Protecting and restoring forests on New England's public lands
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October 15, 2024

Joshua Sjostrom
District Ranger
USDA Forest Service
Androscoggin Ranger District
300 Glen Road
Gorham, NH 03581

Re: One Mile Lonesome Ridge Scoping Comments from Standing Trees; submitted electronically via https://cara.fs2c.usda.gov/Public//CommentInput?Project=65064.

Dear Mr. Sjostrom,

Standing Trees submits the following comments regarding the U.S. Forest Service's "Scoping Letter" for the One Mile Lonesome Ridge Integrated Resource Project ("Project" or "IRP") located in the White Mountain National Forest in the Androscoggin Ranger District.

Standing Trees is an incorporated nonprofit dedicated to advancing policy and legal solutions that protect and restore New England's native forests. Standing Trees seeks to hold state and federal agencies accountable for their actions that affect forests, and to ensure that land-managers and policymakers follow the latest climate and biodiversity science.

Following are comments and questions about the Scoping Letter for the One Mile Lonesome Ridge IRP:

1. It is our understanding that no timber harvests are proposed within Inventoried Roadless Areas, but we would appreciate confirmation of this detail by depicting the Kilkenny Inventoried Roadless Area and any other IRA boundaries on all project maps as we have requested for previous projects.
2. As we have commented previously on other WMNF projects, the public's ability to understand and provide informed comment on WMNF projects is severely hampered

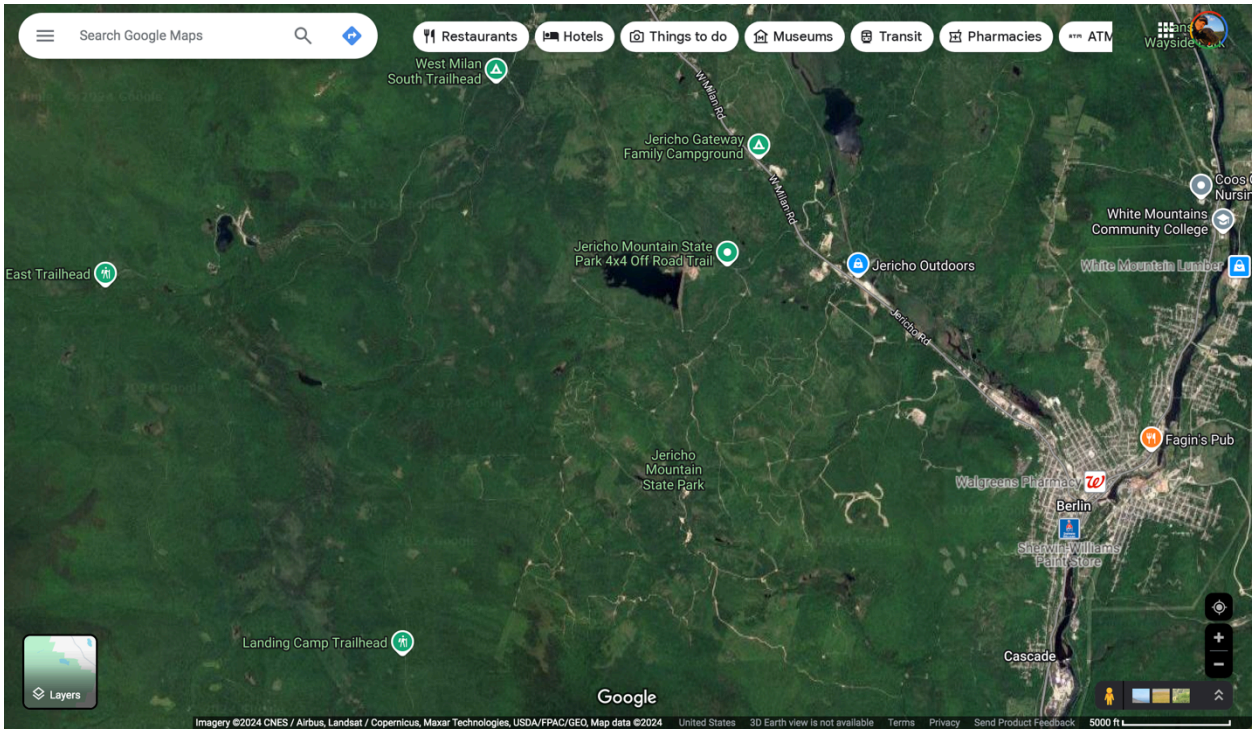
when key information is omitted from project maps. In the "Project Maps" section of the Scoping Letter, waterbodies are inconsistently depicted and labeled. For example, Bend and Brandy Brooks are only labeled on a subset of the provided maps, despite the fact that they are the focus of proposed "watershed restoration" actions (for example, they are unlabeled in Figure 2, showing proposed timber harvests). Furthermore, Godfrey Pond, the public water supply for 9,500 people in Berlin, NH, is only labeled on a subset of maps (for example, it is unlabeled in Figure 2, showing proposed harvests), and does not appear at all on several maps. York Pond is similarly missing. Topographic information, especially contour lines, are essential to be able to see how proposed harvests will impact water resources, but they are missing from Figure 2. The "Overview Map," Figure 1, should show other land ownerships in the project area as well as Forest Plan Management Areas, which are not depicted on any map.

