Lost River Integrated Resource Project
Draft Environmental Assessment 30-Day Comment Period Summary and Response Report

August 2025

Summary of Public Involvement to Date

This document provides a summary of the public involvement process and comments received during the 30-day comment period for the draft environmental assessment (EA) and preliminary finding of no significant impact (FONSI) for the proposed project.

The project was published on the White Mountain National Forest (WMNF) Schedule of Proposed Actions (SOPA) on April 1, 2023. The Pemigewasset District Ranger visited the Woodstock and Lincoln Board of Selectmen in May 2023 and the Woodstock Planning Board in June 2023 outlining the proposal development and National Environmental Policy Act (NEPA) process and providing WMNF contact information. The District Ranger hosted a proposal development public open house on May 25, 2023 to gather public feedback on the local area and initial thoughts on potential actions in the area. A public scoping comment period was initiated on September 7, 2023. The scoping letter was sent to over 570 recipients and a notice was published in the Littleton Courier. The WMNF received 30 letters by the online portal during the scoping period and a comment summary and response report was published to the project website. The WMNF completed the effects analysis and published the Draft Environmental Assessment (EA) and Preliminary Finding of No Significant Impact (FONSI) to initiate a 30-day comment period on April 15, 2025. The notice of availability was sent to over 670 recipients and a legal notice was published in the New Hampshire Union Leader. A public project presentation and open house was held by the District Ranger on April 24, 2025 at WMNF headquarters to compliment the 30-day comment period. The Pemigewasset District Ranger visited the Woodstock and Lincoln Board of Selectmen in May 2025 to present a summary of the project, the effects analysis, and how to comment. The WMNF received 146 letters by phone and the online portal during the 30-day comment period. All comment letters were reviewed by the project team and saved in the project record. Comments were organized by topic or resource issue. Table 1 presents a representative summary of the range of comments received by resource topic. Table 2 presents consideration of literature submitted by commenters in support of their comments.

Next Steps

Comments are used to help the project team refine the proposed action, evaluate potential alternatives, identify relevant issues for analysis, develop project design elements or other minimization measures, and refine the environmental analysis. Table 1 provides a representative summary of the range of comments received during the 30-day comment period, organized by general resource area or topic.

The project team is currently completing the final EA and FONSI and developing the draft decision notice for the Lost River Integrated Resource Project. A 45-day objection period for the draft decision notice is planned for early August. Parties that submitted comments during a designated public comment period (e.g., either the scoping or 30-day comment period) may be eligible to object. For additional requirements regarding the objection period, refer to the legal notice for the 30-day comment period available on the project website.

Summary of Comments Received

Table 1. Summary of comments received, organized by general resource area or topic. Original comment letters are filed in the project record.

Resource/Topic	Summary of Comments[1]	Response Summary
Water Resources	• Project hydrology section does not include effects due to slope steepness or increased extreme rain events. • Current condition data is not collected to establish a baseline for all waterbodies in the project area, it is impossible to take a hard look without this baseline. • The Forest relies solely on the basal area removal metric to conduct water quality analysis, based on the non-peer reviewed hydrology white paper, with no site-specific analysis or baseline data.	• Slope is considered by engineering and forestry. As project slopes have been deemed acceptable for these units, there are no concerns from hydrology. Research from the local Hubbard Brook Experimental Forest describes that timber harvest in a watershed below 20 percent of the watershed harvested will result in no changes to water quantity. All watersheds are kept below this 20 percent threshold, thus no changes to water quantity are expected due to project activities. Though increasing precipitation events related to climate change may result in sporadic higher water quantities, this would occur regardless of project actions. • Research from the area indicates that harvesting 20% of watersheds using all methods and 15% of watersheds using even-age regeneration methods will result in negligible changes to water quality, including nutrient content. All watersheds within the project area were kept below both thresholds, thus indicating that no water quality changes will result from project actions. Additionally, water quality data is published for public use via monitoring reports (https://www.fs.usda.gov/r09/whitemountain/planning) after a complete dataset is collected. This includes pre-, during, and post-harvest data. • Local, peer-reviewed data from Hubbard Brook Experimental Forest is the basis of the water quality and quantity white paper. The white paper does not seek to present new data, rather, it synthesizes years of research into a useable form for the WMNF. The desktop analysis is the first step in reviewing project impacts to water resources. Watersheds in the project area are analyzed for basal area removal from the proposed timber treatments. Following this, field work is conducted to validate findings from the desktop analysis, work with foresters to protect sensitive areas, and establish riparian management zones.
Fire Risk	• The Lost River Project will cause more fuel buildup and make the area more at risk to wildfires.	• A fire and fuels analysis will be added to the Lost River Final EA. The vast majority of the project area is in the low to very low range for several factors related to wildfire risk, including flame length, flame spread rate, heat, and intensity (IFTDSS Landfire Modeling 2024). These factors, combined with the spread of treatment units across the project area, different treatment types, and project implementation being conducted over a 5 year period, lead to low risk of a wildfire occurring due to project activities. In the unlikely event a wildfire does occur due to project activities, the WMNF has fire staff and equipment readily available to respond to a fire incident if needed.
Roadless Areas	• Over 91 percent of the proposed timber harvesting occurs in designated roadless areas. The Forest should not be harvesting timber in protected designated roadless areas.	• The effects to a Forest Plan Inventoried Roadless Area are determined based on the percentage of the roadless area being harvested, not the percentage of the proposed timber harvest that lies within Inventoried

[1] Summary provides a broad overview of the range of comments received and is not intended to represent specific, individual comments.

Resource/Topic	Summary of Comments[1]	Response Summary
	• The Forest Service arbitrarily manages Forest Plan Inventoried Roadless Areas with lesser protections than areas designated under the 2001 Roadless Rule, when they should be treated equally. Both types of inventoried roadless areas merit protection and special consideration, including under NEPA, not merely because they contain the potential for eventual wilderness designation, but also because of their inherent value as watersheds and biodiversity hotspots. • The Lost River project proposes vast amounts of timber harvest, with all its devastating impacts on roadless values, in several Forest Plan IRAs.149 And the Project will directly impact one RACR IRA with limited road construction and result in indirect impacts from other Project activities on adjacent lands. • The Forest Service must more fully acknowledge any significant impacts to roadless areas likely to result from the proposed actions and consider, in detail, at least one alternative that would avoid, or at least significantly mitigate, such impacts.	Roadless Areas. During the last Forest Plan revision in 2005, it was determined that if less than twenty percent of a roadless area was harvested for timber within a ten-year period, it would not be disqualified for wilderness potential (Roadless Background Information, USDA, 2024). The effects analysis for Lost River determined that at most, seven percent of the Jobildunk Inventoried Roadless Area and six percent of the North Carr Mountain Inventoried Roadless Area would be harvested for timber over a ten-year period, therefore neither would be substantially changed in character due to the Lost River Project. • Forest Plan IRAs are not protected by Federal Regulations (36 CFR 294) as RACR areas are. There is no timber harvesting being proposed in RACR. The White Mountain National Forest analyzes effects to Forest Plan IRAs to ensure that management activities will not take the roadless area out of potential wilderness consideration. In the case of timber harvesting, the White Mountain National Forest determined that if harvesting in any specific IRA was limited to less than 20% over a ten year period, it would not be substantially noticeable and in line with the recommendations of Chapter 70 of the Forest Service Handbook, 1909.12. Effects to watersheds were analyzed by the project Hydrologist and disclosed in the Draft EA. The project will increase age-class and wildlife habitat diversity, which will improve biodiversity. • Effects to the Carr Mountain RACR area due to the reconstruction of Elbow Pond Road are consistent with 36 CFR 294 (2001) and are disclosed in the Draft EA. The road relocation will benefit water quality, soil stability, nutrient cycling, and wildlife habitat by removing the road prism from the beaver wetland. All timber harvesting in Forest Plan IRAs is below the 20% threshold combined with all other harvesting in the IRAs over a ten year period (Draft EA, Table 5, p. 22). No indirect effects to RACR roadless areas were identified due to proposed timber harvesting or recreation management activities during the effects analysis. • Due to the proposed timber harvesting being kept under the 20% threshold cumulatively for all IRAs in the project area over a ten year period, and the road relocation being consistent with the direction in 36 CFR 294 (2001) a finding of no significant impact was determined for inventoried roadless areas. There is no requirement for the Forest Service to analyze in detail, or to consider, any alternative that does not meet the purpose and need for the project. Avoiding all harvesting in Forest Plan IRAs would not meet the project purpose and need (see NEPA Law/Regulation/Policy section).The Forest did analyze an alternative that would have reduced effects to the Carr Mountain RACR. Since it was determined the project will not significantly impact roadless areas, mitigation is not necessary.
Transportation	• Effects were not conducted for road reconstruction or skid trail construction. • There is no detailed analysis of the potential for roads and skid trails to contribute to water quality issues and flooding through increased erosion and sedimentation, soil	• Road reconstruction and road maintenance, log landing creation, and skid trail layout are all analyzed under the timber harvesting proposed action, because they are all used strictly for timber harvesting implementation. Road reconstruction and road maintenance are conducted on established roads that are improved to support heavy equipment use. Skid trails are laid

