Lake Tarleton IRP – May 1, 2023

[1] In my comment letter Data Submitted (UTC 11): 5/12/2022 12:56:38 AM

Subject I Addressed: Forest Plan Amendment, Bats

The Forest Service Draft Comment Response:

The purpose and need of the Tarleton IRP is to move towards the land management goals and objectives laid out in the WMNF forest plan. The vegetation management proposal will "use sustainable ecosystem management practices to provide a diversity of habitats across the Forest, including various habitat types, age classes, and non-forested habitats" (Forest Plan, p. 1-20) (EA pg. 5). Removing the vegetation management part of the Tarleton IRP does not meet the purpose and need for the project to meet the habitat management objectives laid out in the WMNF forest plan. [ID#1]

My Solution:

You keep referring to your antiquated forest management practices that you are admittedly in the process of revising. Put the Tarleton IRP on hold, update your Forest Management procedures, then reinitiate the project from scratch with full public opinion? The world and its environs have changed significantly and rapidly since 2005 and the years leading up to your 2005 decision. The Biden Administration has recently told you to preserve old forests (see [6] below]. The Northern-long Eared Bat (NLEB) has been placed on the endangered list this year. Our FOIA request for a stand-age chart of trees is almost incomprehensible which indicates that you don’t really know. You need to provide a map indicating age stands to give the public a better understanding. You say you know there are bats in the Project area but you don’t think you will significantly impact them. You need to do a better assessment of this.

[2] In my comment letter Data Submitted (UTC 11): 5/12/2022 12:56:38 AM

Subject I Addressed: Revise MA to 8.5 Scenic Area

Forest Service Draft Comment Response:

Revising the management area around Lake Tarleton is beyond the scope of the Tarleton IRP. Management areas are assigned based on management areas of adjacent forest service land and the historical use of the area. Re-designating an MA requires a forest plan amendment, the forest plan is not scheduled to be revised for the near future. A change or addition to an MA during a plan revision would be analyzed and considered during that analysis. [ID#2]

My Solution:

As stated above, put this plan on hold until you revise your forest plan amendment that is in dire need of revision, and then re-analyze. Give this ‘Scenic area’ designation a chance. Overwhelming responses to the 2nd comment period asked for this designation. Your response essentially dismisses all of them by saying – “No response required: ‘**Concern: [Seq#7]** People's personal attachment stories to the Lake Tarleton area. [ID#7] **Response: [Seq#7]** No response required [ID#7]”

[3] In my comment letter Data Submitted (UTC 11): 5/12/2022 12:56:38 AM

Subject I Addressed: Alternative to proposed action

Forest Service Draft Comment Response:

Commenters do not propose an alternative to the proposed action or provide any specific deficiencies with the existing analysis in the EA and project record. No further response required as commenters do not provide substantive, actionable issues related to the project. Comments are general in nature. [ID#13]

My Solution:

Same as above. No Action at Tarleton. If you will not accept that alternative, then a thorough Environmental Assessment (EIA) must be performed. The risk of jeopardizing a clean, unspoiled high mountain lake in the WMNF deserves and requires further analysis.

[4] In my comment letter Data Submitted (UTC 11): 5/11/2022 10:58:20 PM

Subject I Addressed: Wildlife habitat off-forest

The commenters reference wildlife habitat off-Forest. However, the scope of this proposal concerns wildlife habitat management consistent with the forest plan and within the Tarleton HMU objectives. Further, open areas located on private lands are not necessarily managed as wildlife habitat and are not subject to Forest Service control. The Forest Service manages wildlife openings for the sole purpose of providing this habitat to the species that utilize it. Great care is taken to minimize negative impacts to wildlife in the maintenance of these areas.

My Solution:

Theoretically, if there were a million acres of private wildlife management opening surrounding a USFS managed forest, you would log to create a wildlife management because that’s your directive? This is an extreme comparison to prove my point. If your goal is truly to create a wildlife management early successional opening, then you already have it: “We (Peter and Elaine) computed the area that the powerline that abuts the 2022 DEA area and with an average width of at least 320 feet, the powerline offers about 180 acres of early successional forest.” Not to mention that that section of the powerline is probably the worst tick infested area in Grafton County and those ticks will invade whatever openings you create and bring them closer to the shores of Lake Tarleton, affecting wildlife and humans alike.

