wholly illogical. We need to replicate insect outbreaks so that we don't have insect outbreaks? How does this make sense? We cannot let this bill masquerade as ecological restoration legislation when, at its core, it is a bill to allow revenue generation via logging of public trust resources."

Amy S. Karpati, Pinelands Preservation Alliance & 12 NJ Scientists

"Anyone can identify destructive forest practices. You don't have to be a professional forester to recognize bad forestry any more than you need to be a doctor to recognize ill health. If logging looks bad, it is bad. If a forest appears to be mismanaged, it is mismanaged."

Gordon Robinson, Chief Forester Southern Pacific Land Company"

http://www.maforests.org/Timberspeak.pdf (references for quotations above incorporated by reference)

The Lake Tarleton Logging Project documents fail to show protection of Threatened Species.

2005 Plan states: "TES species and Outstanding Natural Communities will be conserved. Habitat at the landscape level will include a sustainable mix of young and mature forest." (3.3)

TES species is not defined nor are they listed in this document. TES Species does not come up in a word search in the Lake Tarleton Biological Evaluation.

Online, is this definition: "The Threatened, Endangered & Sensitive (TES) Species Program is the Forest Service's dedicated initiative to conserve and recover plant and animal species that need special management attention and to restore National Forest and Grassland ecosystems and habitats."

https://www.google.com/search?q=TES+species+usfs&rlz=1C1GCEA_enUS885US886&oq=TES+species+usfs&aqs=chrome..69i57j33i160l2.4060j0j7&sourceid=chrome&ie=UTF-8

The only mention of 'threatened" in the Lake Tarleton EA is:

"9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973. All federally listed species with potential to occur in the affected area were evaluated in the Biological Evaluation. Proposed project activities may affect northern long-eared bats; however, there are no effects beyond those previously disclosed in the Service's programmatic biological opinion for the final 4(d) rule dated January 5, 2016. Proposed project activities are in compliance with the Endangered Species Act."

The Lake Tarleton Logging Project documents fail to show that clearcutting and shelterwood cutting accomplish rather than undermine, its goals of increasing species diversity and forest health:

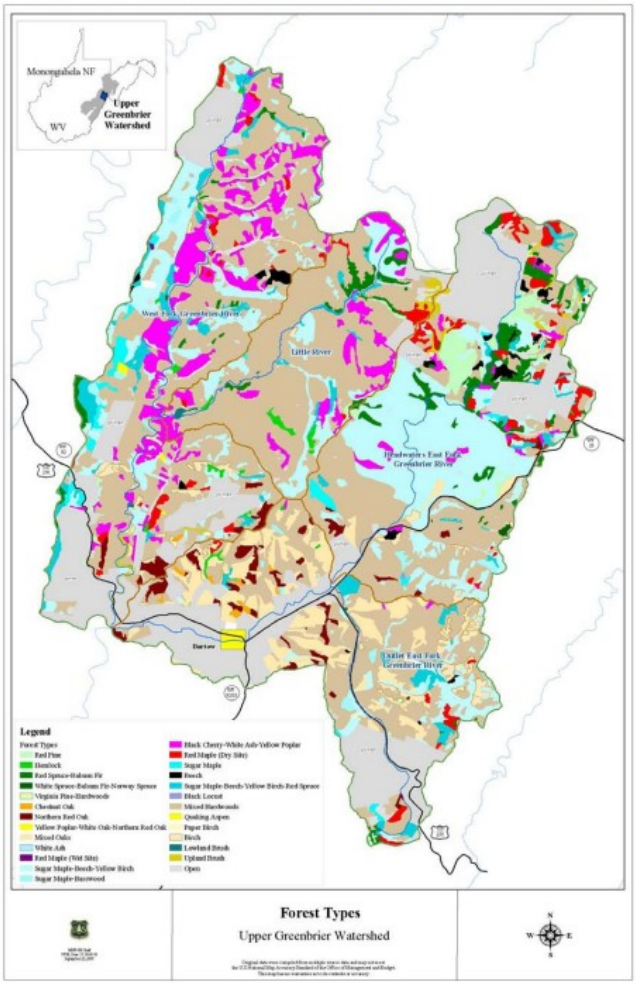
"600 leading biologists, ecologists, foresters, and scientists including E.O. Wilson wrote to Congress stating: "Clearcutting and other even aged silvicultural practices and timber road construction have caused widespread forest ecosystem fragmentation and degradation. The result is species extinction, soil erosion, flooding, destabilizing climate change, the loss of ecological processes, declining water quality, diminishing commercial and sport fisheries…… Even-age logging includes the application of clearcutting, high grading, seed-tree cutting, shelterwood cutting, or any other logging method in a manner inconsistent with selection management."