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	compaction resulting from the use of heavy machinery used to achieve the proposed road activities, and renewed fragmentation of wildlife habitat, among other things. • "Some roads cross perennial streams, making their change in status at odds with the Forest Plan, which states: "Existing roads, facilities, campsites, or trails within 100 feet of perennial streams or ponds should be considered for relocation as part of normal project planning, except when doing so would result in greater overall impact to the land or water resource." • The Forest Plan also states that existing roads should be considered for decommissioning (a) when there is no longer any need for the road; (b) when alternative routes may be available; or (c) to protect natural and cultural resources or to meet other resource needs.154	out with input from resource specialists to determine avoidance areas. Forest Plan direction, best management practices (BMPs), and project-specific design features are followed to minimize effects to resources. • BMPs are employed to reduce the effects of sedimentation on water quality. Annually, multiple resource specialists visit closed-out sites to monitor the effectiveness of BMPs. The Lost River IRP implements the Forest Plan, and the potential for activities involved in implementing the plan (including road and skid trail construction and maintenance) to contribute to habitat fragmentation was analyzed during its development (Final Environmental Impact Statement for the Forest Plan, pp. 3-196 to 3-202). Ultimately, the Forest Service determined that implementing the Forest Plan would result in relatively minor fragmentation effects across the Forest (p. 3-207). • This section of the Forest Plan states that roads within 100 ft of perennial streams should be considered for relocation (Forest Plan, p. 2-25). Where practical, relocations were considered and it was decided that in most cases, moving roads would result in greater resource damage than leaving them in their current locations. Part of the Lost River project proposes to relocate a section of Elbow Pond Road out of a beaver wetland which is consistent with this guideline. • Almost 10 miles of roads are being proposed for decommissioning as part of the Lost River IRP (Draft EA, p. 12; Draft EA Appendix D, pp. 46-48).
Wildlife Resources	• Do not build any new roads or trails, doing so will destroy wildlife habitat. • The Lost River project will provide more young-forested habitat and improve forest health and biodiversity for pollinator, bird, and other wildlife species. • The Lost River project, in conjunction with several other projects across the WMNF and GMFL National Forests, is going to negatively affect specific types of bird habitat, namely higher elevation boreal, swampy, slow stream forested habitats. • The Lost River Project will negatively affect an array of wildlife species that rely on intact forests for habitat. • Project activities will have an adverse effect on NLEB, will destroy and take away NLEB habitat, this does not need to occur. • Having an adverse effect on NLEB is a violation of the Endangered Species Act. • There is a known hibernaculum less than one-quarter of a mile from the project area boundary and about 1.3 miles from the closest proposed activity that could be affected by the project. • Not enough surveys have been conducted to verify NLEB presence with confidence.	• The only new trail or road building proposed as part of the Lost River Project is the 0.5-mile Elbow Pond Road Relocation. The relocation would add about 0.05-mile of length to the road, and would remove the road prism from a wetland habitat that will benefit multiple resources such as hydrology, soil, botany, and wildlife. • The WMNF agrees that the project is needed for increasing forest resiliency and wildlife habitat and age-class diversity. • "The Forest Service does acknowledge that project activities would affect the composition of breeding birds. Harvested areas would favor species that prefer early successional habitats. However, since most of the HMU would not be harvested, there would remain an abundance of habitat available for species that prefer mature forest. While the age class and tree species composition of the project area would be altered by vegetation treatments, there would be no net loss of total forested habitat. The highest elevation of a stand proposed for harvest under this project is 2660 feet above sea level. None of the forested stands at this elevation or lower support the thick, stunted spruce-fir habitat that harbor high-elevation species of concern such as the Bicknell's thrush or blackpoll warbler. There are a number of wetland and stream systems within the project area that support species dependent on these ecosystems, including the Canada warbler and several species of waterfowl. While some stands proposed for harvest are close to these valuable natural communities, the Forest Plan contains many Standards and Guidelines in place to protect wetland and

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	• No project-specific analysis was conducted for the NLEB. • No mitigation measures were put in place to minimize effects to the NLEB, including no tree cutting during the active season (April 15-October 31). • The current blanket Biological Opinion is not specific to Lost River which the Forest cannot rely on. • The Forest needs to analyze effects to other threatened species such as Canada lynx. • The Forest Service failed to provide Biological Assessments ("BA") for these species as part of the documentation for this Project. As further detailed below in this Comment, a project- and species-specific BA is required to "evaluate the potential effects of an action on listed and proposed species…[to] determine whether any such species or habitat are likely to be adversely affected by the action and is used in determining whether formal consultation or a conference [with the U.S. Fish and Wildlife Service ("USFWS")] is necessary.	riparian habitats (USDA Forest Service 2005; pp. 2-24 to 2-26), including no-cut buffer zones. The commenter mentions Elbow Pond, although no commercial vegetation treatments are proposed within 0.4 miles of its shoreline or adjacent wetland habitat. The WMNF proposes to relocate a section of Elbow Pond road out of a wetland which would improve wildlife habitat for several bird species as part of the Lost River Project. References: USDA Forest Service. 2005. White Mountain National Forest Land and Resource Management Plan. Campton, NH." • "The Forest Service acknowledges timber harvests proposed under the Lost River Integrated Resource Project (IRP) would have negative impacts on some wildlife species while benefitting others. Specifically, timber harvests would decrease the available habitat for species that depend on mature, interior forests for all or some of their life cycles. For example, there is likely to be less nesting habitat for ovenbirds after project implementation. On the other hand, species that require or prefer early successional forests, such as the chestnut-sided warbler, would benefit from the proposed harvests. The proposed action would change the wildlife species composition of the project area. All stands receiving commercial treatments will be allowed to revegetate, resulting in no net loss to forested habitat. There are a number of Standards and Guidelines in the Forest Plan (USDA Forest Service 2005) that would minimize effects to wildlife (2-33 to 2-36), including rare and unique habitats and wildlife species (2-13 to 2-16). Silvicultural treatments would be carefully planned to ensure that all existing habitats would not be minimized to the point that any wildlife species would be lost. This includes common species as well those designated as threatened, endangered, or sensitive. Additionally, project-specific design features have been added to the Environmental Assessment to further protect wildlife. The degree of forest management proposed would not disrupt migratory pathways. While the movements of animals may be impacted while the project is being implemented (e.g., due to an increase in noise), these effects would be temporary. Concerns related to impacts to the northern long-eared bat are covered in other responses and also pertain to other woodland bat species likely to occur in the project area. The project would adhere to the Bat Conservation Strategy (BCS), a document jointly developed by the Forest Service and the USFWS to minimize impacts to bats from forest management activities (USDA Forest Service 2024). This document is based on the best available science with respect to bat biology. References: USDA Forest Service. 2005. White Mountain National Forest Land and Resource Management Plan. Campton, NH.