[5] In my comment letter Data Submitted (UTC 11): 5/11/2022 10:58:20 PM

Subject I Addressed: Our request for current independent studies regarding silvicultural clearcutting

Forest Service Draft Comment Response:

The application and effects of silvicultural clearcutting are described on page 10 of the Environmental Assessment (EA). Clearcutting is needed to achieve the goals of increasing age-class diversity and maintaining or increasing aspen/birch habitat to improve wildlife habitat diversity within the Tarleton HMU. Clearcutting is a current and effective silvicultural treatment used to manipulate the light environment to better suit shade intolerant and mid-tolerant species. Safford 1983 and Perala 1977 concluded that paper birch and aspen species require large openings and full sunlight for successful regeneration. Yamasaki et al. 2014 discusses that clearcutting results in true early successional vegetation that produces larger compositions of paper birch, aspen, white ash, yellow birch etc. whereas shade tolerant species, such as beech and striped maple, increase with additional shade. [ID#21]

My Solution: Provide current independent studies. What you quoted above are not independent studies and not current.

Safford 1983, Silvicultural Guide for Paper Birch in the Northeast, is a U.S. Department of Agriculture, Forest Service, Northeastern Forest Experimental Station publication.

Perala 1977 is a Manager's handbook for aspen in the north-central states and is a USDA FS publication

Yamasaki et al. 2014, has the following ‘Quality Assurance’ disclaimer: (This publication conforms to the Northern Research Station’s Quality Assurance Implementation Plan which requires technical and policy review for all scientific publications produced or funded by the Station. The process included a blind technical review by at least two reviewers, who were selected by the Assistant Director for Research and unknown to the author. This review policy promotes the Forest Service guiding principles of using the best scientific knowledge, striving for quality and excellence, maintaining high ethical and professional standards, and being responsible and accountable for what we do.) This essentially means it is not a true independent study.

[6] In my comment letter Data Submitted (UTC 11): 5/12/2022 12:56:38 AM

Subject I Addressed: Regarding Biden’s administrative executive order regarding our nation’s forests.

Forest Service Draft Comment Response:

Presidential executive orders pertaining to national forests are managed by the Secretary and are beyond the scope of the Tarleton IRP. Any goals and objectives pertaining to the executive order will be directed by the Chief and addressed at a later date. [ID#24]

My Solution:

The Secretary of Agriculture answers to President and furthermore answers to any Presidential and/or laws passed by congress. Forest Service’s response is an incomprehensible answer. Solution - resolve this now and not later by completing an EIS addressing the mandates of **EO 14072** (Federal lands be managed “to promote their continued health and resilience; retain and enhance carbon storage; conserve biodiversity; mitigate the risk of wildfires; enhance climate resilience; enable subsistence and cultural uses; provide outdoor recreational opportunities; and promote sustainable local economic development” and **EO 14008** (“Federal Government must drive assessment, disclosure, and mitigation of climate pollution and climate-related risks in every sector of our economy, marshaling the creativity, courage, and capital necessary to make our Nation resilient in the face of this threat.”

[7] In my comment letter Data Submitted (UTC 11): 5/12/2022 12:56:38 AM

Subject I Addressed: The 2005 WMNF Forest Plan is out of date and should be revised before any new timber projects are planned. [ID#28]

Forest Service Draft Comment Response:

The current analysis is consistent with Forest Plan direction. Forest plan revision is out of scope for the current proposal. [ID#28]

My Solution:

Put the plan on hold, revise your 18-year-old Forest Plan to reflect current environmental issues, do an EIA like you should have from Day 1, include viable alternatives, then ask for public comment.