http://www.maforests.org/Timberspeak.pdf

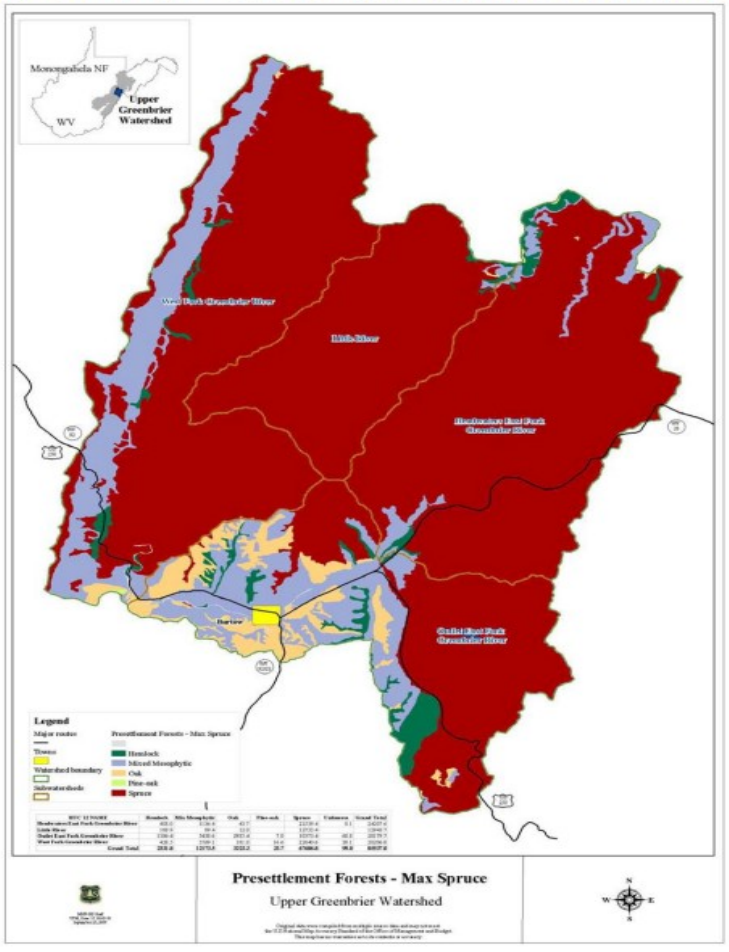
https://shawneehollers.wordpress.com/2014/09/17/regulatory-capture-collusion-is-suicide/

The proposed Lake Tarleton Logging project documents failed to provide maps of post-contact settlement and present conditions (including general stand ages) for the proposed Lake Tarleton Logging Project to provide a meaningful baseline for historic levels of early successional habitat and natural species:

Map VG-2. Current Forest Types in the Upper Greenbrier Watershed



Map VG-1. Estimated Presettlement Forests in the Upper Greenbrier Watershed



https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsm9_011056.pdf

“Management plans should provide for the maintenance of areas of naturally developing ESFEs as part of a diverse landscape. This should be in reasonable proportion to historical occurrences of different successional stages, as based on region-specific historical ecology.”

https://www.fs.fed.us/pnw/pubs/journals/pnw_2010_swanson001.pdf

WMNF public outreach for notification of logging projects in inadequate. (See the numbers of comments and objections to WMNF logging projects.)

Public input has had no substantive effect on WMNF plans, and is a pretense at fulfilling requirements for input. (see public comments and lack of substantial changes in logging plans.)

Only a lawsuit against WMNF/USFS is effective in stopping or altering WMNF/USFS logging plans.

This is economic injustice, as well as indicative of regulatory capture of WMNF/USFS.

This document could go on to deconstruct every statement in every document produced by WMNF to justify its management of WMNF and the Lake Tarleton Logging “proposal” (more of an edict, really.)

WMNF should consider that when legal and possible means of curtailing environmentally destructive Federal (and state) government projects are unavailable to the vast majority of people affected by these projects, a tipping point may be reached where mass civil disobedience occurs. Climate change will likely speed our movement to this tipping point.

As with slavery, women’s suffrage, systemic racism, regulatory capture, political campaign contributions defined as “free speech”, and corporate personhood, social and cultural battles happen when what is unethical, exploitative and harmful (to people, other animals, plants, trees, fungi, bacteria, the whole ecosystem) is defined as legal by those in power.

WMNF is engaging in illegal practices on the assumption that they will not be challenged in court.

WMNF is engaging in perhaps legal but unethical and harmful logging, herbicide use, fire retardant use and other management activities on the assumption that they will not be challenged in court.

With the climate emergency and the sixth great extinction, there is no justification for these actions, on an agency or personal level. The 2005 Forest Plan has no legitimacy in the context of our environmental and cultural situation.

WMNF waves pieces of paper as though they will not only justify its actions, but protect it from the effects of ecological and cultural collapse.

“**About PEER**

PEER supports current and former public employees who seek a higher standard of environmental ethics and scientific integrity within their agencies. We do this by defending whistleblowers, shining the light on improper or illegal government actions, working to improve laws and regulations, and supporting the work of other organizations.
All our services are provided pro bono, without charge. Through PEER, public servants can choose to work as “anonymous activists” so that public agencies must confront the message, rather than the messenger.”

https://peer.org/about-us/

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