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		USDA Forest Service. 2024. Bat Conservation Strategy for Forest Service-managed lands in the eastern United States. 167 p." • "The Forest Service determined the proposed project is likely to adversely affect the northern long-eared bat (NLEB), primarily because some of the proposed tree removal would occur while bats are active on the landscape and may be impacted directly if individuals are roosting in trees that are removed (USFWS 2025). This determination requires formal consultation with the U.S. Fish and Wildlife Service (USFWS) which was initiated on May 19, 2025. The project will adhere to the Bat Conservation Strategy (BCS), a document jointly developed by the Forest Service and the USFWS to minimize impacts to bats from forest management activities (USDA Forest Service 2024). In addition, there are a number of Standards and Guidelines in the Forest Plan that will minimize effects to bats (USDA Forest Service 2005; pp. 2-33 to 2-36). The Forest Service will also adhere to all stipulations in the forthcoming project-specific Biological Opinion from the USFWS. NLEBs are concentrated in maternity colonies during the maternity season. The severity of effects is expected to be highest if maternity colonies are impacted (USFWS 2025). When considering all tree removal activities likely to occur across all Forest Service units in Region 8 and 9 over the next fifteen years, the USFWS estimates these activities are extremely unlikely to impact 3% or more of NLEB maternity colonies range-wide (USFWS 2025). Therefore, the chance of this individual project impacting a maternity colony is low. It is also important to mention that while forest management can adversely affect individual bats, the Forest Service and USFWS agree that there are benefits as well. For example, there is evidence that the species does well on landscapes managed for a diversity of age classes (Silvis et al. 2016, USFWS 2022), and age class diversification is a key objective of this project. References: Silvis, A., R.W. Perry, and W.M. Ford. 2016. Relationships of three species of bats impacted by White-Nose Syndrome to forest condition and management. Gen. Tech. Rep. SRS-214. Asheville, NC: U.S. Department of Agriculture Forest Service, Southern Research Station. 48 pp. USDA Forest Service. 2005. White Mountain National Forest Land and Resource Management Plan. Campton, NH. USDA Forest Service. 2024. Bat Conservation Strategy for Forest Service-managed lands in the eastern United States. 167 p. USFWS. 2022. Species Status Assessment Report for the Northern long-eared bat (Myotis septentrionalis), Version 1.2. August 2022. Bloomington, MN. 169 pp. USFWS. 2025. Programmatic Biological and Conference Opinion on the Effects on Indiana Bat, Northern Long-eared Bat, and Tricolored Bat from U.S. Forest Service Management Activities in the Eastern and Southern

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		Regions that Incorporate the U.S. Forest Service's Bat Conservation Strategy. Bloomington, Minnesota. 198 pp." • A determination of "may adversely affect" does not constitute a violation of the ESA. It means the action agency is required to complete formal consultation with the U.S. Fish and Wildlife Service (USFWS). This process was initiated on May 19, 2025. The Forest Service would adhere to all stipulations in the ensuing project-specific Biological Opinion from the USFWS. In addition, the Forest Service would follow all Standards and Guidelines laid out in the Forest Plan to protect bats (pp. 2-33 to 2-36) as well as the Bat Conservation Strategy (BCS), a document jointly developed by the Forest Service and the USFWS to minimize impacts to bats from forest management activities (USDA Forest Service 2024). This document is based on the best available science with respect to bat biology. The USFWS (2025) states that the collaborative development of the BCS has established a comprehensive, proactive strategy that will contribute to the conservation of BCS species, including the NLEB (p. 111). The USFWS also acknowledges other efforts the Forest Service has made that contribute to the recovery and conservation of bats. • The BCS also requires buffer zones around known hibernacula within which certain activities must be restricted (USDA Forest Service 2024, p. 69-90). The sizes of these buffer zones are based on the number and species of bats documented within a hibernaculum (USDA Forest Service 2024, p. 71-74). Based on count data provided by the New Hampshire Fish and Game Department, no buffer zones would overlap with any proposed activities. Thus, the project would not violate the BCS. Note: According to New Hampshire Fish and Game Department data, zero bats of any species were observed in the hibernaculum during the most recent survey in 2022. Buffer distances based on counts from a 2007 survey (when bats were present in the hibernaculum) would also not overlap with proposed activities. • As explained in the BE (pp. 11-12), the presence of the NLEB is reasonably expected within the project area and effects have been analyzed as if the species is present. The analysis would be the same if we documented presence through a rigorous acoustic survey effort. The USFWS does not require project-level surveys of listed bats for consultations under Section 7 of the Endangered Species Act. • The effects analysis for NLEB was based on the project-specific proposed actions in the project area. • Restricting harvest during the active season would most certainly limit impacts to the NLEB, but such a restriction would be detrimental to other project objectives. For example, scarification, or soil disturbance, is accomplished simultaneously during harvest operations in snow-free conditions and can increase the establishment of desired tree species that require soil disturbance to germinate (Gauthier 2016). Yellow birch is one of many species found in the project area that requires soil disturbance to regenerate adequately. This is necessary in northern hardwood stands with thin leaf litter that is easily matted down by snow and rain.

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		• The Biological Opinion was written before the effects analysis for Lost River was conducted. The Forest will not rely on it and an independent Biological Opinion will be prepared specifically for Lost River. • Impacts to the Canada lynx were analyzed in detail in the Biological Evaluation (pp. 10-11). Because of the low likelihood of lynx presence in the project area and because the project will have only small impacts to lynx habitat, the Forest Service determined that project may affect but is not likely to adversely affect the species. • An analysis of the potential impacts to the other species mentioned by the commenter are included in the Biological Evaluation. This Biological Evaluation considers and discloses impacts to the same species that are typically considered in a Biological Assessment (i.e., listed and proposed species as well as designated and proposed critical habitat) in addition to Regional Forester Sensitive Species. This document can be considered a combined Biological Evaluation/Biological Assessment and it provides information to the public about federally-listed and proposed species that might be impacted by project activities. A separate Biological Assessment would have looked the same (minus the discussion on Regional Forester Sensitive Species) and was not drafted for this project because the USFWS does not require one for the consultation procedures utilized for this project.
Climate Change	• Comments skeptical of the benefits to climate change and forest resiliency the project claims. Project activities will have adverse effects to carbon and climate change; the Forest needs to do an adequate analysis of carbon and climate change impacts. • The Draft EA left out climate change as an analyzed resource when during scoping the Forest stated it would be analyzed. • Eastern forests have great potential to store and sequester carbon, and old forests are better at storing and sequestering carbon than younger forests. The Forest must protect and avoid mature and old forests to preserve these qualities.	• A carbon section will be added to the Final EA. The Forest has a Carbon White Paper. A Carbon Specialist Report and Climate Adaptation Workbook were completed for this project. These are in the project record and used to determine project effects to carbon within the scope of the WMNF. The planned actions aim to enhance compositional and structural diversity within the project area consistent with objectives of the forest plan and will increase species and habitat diversity, which will improve the ability of the ecosystems within the project area to respond to changing climate trends and stressors. Additionally, the treatment objectives will result in a future forest cohort that is healthier and better adapted to climate stressors, meaning they are likely to sequester and store carbon more efficiently and potentially persist on the landscape longer. Project activities affect a relatively small amount of forest land and carbon. In the short-term, activities are likely to contribute an extremely small quantity of greenhouse gas emissions relative to national and global emissions. Project activities will not convert forest land to other non-forest uses, and carbon will be removed from the atmosphere over time as the forest regrows. Therefore, effects of the project activities on carbon, greenhouse gases, and climate overall will be negligible. • Since scoping, white house direction has been updated and climate change was considered by resource, as was stated in the Draft EA. For example, hydrology considered the effects of more extreme rain events as part of their effects analysis. • The majority of wood harvested from the Lost River project will continue storing carbon to varying degrees as long as it remains a wood product. Carbon sequestration may increase as individual trees age, but at the stand