[8] In my comment letter Data Submitted (UTC 11): 5/12/2022 12:56:38 AM

Subject I Addressed: Lake and stream water quality due to runoff, sedimentation, and potential herbicide contamination

Forest Service Draft Comment Response:

Herbicides: When herbicide applications are warranted, the WMNF uses spot foliar application methods or cut-stump applications according to the required herbicide label directions. The applications are very targeted to individuals of the targeted invasive species, and involve very limited amounts of herbicides (since the infestation sizes of invasive species on the WMNF are very small). We follow all applicable federal and state laws and regulations regarding application of herbicides, including required setbacks from public water supplies and surface waters. The form of herbicide used whenever we are in the vicinity of water or wetlands is formulated to be immobile; that is, it will not readily leach offsite and into aquatic systems, and quickly biodegrades on-site.

Sedimentation: Water quality concerns in Lake Tarleton will be limited by following applicable State and National Core BMPs as well as Forest Plan Standards and Guidelines (EA, pgs. 16-17), which are aimed at minimizing erosion and sedimentation resulting from vegetation management activities. Harvest is scheduled to be conducted in winter strictly during frozen ground conditions which will further minimize erosion and sedimentation. Phosphorus entering Lake Tarleton is the biggest concern, as it would cause algae blooms and a reduction in water clarity. Phosphorus is primarily transported by sediment, so by limiting erosion and sedimentation, we would also be limiting phosphorus additions to Lake Tarleton. In addition, studies in the White Mountains have shown that water quality changes are not measurable at harvest levels below about 20% of the basal area of a watershed. This project would remove 6.1% of the basal area in the Lake Tarleton watershed.

My Solution:

Herbicides: We request the forest service (FS) provide the specific herbicide(s) they have and might use. Their statement that the, “form of herbicide used whenever we are in the vicinity of water or wetlands is formulated to be immobile; that is, it will not readily leach offsite and into aquatic systems, and quickly biodegrades on-site”, is perfunctory at best and does not comport with scientific controversy on many herbicides, their mobility in biological systems, biodegradation rates, and general bio-safety. The FS should name the herbicides they intend to use, cite scientific widely accepted scientific peer-reviewed evidence that they are immobile, do not readily leach offsite, and quickly biodegrade on-site. We also suggest the FS NOT use herbicides in the Lake Tarleton watershed and use only manual removal of invasive that they instigated by their logging activities. The notion that herbicides would be “immobile” in a watershed that is exceptionally wet and populated by numerous streams, defies basic chemistry, logic, and current knowledge of riparian areas. Any hydrophobic or hydrophilic substance will be mobile in water if the water is running quickly. The use of herbicides undermines the notion that biodiversity is of interest to the Forest Service since nearly any herbicide they would use, by its nature and definition, kills most any plant, and plants are the primary producers of the entire food web making up ~82 percent of all the biomass on Earth.

Sedimentation: Your Forest Plan Standards and Guidelines are old and do not account for the climate crisis we are in. Last year was one of the wettest winters on record for the northeast. The watershed above Lake Tarleton was tremendously loaded. Although you will be logging during the winter, as soon as the ground thaws sedimentation and runoff will commence. The lake itself has many shallow areas below your prescription zones that are vulnerable to this increased runoff and algal blooms.

[9] In an email I sent to Pemigewasset Forest Service, Oct. 12, 2021

Subject: “Can you please provide online access to a topographical map of the proposed area of timber harvest regarding the Lake Tarleton Project or a place where I might go and retain such a map?”

Forest Service Response: An additional map was provided.

My Solution.

The map provided was marginal at best and the same for the map provided in the 2023 Final EA. FS needs to provide a map with topographical contour lines and elevation markers in the proposed logging areas above Lake Tarleton eastern shore that will indicate to the public that this is taking place on a steeply sloped watershed down to a mountain lake. The Powerlines are at about 1600 feet elevation and the lake is at about 1300 feet elevation so it drops about 300 feet in elevation over a distance of about 3000 feet. See map image attachment. The maps in the Final EA do not show anywhere near this level of detail and I am sure the FS has access to more sophisticated maps than my GMap rendition. The point here - this is a considerable slope for the major watershed of a lake considering the risk for sedimentation, herbicide drainage, leaching of phosphorous, nitrogen and other conditions suitable to enhance algal blooms.