

I object to the Forest Service's Draft Decision

USFS failed to update its carbon assessment:

USFS: "As for your question about more recent data there is some exciting news to report on that front, the Forest Service has made the investment and new data up to 2020 will be available in the coming months. We do intend to update the WMNF carbon assessment once that data is in hand. Forest carbon dynamics play out over decades and centuries so it doesn't make sense to report figures on an annual time frame. Currently the 5-10 year reporting cycle is considered appropriate."

The 2005 Forest Plan is out of date and illegitimate. The Proposed Tarleton Logging Project fails to meet the 2005 Forest Plan goals.

"2005 Forest Plan Goals

We will manage to sustain a healthy forest and use the latest scientific knowledge to restore the land and forest where needed. Rather than focus on individual species, we will manage for ecosystem viability within the context of New England."

Project fails to "manage for ecosystem viability" by failing to allow the restoration of old growth forest, which is an endangered habitat and also needed for species protection and interconnectivity.

Project fails to use the latest scientific knowledge re. healthy forests and restoration and global warming, data which was submitted to FS by the public.

'2005 Air Quality; Goals

Forest ecosystems are not adversely affected by air pollution, and Forest management activities are conducted to protect or maintain air quality."

Project plan fails to protect forest ecosystems from air pollution (CO2.)

2005: "Conservation Education; Goals

The White Mountain National Forest will continue to work internally and externally with partners and volunteers to connect people to the land by providing the public with the tools, experiences, training, and information they need to understand, appreciate, and enjoy their National Forest, and to participate effectively in sustaining natural and cultural resources.'

Project fails to promote conservation education goals, because it uses outdated data, discourages connection to WMNF land by failing to produce an EIS which would

necessitate USDA response to public input. It fails by using logging practices which damage and degrade the forest, thus precluding understanding, appreciation and enjoyment of the Forest. It discourages public efforts to sustain natural and cultural resources, because the process of public understanding is thwarted by poor quality data used by USFS and the necessity to sue USFS to bring about real change in proposed project. Effective public participation is actively discouraged by the many hours of work required by any member of the public who comments on a project, and the routine, relentless and effectively complete dismissal of public comments and objections.

“2005: TES Species — General Goals

The White Mountain National Forest will provide sufficient habitat and protection to preclude the need for species listing under the Federal Endangered Species Act due to National Forest habitat conditions or effects of activities.

For species currently listed under the Federal Endangered Species Act or designated Regional Forester’s sensitive species, the Forest Service will contribute to conservation and recovery of species and their habitats.”

The Proposed Tarleton Logging Project fails to meet requirement to “contribute to conservation and recovery” of the Long-Eared Bats and their habitat.

Draft Decision: “An updated biological opinion is anticipated from USFWS by March 31, 2023. The current determination for this project is ‘may affect but not likely to adversely affect’. This determination is based on tree removal occurring strictly in winter when bats will not be on the landscape, and therefore there will be no direct effects to the northern long-eared bat. Should USFWS provide reasonable and prudent measures or terms and conditions from the re-initiated consultation, they will be incorporated into the final decision.”

Project documents fail to explain what “may affect but not likely to adversely affect” means, as applied to the Long-Eared Bat. Any effect that is not positive is likely to be negative, given the Bat’s precarious state. The only positive effect the FS could have would be brought about by not logging, sparing the bats and their habitat from damage.

“Habitat loss is a general threat to all bats that use trees to roost. Intact forest habitat is particularly important to the Northern long-eared bat for roosting, and the loss of that habitat means loss of good roost spots for maternity colonies and nonreproductive individuals. The loss of habitat can happen through clearing for development and agriculture...” and logging.

https://portal.ct.gov/-/media/DEEP/wildlife/pdf_files/outreach/fact_sheets/NorthernLong-earedBat.pdf

“Summer habitat loss: Highway construction, commercial development, surface mining and wind facility construction permanently remove habitat and are activities prevalent in many areas of this bat’s range. **Summer habitat loss may result in longer flights between suitable roosting and foraging habitat, fragmentation of maternity colonies and direct injury or mortality...**

- **Climate change:** Changes in temperature and precipitation may influence the species’ available suitable roosting and foraging habitat and prey availability.’

<https://www.fws.gov/species/northern-long-eared-bat-myotis-septentrionalis>

The Draft Decision failed to address the effects of climate change on the Long-Eared Bat, or anything else.

The Draft Decision measures the project’s effect on increasing global warming at a global level, and dismisses it, but measures the projects claimed benefits to the local economy and certain wildlife species at a local level, and uses them as justification for the project. FS has to use the same standards of assessment for all aspects of the proposed logging project.

2005: Management Plan; Goals

Maintain habitat opportunities for wolf colonization on the Forest.”

Project fails to meet this criteria.

“Terrestrial Habitat Management Reference Document

Introduction

The Wildlife Standards and Guidelines in Chapter 2 of the revised 2005 White Mountain National Forest (WMNF) Land and Resource Management Plan (Forest Plan) include a guideline (G-1, p. 2-33) that says, “Habitat should be managed according to guidance provided in the Forest’s Terrestrial Habitat Management reference document.”

The Terrestrial Habitat Management states:

“Some examples of wildlife species that use non-forested terrestrial habitats include eastern smooth green snake, American woodcock, brown thrasher, mourning warbler, indigo bunting, masked shrew, snowshoe hare, meadow vole, black bear, ermine, and moose.

There has been a significant decline in non-forested upland openings across the New England landscape in the past one hundred years (DeGraaf 1991). ..

Depending on size, permanent wildlife openings may be components of the overall forest composition or provide a separate habitat for a specialized wildlife community. To the extent possible, they will be placed across the landscape. **In most instances, the Forest**

will not manage for large grassy areas such as grasslands, pastures, or savannas that would provide for grassland species such as eastern meadowlarks and bobolinks. **These habitats would not have occurred naturally in the mountains of the Forest, so they will not be created.”**

Non-forested upland openings “would not have occurred naturally in the mountains of the Forest,” so like “large grassy areas” they should not be created in the White Mountain National Forest.

Black bears are at population level that have led NH Fish and Game to encourage the killing of female bear with cubs, including cubs not likely to survive without their mothers, which indicates that the Forest Service has done too much clear-cutting in WMNF.

Draft Decision Notice: “The proposed action will have minimal impact on the environment and will benefit multiple resources.”

If the logging will have “minimal impact on the environment”, then the claimed environmental benefits don’t justify the logging. Does FS mean “minimal negative impacts on the environment”, in which case where is the documentation, and what are the multiple “resources” it claims will benefit? To leave this undefined makes the justification worthless. FS once again appears to be using a global measure for reducing claimed environmental impact and the local measure for claiming benefit.

Draft Decision inflates claims of “adjustments” to the “final proposed project,” by including in its list changes that exist only in the documents.

Draft Decision states “The decision I am making in this document tiers to management decisions made over 30 years ago.” What “management decisions” does this refer to? The out-of-date, illegitimate 2005 Management Plan was made 18 years ago.

None of the errors I pointed out in my submissions were remedied or addressed in the Draft Decision.

None of the higher quality and/or more recent studies I submitted were incorporated in to the Draft Decision.

I send again my submissions, since the problems with your Environmental Assessment listed in them have not been addressed in the Draft Decision.

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