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		level overcrowding, disease, competition, and mortality that leads to carbon release affect the stand's ability to maximize carbon sequestration.
Recreation	• General support for the creation and management of the Lost River Overlook. • Reopen the Mt. Cilley trail to ease the congestion from other nearby recreation areas. • Suggestion to install signage around the historic trails in the project area to retain their story before they are decommissioned. • Support for removing camp sites from the immediate vicinity of Elbow Pond as part of the Camping Area Redesign. • The Elbow Pond Camping Area is historically unwarranted, has had management and rule enforcement challenges in the past, and is a waste of federal resources. The camping area hinders day use of the boat launch and campers cause a lot of damage. • There has been historical monitoring and enforcement challenges at the Elbow Pond Camping Area, and the redesign is expected to have the same or worse challenges. Consider not increasing the number of campsites, and stick to relocating problematic sites away from the water while improving their footprint with rules and a designation. Also consider making changes to improve rule enforcement, such as more patrolling, camp site registration, or fines for damage and waste. • Do not decommission Gordon Pond Trail, it is a quiet, beautiful trail that accesses Gordon Pond. There are not enough quiet trails on the WMNF like the Gordon Pond trail. There are alternatives to closing that section of trail, such as: Create a trailhead on Reservoir Road, create a trailhead on the easement for Woodstock parcel 206-041, acquire Woodstock private parcels 206-003 or 206-001 to improve WMNF land connectivity Improve signage along Route 112 Acquire, or build a parking area along Route 112, build a longer trailhead, obtain an easement on private land	• The WMNF agrees that the creation of the Lost River Overlook would improve the recreation experience for the public traveling along route 112. After internal deliberation, the responsible official decided to remove this activity from the proposed action of the Lost River project. • The 4-mile Mt. Cilley snowmobile trail is a White Mountain National Forest System trail that overlays Forest Road 166. Visitors are welcome to use snowmobile trails including the Mt. Cilley trail (FR166) during snow free periods for non-motorized uses including hiking and mountain biking. • The White Mountain National Forest values and seeks to honor the many layers of history imbedded over so much of the Forest landscape. There are many stories to tell and although the Forest has limited capacity to interpret the rich history of the landscape, we welcome the opportunities to work with volunteers and partners to assist in interpretation while also being mindful to preserve and protect heritage resources. • The Forest Service will be decommissioning the campsites within 100 feet of Elbow Pond. Camping at Elbow Pond will be by designated site only per Forest Supervisor Special Order. • The Elbow Pond camping area redesign purpose and need directly relates to addressing camping impacts on the pond shoreline and impacts to day-use recreation experience of the pond. Campsites within 100 feet of Elbow Pond will be eliminated and camping will be restricted to designated sites only. Patrol of Elbow Pond occurs commensurate with staffing capacity and funding which fluctuates from year to year. That said, the Forest has partnered with local law enforcement to increase security and presence. Additionally, the Forest continues to work with volunteers and is seeking additional partners to assist with visitor information and site maintenance. An entrance sign will be posted as will rules of use at each numbered campsite. The area will receive increased patrols by Law Enforcement Rangers to enforce the new Special Order requiring camping at designated sites only. • The Forest is committed to patrolling Elbow Pond area commensurate with staffing capacity and other priorities. To this end we have partnered with local Law enforcement who provide additional patrol and presence in the area. Once the redesign is implemented and camping is by designated sites only, Forest Service Law enforcement will increase patrol presence to ensure compliance with the Forest Supervisor Special Order. The Elbow Pond Camping Area redesign will include a phased implementation which will focus on establishing new sustainable campsites to replace the ones that will be closed within 100' of the lakeshore. Although the potential for up to 18 total sites was analyzed, we may not construct that many. There are 12 existing campsites, initially we will focus on maintaining that number and building out to the full 18 as dictated by our monitoring.

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		• The decommission of Gordon Pond Trail will not prevent hikers from using the trail as an "off trail route." The decommission will only effect future maintenance and funding for the hiking trail which will no longer occur. The trail will be allowed to become wild again and will provide for a more quiet and challenging experience for bushwacking and enhance wildlife values surrounding the trail corridor. The Forest Service explored a variety of alternatives prior to reaching the conclusion for decommission including an alternative trailhead off Sunset Road which ultimately was found to be untenable due HOA covenants. Reservoir road is likewise hindered by private road interests and acquiring a private land parcel in this area is a very low priority for our Lands and Realty program which has a limited budget for land acquisitions. Highway 112 has an approximately 14 mile no-parking zone in the vicinity of the current trailhead. Historically parking had occurred at Govoni's Italian Restaurant but when the restaurant closed the parking for Gordon Pond trailhead was eliminated from highway 112. The decommission alternative was selected after evaluating all other options for access to this trail. Primary access to Gordon Pond will still be available via the Kinsman Trail and Beaver Brook Trailhead.
Scenery Resources	• The Lost River project will negatively affect the wild beauty and scenic views of the forest. • The Lost River project will be detrimental to the New Hampshire tourism industry by negatively affecting the beautiful views of the forest. • Forest Plan Scenery guidelines are being exceeded for maximum observed size for the Mount Tecumseh viewpoint, for which no rationale was given. The proposed activities must be in line with Scenic Integrity Objectives. • Other minimization measures that would reduce visible acres were not fully explained in the scenery report.	• The White Mountain National Forest acknowledges there will be effects to the scenic landscape due to project activities, these effects are disclosed in the Draft EA and Lost River Scenery Report. The project is in compliance with the Forest Plan, any action that is outside Forest Plan guidelines are documented with rationale on the responsible official's decision to exceed the guidelines for Scenery Management. • The assertions that the Lost River Integrated Resource Project will harm New Hampshire's tourism industry by negatively affecting views overlooks the project's alignment with the long-term sustainability of the forest landscapes that have attracted visitors to the region previously. Tourism in New Hampshire is deeply tied to healthy, accessible, and visually appealing forests- values that this project directly supports. The Lost River IRP has been carefully designed to maintain and, in many cases, enhance the aesthetic and recreational appeal of the White Mountain National Forest. Visual quality is a key component of the project planning process, and treatments are strategically placed to avoid or minimize impacts to views from major recreation areas, scenic byways, and popular trail systems. The project also contributes to long-term forest health by reducing overcrowding, increasing structural diversity, and building resilience to insects, disease and climate stressors. These efforts help protect the very landscapes that support hiking, wildlife viewing, foliage tourism, and other outdoor recreations activities that drive the regional economy. Rather than detract from tourism, the Lost River IRP is an investment in sustaining the beauty and ecological function of the forest for generations of visitors to come. The WMNF acknowledges there will be effects to visuals due to project activities. These effects are disclosed in the EA and Scenery Specialist Report. • The Scenery guideline would be exceeded for 4 clearcut units at one viewpoint, Mount Tecumseh. The Forest Plan states "A guideline also is a