3. As mentioned previously, Godfrey Pond is the water source for 9,500 people (see https://www.des.nh.gov/sites/g/files/ehbemt341/files/documents/2020-01/wcp-berlinwaterworks.pdf). In addition to being omitted from maps, as described above, Godfrey Pond is unmentioned anywhere in the project narrative. Significant logging, including both even-aged and uneven-aged cuts, are proposed in the Godfrey Pond watershed. How will proposed timber harvests, skid trails, log landings, road construction and reconstruction, and other project activities impact this public water supply? Will herbicides or other chemicals be applied in the drinking water supply watershed? How do intense storms associated with climate change make excessive runoff events an increasing threat to the public water supply, and how will proposed actions exacerbate these threats?

4. The Scoping Letter states that *"'The project area is located in the Headwaters Upper Ammonoosuc River Watershed which is classified as "Functioning at Risk" by the US Forest Service Watershed Condition Framework (WCF). The WMNF has developed a Watershed Restoration Action Plan (WRAP) for this watershed which includes several projects to improve function and move it towards the "Functioning Properly" WCF classification. The One-Mile Lonesome Ridge IRP presents an opportunity to implement elements of the WRAP for this watershed'"* (Scoping Letter at 2). Can you please update the project webpage with the Forest Service Watershed Condition Framework and the Watershed Restoration Action Plan for the Ammonoosuc River? How are proposed timber harvests compatible with the Action Plan and with all Forest Plan standards and guidelines, especially those related to water resources? What impacts will proposed timber harvests have on water resources in the project area, including Brandy Brook and Bend Brook?
5. Can you please update the project webpage with the 2015 Forest-wide Transportation Analysis Process (TAP) report (Scoping Letter at 3)?
6. In a "Supporting Documents" folder on the project webpage, can you please provide stand ages for all stands in the project area and any silvicultural stand exams or botanist reports? In the Sandwich VMP and Peabody West IRP, for example, old growth and/or old-growth habitat appears to have been identified in both project areas but was not reported in the HMU documents for either project. We expect that the HMU document for the One Mile Lonesome Ridge IRP will include an accurate representation of stand ages, unlike the aforementioned recent projects, and likely others.

7. The 2005 Forest Plan FEIS states that "Presently, there are no major insect and disease issues on the WMNF" (WMNF Forest Plan FEIS at 3-114). However, beech bark disease is singled out as a threat in the One Mile Lonesome Ridge IRP and other recent project EAs. The Forest Service has never explained the inconsistency between the Forest Plan FEIS and project-level determinations that beech bark disease must be addressed in virtually every proposed project.
8. The WMNF must perform a cumulative impacts analysis using, at a minimum, the analysis area that was the basis for the WMNF Forest Plan EIS analysis. The WMNF Forest Plan FEIS states: *"Forest Inventory and Analysis (FIA) data (Northeastern Forest Research Station, 1995; 1997) for the counties encompassing most of the analysis area show that the amount of seedling and sapling habitat (which encompasses the Forest's regeneration age class and some of the young age class) increased across the analysis area between the early 1980s and mid 1990s. This increase ranged from 20 to 88 percent in New Hampshire, Maine, and Vermont, with the greatest increase in northern New Hampshire. After these increases, seedling and sapling habitat represented about 15 percent of existing forestland across the analysis area*" (WMNF Forest Plan FEIS at 3-86). To the best of our knowledge, no update to the quantity of presently-existing "seedling and sapling habitat (which encompasses the Forest's regeneration age class and some of the young age class)" has ever been performed for any WMNF project. The One Mile Lonesome Ridge IRP is in the northernmost portion of the WMNF, and is surrounded by the region of New Hampshire with the highest levels of active logging and therefore the highest levels of seedling and sapling/regeneration age class conditions. In order to demonstrate that there is a need for such habitat, the WMNF must establish a

baseline of current conditions across land ownerships, as was done for the Forest Plan EIS. The private and non-federal public lands immediately surrounding the One Mile Lonesome Ridge Project area continue to be heavily logged and developed, as is evident from simple satellite observation (see Google Maps screen shot on the following page). High levels of logging on private and non-federal public lands in northern New Hampshire makes the mature and old forest habitat provided by the WMNF especially important.



9. The WMNF must develop a range of alternatives for the project. Alternatives should include:

    a. a rigorous No Action Alternative with a detailed discussion of the benefits of taking no action;

b. an Alternative that solely considers watershed restoration activities on Brandy and Bend Brooks and eliminates all timber harvest in the Godfrey Pond watershed to protect water quality for the Berlin public water supply;

c. elimination of timber harvests in mature and old stands to maintain consistency with Executive Order 14072 and to protect habitat for the endangered Northern Long-eared bat;

Thank you for your careful consideration of the preceding questions and comments. We welcome additional dialogue about this and other projects in the WMNF.

Sincerely,

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