Lost River Integrated Resource Project Draft Environmental Assessment Comments

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To: White Mountain National Forest, Pemigewasset Ranger District

Thanks for this opportunity to comment on the Lost River Integrated Resource Project. I appreciate the work by the White Mountain National Forest (WMNF) to facilitate public engagement on this and other projects with open houses, public comment periods, and substantive responses to public comments.

I am a long-time New England resident who grew up less than a one hour's drive away from the Lost River area. As a teenager, I backpacked extensively across the White Mountains, criss-crossing the whole Appalachian Trail corridor from Hanover to Maine twice and visiting numerous other side trails, summits, and untrailed areas. The wild feel of the White Mountains had an outsize role in helping me fall in love with wild places and helping me commit more of my life to their protection, within a broader interest in figuring out how our human systems can co-exist more sustainably with other life on our planet. As an adult, I continue to visit the White Mountains, including Elbow Pond and some of the untrailed areas of the Lost River IRP.

I am concerned that the Lost River IRP would disproportionately impact some of the wildest unprotected parts of the National Forest, with more than 91% of all proposed logging within two Inventoried Roadless Areas. Only 3.3% of New England is permanently protected to let natural processes prevail, and conservation groups, ecologists, and state agencies all widely agree that we need to greatly increase the amount of "wildlands" in New England to at least 10% of the landscape. Inventoried Roadless Areas are the wildest unprotected parts of the National Forest system, and the Lost River EA should take a much harder look at the value of preserving the Lost River area as wildlands within the context of the whole New England region.

My primary concern with the Lost River IRP is that the draft Environmental Assessment (EA) is brief, does not provide compelling reasons why the WMNF needs to carry out this plan, and does not thoroughly examine alternatives or the likely negative environmental impacts of the proposed action.

In the Alternatives Analysis section (p. 16), the only alternative the Forest Service brings up with regard to timber harvests is a "no-action" alternative, which they cursorily discuss in half a page. Specifically, the EA writes that:

> *In the absence of a substantial disturbance, old growth characteristics would develop over time, as understory shade would delay, suppress, and restrict regeneration to shade tolerant species. Herbaceous vegetation would continue to be limited due to a lack of light. Mortality of white ash, aspen, and paper birch would continue as trees age and seed sources would be eventually lost. Beech, sugar maple, hemlock, and red spruce would progressively dominate the overstory, though some would prematurely succumb to disease and die. Gaps created by fallen trees would quickly close as adjacent overstory trees take advantage of available light and growing space making establishment unlikely and infrequent. Young regenerating stands would not establish and over time, the landscape would trend toward a homogeneous even-aged structure and species mix.*

The EA provides no citations to support the conclusory, prescriptive claims made in this section, which lead to the overall misguided conclusion that "diversity of age and structure in the HMUs would remain relatively limited, and wildlife habitat diversity objectives of the forest plan would not be met."

In fact, there is robust evidence that the development of "old growth characteristics" across a landscape by passive restoration is exactly the process that accumulates a diversity of natural disturbances and leads to a diversity of habitat for all of our native species, in addition to other benefits like maximized carbon accumulation and flood control. As proof of this, one only need to look to the ecologically-comparable Adirondacks of New York, where nearly 3 million acres of public land have been left to rewild for over a century, and 3% of the landscape continues to be in early successional habitat stages, equaling at least as high a proportion as estimates for pre-settlement early-successional habitat in the region (Widmann et al., 2015, cited in Kellet et al., 2023). Similarly, studies in protected areas in Michigan, Minnesota, and Baxter State Park all show a mosaic of natural disturbances developing in unlogged areas that provide better habitat for a diversity of species than surrounding harvested areas, including species associated with "early-successional" habitat like the chestnut-sided warbler. Conversely, heavily harvested areas in places like the US Southeast continue to show declines of the early successional species that these harvests purport to help.

The hydrology section (p. 23) is another example of inadequate and conclusory analysis in the Lost River EA. This section concludes that the project would have no impacts on water "quality or quantity" because it generally does not exceed blanket thresholds for the proportion of entire watersheds that are logged — no more than 20% of a watershed harvested in total, and no nomore than 15% with even-aged methods. This approach contravenes very basic common sense, because hydrologic impacts are not a simple yes/no issue - rather, the more a landscape is disturbed, the greater the hydrologic impacts one can expect, so it doesn't stand to reason that any actions under a certain threshold would automatically have *no* measurable effects. The EA's approach also includes no discussion of the slope of the logged lands within a watershed, which, in addition to area, has a direct impact on the runoff, erosion, and nutrient loss one could expect following timber harvest. Finally, the EA does not discuss the increase in extreme precipitation that our region is experiencing due to climate change, which experts unanimously

expect to worsen in the coming decades. For all these reasons, it is not reasonable for the Lost River EA to conclude that the project would have no significant impact on water resources.

The brief and unsubstantiated nature of the Lost River Environmental Assessment is particularly concerning for me for two additional reasons. First, because I have visited comparable logging projects in the Sandwich Range and other parts of the WMNF, where the timber sales seems to be poorly executed, to the extent of showing many visible examples of probable contract violations of the sale agreements. Banks along skid trails and haul roads were undercut, skid trails ascended very steep slopes with widespread erosion and inadequate water control features, slash was not evenly distributed back across the landscape, and streams flowed in the middle of a patch cut with no buffer. This shows me that the WMNF is not able or willing to carefully implement whatever logging plan it does put forward (particularly in a time of widespread staffing cuts), and makes me doubly wary about nonspecific, threadbare analysis for heavy logging, including, for example, 206 acres of “clearcuts with reserves” as in the Lost River project. Secondly, there is also evidence that the National Forest staff across the country have for years been pressured by Forest Service leadership to “streamline” the environmental review process and minimize ecological concerns to maximize National Forest timber output. This is extensively documented in a FOIA request focused on the Pacific Northwest region (https://storymaps.arcgis.com/stories/95e01949e33341a993f977c57cbf3c20), but this request also revealed that the Eastern Region, including the WMNF, is another of the three regions that Forest Service leadership has pushed to have the greatest increases in timber output.

Thank you for this opportunity to comment and for your commitment to our public lands.