Resource/Topic	Summary of Comments[1]	Response Summary
		required course of action or level of attainment, but permits operational flexibility to respond to variations in conditions. Guidelines can be modified or not implemented, but the rationale for doing so must be documented in a project-level analysis and signed decision." (Forest Plan, p. 2-3). The rationale for the responsible official deciding to exceed the scenery guideline at the Mount Tecumseh viewpoint is documented in the Draft EA and will be documented in the forthcoming Draft Decision Notice. • The scenery report will be revisited to clarify how minimization measures reduce visible acres to the viewpoints listed.
Vegetation Management	• The Lost River project will destroy old-growth forest habitat. • Do not cut down 11,000 acres of trees in the WMNF. • Harvesting has been proposed on the slopes of Mount Moosilauke which will negatively impact the mountain. • The Lost River project will cause long-term harm to the forest that will take generations to recover from. • The WMNF cannot harvest timber on federal lands that were formerly protected. • Lost River is deforestation and affects the state taxpayers as a whole. • Comments that state clearcutting leads to wildlife habitat destruction and negative visual effects. • There is a lot of evidence (Widmann et al., 2015) that natural processes lead to a diverse and healthy habitat with adequate amounts of early-successional habitat. Heavy harvests bring decline of early-successional species. • The WMNF poorly administers timber management in other areas of the Forest and this will lead to poor management of the Lost River Project administration. • Timber harvested in the east is not used in the east. Continue purchasing timber from other parts of the continent instead of harvesting Federal protected land. • There is clear scientific evidence for increasing amounts of old, wild forest, and only 4% of New Hampshire (and a similar amount across New England) is managed to permanently protect or restore old forest conditions, with a primary emphasis on supporting native biodiversity, natural processes, and climate stabilization. Additional science supporting permanent protection and restoration of old forests was recently published, including a study released in early 2023 identifying the major problems with forest management promoting early successional habitat. • The Forest Plan defines old forest habitat as: “[d]esired habitat conditions start with those for mature forest and can include greater size, decadence, structural complexity, etc.	• The WMNF identifies Old Growth based on the definition in the Forest Plan glossary. All treatment units in the project area were inventoried and do not meet the Old Growth Forest definition listed on page 21 of the Abbreviations, Acronyms, and Glossary section of the Forest Plan. • The Lost River Project proposes timber harvest of about 1,093 acres of National Forest System land deemed suitable for timber harvesting. The WMNF harvests about 2,500 acres, or about 0.3% of the forest annually across all three districts. An 11,000-acre project has not been proposed on the WMNF. • There will be no vegetation management activities on the slopes of Mount Moosilauke. The closest units to Moosilauke summit are about 3 miles away and occurs on the east flank of Blue Ridge which is not part of Mount Moosilauke but rather a ridge approach to Mount Waternomee. The units are separated from Moosilauke by topography and exist in a different drainage. • Page 5 of the Draft EA describes that all stands proposed for timber harvesting have site-specific objectives and corresponding silvicultural prescriptions to achieve the desired conditions for vegetation and/or wildlife habitat. Meeting these objectives means that management is improving conditions for vegetation and/or wildlife habitat, not harming. The National Forest Management Act (NFMA) requires adequate stocking of commercial species within 5 years of a regeneration harvest, often times happening within the first growing season after the harvest due to intense competition for sunlight and growing space. Along with rapid growth, mitigations such as water bars on skid trails and stream buffers are utilized to prevent runoff and threats to water quality. • The Lost River project is proposed on National Forest System land designated as Management Area 2.1 - General Forest Management, which permits timber harvesting as part of the purpose for MA 2.1 land management. The project will follow all law, regulation, and policy pertaining to public land management. The goals and objectives of the Lost River IRP are in line with the WMNF Forest Plan and the National Forest Management Act. The comments do not specify what is meant by "formerly protected lands". The WMNF is not proposing timber harvesting in any areas that prohibit such an action, such as wilderness areas and roadless areas designated under the 2001 Roadless Rule. No National Forest Service land

Resource/Topic	Summary of Comments[1]	Response Summary
	No harvest will occur in stands identified to provide old forest habitat." From the Draft EA, which denies that the Project affects any old forests, it is impossible to discern whether any portions of the Project area have the potential to provide old forest habitat and to conclude that the Project complies with the Forest Plan's protections for such habitat.	designated as Management Area 2.1 in the project area was formerly designated as an area that prohibited timber harvesting activities. • The definition of "deforestation" accepted by most land managers and researchers is as follows: "the conversion of forest to other land use independently of whether human-induced or not." That is, deforestation is essentially referring to a change in land use, not in tree cover (FAO 2022). The vegetation management activities proposed under the Lost River Project would not result in a change in land use. The forest will remain forest and will provide an increase in regeneration age-class habitat for years as the forest regrows. The increase in regeneration age-class will provide foraging habitat for moose, deer, bats, and several species of songbirds. References: FAO. 2022. The State of the World's Forests 2022. Forest pathways for green recovery and building inclusive, resilient and sustainable economies. Rome, FAO. https://doi.org/10.4060/cb9360en. • Page 5-6 of the Draft EA discusses that the lack of age class diversity on the landscape within the project area puts the landscape at risk to large scale environmental stressors and that regeneration-age stands are limited within the project area. Clearcutting is the primary method to achieving one of the project's goals of increasing age-class, species, and wildlife habitat diversity and fostering the regeneration of stands by creating regeneration aged stands. This management is done within the Scenery Management System; stands identified for clearcutting comply with Scenic Integrity Objectives identified in the Forest Plan. • The Elbow Pond and Franconia Notch HMU's combine to be 35,680 acres in size, of which only 7,254 acres are considered suitable for harvest, roughly 20%. This means that roughly 80% of the landscape will be passively managed through natural processes. The commenter provides an example from the Adirondacks that 3% of the landscape is managed for early successional habitat which aligns with pre-settlement conditions and implies this is a sufficient amount of early successional habitat. Meeting pre-settlement conditions is not a goal or objective in the WMNF Forest Plan. The Lost River IRP proposes establishing as much as 237 acres of early successional habitat, which is roughly 1% of the combined HMU's, well under the commenter's example. • The assertion that past timber management elsewhere in the White Mountain National Forest has been poorly administered, and that this will inevitably result in poor administration on the Lost River IRP is speculative and not supported by the project-specific analysis presented in the Draft EA. The Lost River IRP has been developed under current forest plan guidelines, incorporates best available science, and includes robust oversight, site-specific prescriptions, and clearly defined performance standards. Timber management in this project will be governed by a regulatory contract structure (36 CFR 223.30) that includes detailed operational requirements, environmental protections and strict compliance measures. These contracts are designed to ensure accountability at every phase of implementation. In addition, timber management will be overseen

Resource/Topic	Summary of Comments[1]	Response Summary
		by a dedicated and experienced administration team committed to upholding the goals of the forest plan, ecological integrity and sustainable forest management. The team will utilize site-specific prescriptions and conduct post-implementation resource monitoring to ensure project objectives are met and resource values are protected. The Lost River IRP reflects modern, science-based planning and should be evaluated on its own rigorous merits. • While it's true that timber markets are interconnected, and some wood harvested in the East may be sold or processed elsewhere, that doesn't mean that eastern states do not benefit from local timber harvesting. Timber harvested locally supports local economies, sustains rural jobs and supplies regional mills with raw materials for construction, furniture and paper products. The idea of importing timber materials from other parts of the continent overlook several key issues: Local economic benefits: Eastern communities often rely on forest related industries. Harvesting timber locally supports employment, tax revenue and infrastructure development. When done responsibly, harvesting timber from federal lands can improve forest health, reduce wildfire risk and promote biodiversity. Ignoring active management can lead to overgrowth and pest infestations. Transporting timber across long distances increases carbon emissions and fossil fuel consumption. Using locally sourced wood helps lower the impact on our supply chains. The Forest Service sets industry standards and operates under strict environmental regulations to ensure sustainable and environmentally sound practices. Meeting the Forest Plan Goal of vegetation management: "The White Mountain National Forest will manage vegetation using an ecological approach to provide both healthy ecosystems and a sustainable yield of high-quality forest products, with special emphasis on sawtimber and veneer." (Forest Plan, p. 1-17). • Completely eliminating timber harvesting from the WMNF was considered but dismissed from detailed analysis during Forest Plan Revision due to the need for sustainable timber production being a fundamental purpose for the Weeks Act of 1911 and the Organic Administration Act of 1897 (Forest Plan EIS, p. 2-6). Wilderness areas currently make up about 18% of all WMNF land. RACR roadless areas make up another 30% of all WMNF land, about 7% of all WMNF land has RACR within a Management Area that allows timber harvesting. Only about 35% of all WMNF land is available for timber management. Management area conversion is beyond scope of the Lost River IRP. No old growth was discovered during project development. A response paper to Kellett 2023, signed by several university professors (King et. al.), has been published to the project website. • The Forest Plan definition is relevant to stands explicitly identified to provide old forest habitat and does not apply to all stands with attributes of the definition. The Elbow Pond and Franconia Notch HMU Rationale documents detail that a combined 7,254 acres are considered suitable for timber harvest, which is roughly 20% of the acreage within the combined HMU's. This means that roughly 80% of the combined acreage is unsuitable for

Resource/Topic	Summary of Comments[1]	Response Summary
		timber harvest and will be managed passively. Over time, this proportion will meet the definition of old forest habitat.
Soil Resources	• Timber harvesting as part of the Lost River Project will have a negative effect on the soil. • Skid trails are being proposed on slopes steeper than the 20% standard in the Forest Plan • No data collection was conducted to establish a baseline on current soil conditions	• Short-term negative effects to soil in the form of soil displacement and compaction are expected and analyzed in the Soil Specialist Report and summarized in the Draft EA. No detrimental soil disturbance due to timber harvesting is expected from the project. Following BMPs and project-specific design elements help to prevent detrimental effects to soil. Monitoring is performed before and after timber sales to assess effects. The Forest Service has a Forest Soil Disturbance Monitoring protocol that surveys units pre and post-harvest. Purchasers are required to follow BMPs and standards and guidelines, and the Forest Service has timber sale administrators on site to prevent detrimental soil disturbance. • Forest plan direction is a guideline, G-5 for Vegetation Management (Forest Plan, p. 2-30). The guideline states “Where exposure of mineral soil is expected, skid roads should generally be located on grades of less than 20 percent, with only short steeper pitches.” This is in line with what can be expected for skid trails to support timber harvesting for the Lost River project. • "Part of determining soil suitability is by working with the interdisciplinary team to assign each unit a season of harvest. Some soils are more resilient and can be harvested in summer and/or fall, whereas some units are designated as winter-only harvest if they aren't as resilient. Some information we use for soil condition is our Ecological Land Types (ELTs) which have information on soils and vegetation across the Forest. The soil scientist does fieldwork to confirm the ELTs for different units.
Beyond the Scope of the Current Proposal	• Comments referring to the Telephone Gap IRP on the Green Mountain Finger Lakes (GMFL) National Forest. • Do not impose H.R. 471, the Fix Our Forests Act.	• The Lost River project is not related to the GMFL Telephone Gap IRP. No spatial or temporal boundaries have been identified by the IDT between the two project areas, so no cumulative effects to Lost River are expected from forest management activities conducted on the GMFL National Forest. • The Lost River Project has not been proposed as part of the proposed Fix Our Forests Act bill, which has not been signed into law as of July 1, 2025 and which the Forest Service has been given no direction on.
Health and Public Safety	• The Lost River project will make it more hazardous to travel on the state highways with the heavy equipment that will be used during implementation, particularly route 118. • The Forest cannot determine that the Project will not have significant impacts on public health and safety based on a consistently safe history of implementing similar actions elsewhere on the Forest, because the Lost River project is a unique area and an independent safety analysis must be conducted to come to the conclusion. • The Forest would be safer if not harvested because old forests are best at mitigating damage due to high risk flooding, which is becoming more frequent due to the effects	• Under the Standard Provisions for a Timber Sale Contract, all timber purchasers must "furnish, install, and maintain all temporary traffic controls that provide the user with adequate warning of hazardous or potentially hazardous conditions associated with Purchaser Operations" (Timber Sale Contract, Division BT, section BT6.33). All heavy equipment operators are required to abide by state traffic laws when traveling along state highways. State highways are publicly available for use at any time as long as the user abides by state traffic law. Signs will be placed at every entrance to Forest Service roads off of state highways 112 and 118 during active timber hauling operations to raise awareness of activity to motorists and pedestrians. Timber operations on the WMNF have a consistently safe track record and no action proposed as part of the Lost River Project has been

Resource/Topic	Summary of Comments[1]	Response Summary
	of climate change. Old forests also mitigate algae blooms from forming by taking nutrients from the soil.	identified by the responsible official as being atypical to the point of raising safety concerns. • The Lost River project would be implemented using standard equipment, methods, and practices. Under the Standard Provisions for a Timber Sale Contract, all timber purchasers must "furnish, install, and maintain all temporary traffic controls that provide the user with adequate warning of hazardous or potentially hazardous conditions associated with Purchaser Operations" (Timber Sale Contract, Division BT, section BT6.33). All heavy equipment operators are required to abide by state traffic laws when traveling along state highways. State highways are publicly available for use at any time by any user as long as the user abides by state traffic law. Signs will be placed at every entrance to Forest Service roads off of state highways 112 and 118 during active timber hauling operations to raise awareness of activity to motorists and pedestrians. Timber operations on the WMNF have a consistently safe track record and no action proposed as part of the Lost River Project has been identified by the responsible official as being atypical to the point of raising safety concerns. • The project will temporarily modify 1,093 acres of NFS lands for age-class and wildlife habitat diversity, which will make the forest more resilient to the effects of climate change. No changes to water quantity or quality are expected as percentage of watershed harvested is being limited to 20% of watershed (all-harvest methods) and 15% of watershed (even-age harvest methods). Flood mitigation by forests is intended to be kept nearly in-tact by the riparian management zones along perennial streams. Proposed activities are not expected to make the area more susceptible to a flood event or drive an algae bloom from forming in any waterbody.
General Comments or Statements of Support/Opposition	• Comments that declare opposition to the project with general statements and no supporting rationale. • General statements of support for the project with broad rationale. • General statements that do not relate to the Lost River project Draft EA.	• The purpose and need of the Lost River 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. Monitoring confirms the Forest Service is successfully getting closer to Forest Plan goals and objectives for increased stand and age-class diversity (White Mountain National Forest 2024 Monitoring Report, pp. 47, 58, 62). All law, regulation, and policy requirements are being met through the development of this project, including NEPA, ESA, NHPA, and CWA. The Lost River project is within National Forest Service land designated as Management Area 2.1 - General Forest Management, along New Hampshire state highways 112 and 118. White Mountain National Forest 2024 Monitoring Report verifies that timber management is achieving desired future condition in harvested stands. • The WMNF agrees that the project is needed for increasing forest resiliency and wildlife habitat and age-class diversity.

Resource/Topic	Summary of Comments[1]	Response Summary
		• These comments are not considered because they are not about the project.
Cumulative Effects	• The Forest did not conduct a cumulative effects analysis, including other timber projects in close proximity to the Lost River project area. • The Forest did not consider age-class habitat located on private land in its Forest Plan goals and objectives assessment. • The Forest fails to identify the temporal and geographic scope of the effects for most resource areas.	• Cumulative effects were considered by the Forest Service for the Lost River project, spatial and temporal boundaries for each resource are noted in the project record. Cumulative effects for scenery, wildlife, and carbon were analyzed for in regard to timber harvesting. • The Forest has no jurisdiction over private land use or management; therefore, private land is not considered in Forest Plan age-class goals and objectives. • 36 CFR 220.7 does not require the Forest Service to state the spatial and temporal boundaries for each resource affected by the project in the Environmental Assessment. However, due to reasonably foreseeable actions in the project area, a boundary table will be added to the Final EA. If no measurable direct or indirect effects are found for a resource, measurable cumulative effects are highly unlikely to occur. Cumulative effects were analyzed by resource area.
FONSI/Affected Environment	• The Forest Service issued a Preliminary FONSI, contrary to NEPA and CEQ's directives. • The Preliminary FONSI fails to adequately characterize the potentially affected environment and degree of Project impacts. • The Forest Service resorted to simple numeric measurement of the size of the Project and the size of the WMNF (project area of 1,800 acres in relation to the over 800,000 acres of the whole Forest) improperly minimizes and obfuscates localized impacts from Project activities. • The Preliminary FONSI must "describe the impacts of the proposed action and any alternatives in terms of context and intensity as described in the definition of 'significantly' at 40 CFR 1508.27 ([1978)] and failed to do so. • The Preliminary FONSI contains only a cursory review of the "degree" factors in the 2020 CEQ regulations, focused on summarizing the Draft EA's analysis of the "beneficial and adverse effects" of the Project. For the same reasons the Draft EA fails to take a hard look at the Project's environmental impacts, the Preliminary FONSI fails to adequately characterize those impacts or their "degree." • The Forest did not determine that all laws, regulations, and policies will be met when preparing the FONSI.	• The effects analysis and environmental review process were conducted in accordance with law, regulation, and policy. Implementation of Forest Plan direction, best management practices, and several project-specific design elements would minimize effects that support a finding a no significant impact. • No member of the interdisciplinary team identified a measurable effect that rose to the level of "significance" to the responsible official. No effects have been identified by the interdisciplinary team to occur outside the project area due to proposed activities, other than scenery. For scenery, the analysis area included viewpoints with a view of the project area, which made the scenery analysis area larger than the project area. However, effects are still considered to be localized and not measurable at a regional or larger scale (40 CFR 1501.3(b)(1)(2020)). Resource effects descriptions in the FONSI describe the affected area and duration of effects. The affected environment is described on pages 19 and 35 of the EA and FONSI and will be revisited for final EA preparation. • Establishing the context of the project area in relation to the forest is not at odds with NEPA regulations. The effects of project specific activities would be minimized due to the implementation of Forest Plan Direction, Best Management Practices, and Project-Specific Design Elements. The WMNF has a consistent track record in keeping effects minimal, localized, and short-term by implementing these measures. This consistency is documented in the monitoring reports publicly available at https://www.fs.usda.gov/r09/whitemountain/planning. • 40 CFR 1508.27 was rescinded when Title 40 of the Code of Federal Regulations was updated on September 14, 2020. Sections 1500-1508 of Title 40 have since been rescinded, there is currently no law or regulation to determine how a Forest Service responsible official is to reach a Finding Of No Significant Impact. The Interim Final Rule published By the Council on

Resource/Topic	Summary of Comments[1]	Response Summary
		Environmental Quality recommends that federal agencies use the updated 2020 Title 40 regulations to document a Finding Of No Significant Impact, which is what was done for the Lost River IRP. • The project FONSI considers Both short- and long-term effects; Both beneficial and adverse effects; Effects on public health and safety; Effects that would violate Federal, State, Tribal, or local law protecting the environment as part of the analysis of the degree of effect. Rationale for the FONSI determination is detailed on page 29 of the Draft EA/Preliminary FONSI. The environmental impacts and the degree of project effects were analyzed by the interdisciplinary team and are documented on pages 22-33 of the EA, in the Biological Evaluation, and in Specialists Reports for Scenery, Soils, Carbon, Recreation, Socioeconomics, and Non-Native Invasive Species, and a fuels and fire modeling report. • USFS units must comply with all laws and current regulations and policies when they are published. The changes to the NEPA regulations and how they affected the project are documented on pages 4 and 29 of the Draft EA and preliminary FONSI respectively.
NEPA Law/Regulation/Policy	• Effects of proposed activities will be significant for nearly every resource and the Forest needs to prepare an Environmental Impact Statement to be in compliance with NEPA law. • The Forest has not taken the required "hard look" for nearly every resource. • The Forest must consider and incorporate best available science into its proposed action and effects analysis. Several peer-reviewed articles have been submitted by the public for consideration. • The National Forest Management Act requires that projects on National Forest lands "shall be consistent with the land management plans." The Forest Plan contains goals, standards, and guidelines for various MA's, including MA 2.1 where Project activities will occur. While the Forest Plan includes specific goals for lands in MA 2.1, for many resource types, it states that "[f]orest-wide standards and guidelines apply." The Forest Service must demonstrate compliance with these forest-wide standards and guidelines in its plans for the Lost River IRP; in the case of guidelines or other Forest Plan management directions, any deviations must be supported by reasoned, well- supported analysis. The Forest Service must ensure that all Project activities are designed to follow the Forest Plan, and yet the Draft EA indicates that, in important respects, the Service has not supported its claims of compliance, in violation of NFMA.	• Determining significance under NEPA is up to the responsible official based on the information provided by the effects analysis conducted by the interdisciplinary team. The responsible official has not identified a significant effect that would warrant the preparation of an EIS. • The contents of the project record, specialist reports of which are all available on the project website, and the environmental assessment establishes that a hard look was taken at the potential effects to the human environment due to proposed project activities. • Consideration of submitted literature can be found below and in the Lost River Scoping Comment Summary Report. • Any deviations from the Forest Plan have been well documented in the Draft EA and resource specialist reports. The one deviation from the Forest Plan that is occurring due to project activities is Scenery guideline G-3 for MA 2.1 land (Forest Plan, p. 3-6) which is documented on page 26 of the Draft EA. Verification of Forest Plan consistency is laid out by resource on page 18 of the Draft EA. • Project comments are suggested to be project specific to give the commenter standing to object during the administrative review process. See 36 CFR 218.25(3)(iii) and 218.2 on requirement of "specific written comments" to be eligible to object during administrative review. • The U.S. Forest Service strives to improve efficiency to best serve the American public. The White Mountain National Forest does not make efforts to improve efficiency at the expense of Forest health or the environment. The primary goal of the Lost River project is to increase age-class and wildlife habitat diversity, using commercial timber harvesting as a tool to accomplish that goal while providing the economy with a sustainable yield of high-quality wood products as a secondary goal supported by the National Forest Management Act of 1976.

Resource/Topic	Summary of Comments[1]	Response Summary
	• Commenter intends to incorporate past project objections in support of their comment and to support any legal action taken against the Forest Service on the Lost River project. • The USFS is being pushed to streamline the environmental review process and minimize ecological concerns to maximize National Forest timber output. • Project is part of the new administration's effort to increase logging across the country, with no science-based data to support it. • The Forest did not explain the connected effects of the Eversource X-178 Transmission Line Rebuild Project to the Lost River Project. • The Draft EA is brief, unsubstantiated, with often no citations to support its claims. • In the Forest Plan, the Forest Service asserted that "[p]ublic participation will be an important part of the process we use for making site-specific management decisions." With scant evidence that public participation provided any meaningful direction to the Project, and evidence of impediment to public participation discussed elsewhere in this comment, the Project reflects an abdication of this commitment. • Public comment periods do not lead to substantial changes to management proposals and are disingenuous to the commenting public. • In addition to a more in depth EA, the forest should offer more public engagement events to collect more public feedback. • The Forest did not make project documents readily available to the public. • The Forest did not analyze a range of reasonable alternatives which is a violation of NEPA. • The Draft EA offers no alternatives besides a "no-action" alternative, with a cursory explanation void of citations of what will happen if the project does not move forward. • Moreover, in conflict with the Forest Plan's guidelines, the Project proposes extensive even-aged management in mature stands within the Project area, 76% of which is classified as Mature. Uneven-aged harvest methods may be appropriate in mature forests in some circumstances, but the Plan does not endorse any even-aged management: "Depending on site conditions, thinning and uneven-aged harvest methods can be used in this habitat without negatively impacting habitat quality. Some uneven-aged harvest may enhance vegetative and structural diversity."	• The Lost River IRP was proposed to meet the goals and objectives laid out in the WMNF Land Management Plan mandated by the National Forest Management Act, and was proposed before the new administration's term began. • There are no connected actions between the Eversource X-178 project and the Lost River project, the two projects are not related. The two projects do overlap spatially and the Eversource X178-2 project has been identified as a reasonably foreseeable action, determination of cumulative effects between both projects will be analyzed and documented in the Final EA. • The Lost River Project Draft EA was prepared in accordance with 36 CFR 220.7, and provided the responsible official with the information needed to determine whether to prepare a Finding of No Significant Impact or an Environmental Impact Statement. Several documents were prepared and cited in support of the Draft EA, were listed as references in the Draft EA, and were all made publicly available alongside the Draft EA on the project website prior to the start of the formal 30-day comment period. Specialist reports published as part of the effects analysis documentation each have their own references used and listed. • Public participation has been an important part of the process for the Lost River IRP. The Pemigewasset Ranger District has held two comment periods, two public engagement events, and multiple visits to local town select boards providing project information and requesting feedback. "Public participation" does not equate to a guaranteed change to the project scope or scale based on public engagement, however the line officer may modify the project scope or scale based on consideration of public feedback. Changes to the EA from Draft to Final based on public feedback and internal review will be noted in the Final EA. • Seeking public input through formal comment periods is mandated by federal regulation (36 CFR 218.24). Public comments submitted in a timely manner in accordance with 36 CFR 218.25 (a) must be considered by the responsible official (36 CFR 218.25 (b)(1)). Comments may be considered by approving changes to the proposed action, analyzing other alternatives, or requiring further analysis on identified issues. There is no requirement or mandate to enact changes to a proposed project based on public input. • Under 40 CFR 1501.9(d) "Agencies shall hold or sponsor public hearings, public meetings, or other opportunities for public engagement whenever appropriate or in accordance with statutory or regulatory requirements or applicable agency NEPA procedures.". 40 CFR Chapter V, Subchapter A has since been rescinded, however it was active during most of the effects analysis and public engagement process of the Lost River project. 40 CFR 1501.9(d) did not specify the amount of public engagement events that must be held by an agency, it stated that agencies shall hold or sponsor public hearings, public meetings, or other opportunities for public engagement whenever appropriate. The number and type of public engagement events are at the discretion of the responsible official. During proposal development and upon release of the Draft EA, the

Resource/Topic	Summary of Comments[1]	Response Summary
	Despite this instruction to avoid even-aged management in mature forest habitat, the Project proposes extensive even-aged management. Notwithstanding numerous indications that even-aged management will have the most adverse environmental impacts of the Project's various silvicultural treatments, the Draft EA never analyzes this conflict. Contrary to the Forest Plan, proposed management activities within the Project area will degrade habitat quality. • In addition to the alternatives suggested during the scoping period, an additional alternative "no even-aged management occur in mature stands, consistent with Forest Plan direction to prioritize only uneven-aged management in those areas of the Forest." was requested for consideration. • Additional alternative was suggested outside of a formal comment period to "prohibit harvesting trees greater than 3 inches in diameter in the Project area to protect NLEB habitat."	responsible official held two public open house events and two public comment periods. This is beyond what is required by 36 CFR 218.24 (a)(1) ""The responsible official shall provide legal notice of the opportunity to comment on a proposed project or activity implementing a land management plan"". The Pemigewasset Ranger District held two public events for the Lost River project: one in May 2023 to gather feedback from the public about the area and to hear ideas or suggestion about what the public would or would not like to see, and one in April 2025 to provide information on the Draft EA, receive feedback, and inform the public on how to submit a comment. Holding any further public engagement events on the Lost River project will be considered by the responsible official. Members of the public may provide comment on a project at any time, however only timely submitted comments may provide eligibility to file an objection in accordance with 36 CFR 218.5(a)." • All supporting analysis reports and literature documents were published to the project website concurrently with the Draft EA. They became immediately available to the public when the notice of availability was sent to the mailing list. Any other documents are readily available to the public via a Freedom of Information Act request, if not deemed deliberative. • The comment references 42 U.S.C. § 4332, section C, which is only relevant to the preparation of an EIS. Under 36 CFR 220.7 (b)(2), the responsible official is not required to accept any specific number of alternatives for analysis under an EA. Based on this a "reasonable range of alternatives" may just be the proposed action. The responsible official did approve an action alternative to the Elbow Pond Road relocation, as well as considered several alternatives suggested by the public, one of which was addressed in the action alternative. These considerations are documented in the Draft EA (pp. 16-17). A no-action alternative is not required for an EA-level analysis, but may be included as an option by the responsible official (36 CFR 220.7 (b)(2)(ii)). 40 CFR 1502 addresses requirements for the preparation of an EIS and are not relevant to environmental assessments. • Correction to the commenters, the Lost River IRP does not include a No-Action alternative, there is consideration of no action documented in the Draft EA. In an EA level analysis, no set number of alternatives is required or prescribed (36 CFR 220.7 (b)(2)). A No-Action alternative may be included at the discretion of the responsible official (36 CFR 220.7 (b)(2)(ii)). The timber prescriptions were prepared by a certified Forest Service Silviculturist who determined the proposed action to be the best way to move towards Forest Plan goals and objectives for the Elbow Pond and Franconia Notch Habitat Management Units. The FEIS Vegetation Section (Forest Plan FEIS, pp. 3-91 to 3-94) details the explanation for what would happen if no action were to occur. In the Northeast, small partial disturbances occur regularly, and large stand-replacing disturbances occur at much longer intervals (Lorimer and White 2003). Since aspen/birch and oak/pine habitats are dependent on intense disturbance to maintain, without

Resource/Topic	Summary of Comments[1]	Response Summary
		management or large-scale natural disturbance, these habitat types would convert to other broad habitat types, determined by ecological land type (ELT). These broad forest habitats would continue to age into mature and old age classes. The culmination of these three points makes it appropriate to conclude that without management or large-scale disturbance, the landscape would trend toward a homogeneous structure and species mix dominated by shade tolerant and longer-lived species. The timber prescriptions were prepared by a certified Forest Service Silviculturist who determined the proposed action to be the best way to move towards Forest Plan goals and objectives for the Elbow Pond and Franconia Notch Habitat Management Units, laid out in the HMU Rationale documents (Elbow Pond HMU Rationale, pp. 5-7) (Franconia Notch HMU Rationale, pp. 5-7). • The "endorsement" the comment is referring to is the definition of Mature Forest Habitat in the Forest Plan Glossary. The definition describes management options for a mature stand that would remain a mature stand, it does not "instruct to avoid even-age management in mature forest habitat". The definition for "Even-Age Management" is also in the Forest Plan Glossary, as is the definition of "Regeneration Forest Habitat" which endorses the use of even-age management consistent with the comment's rationale. Chapter one of the Forest Plan sets goals and objectives for management of the White Mountain National Forest. The Forest Plan does not prohibit even-aged management in mature stands, or prohibit conversion of mature stands to regeneration stands. On the contrary, Forest Plan goals are clear in chapter one for Vegetation Management "The White Mountain National Forest will manage vegetation using an ecological approach to provide both healthy ecosystems and a sustainable yield of high quality forest products, with special emphasis on sawtimber and veneer.". This does not prohibit but encourages even-age management in mature stands where appropriate. There is no conflict as this comment implies. One of the project objectives is to "increase age-class diversity and foster the regeneration of stands", which is typically accomplished through the use of even-aged harvest methods. Even-aged harvest methods are not prohibited in mature stands and is the primary method of converting to regeneration age. If a stand is converted, the stand is not considered degraded mature habitat, it is considered regeneration forest habitat. Stand age class data is available in the HMU conditions documents in the project record. • There is no Forest Plan direction to not conduct even-age management in mature forest habitat. Forest Plan goals and objectives include age-class and wildlife habitat diversity, which this project supports. Consideration was documented for the alternatives requested for consideration during scoping. The suggested alternative does not meet the project purpose and need and thus will not be considered for analysis in the EA. • This alternative was suggested to the Forest outside of a formal comment period, which does not make the comment attached to the alternative eligible for the forthcoming objection period. The suggested alternative does

Resource/Topic	Summary of Comments[1]	Response Summary
		not meet the project purpose and need and thus will not be considered for analysis in the EA. Eliminating all trees over 3 inches diameter from proposed timber harvesting would not increase wildlife habitat and age-class diversity, and would not provide the community with high-quality wood products, all goals and objectives in the Forest Plan. Effects to NLEB were analyzed by the district wildlife biologist and consultation with USFWS was conducted in accordance with the Endangered Species Act. Any reasonable and prudent measures and terms and conditions listed in the Biological Opinion will be adhered to.
Purpose and Need	• The Forest Service here heavily relies on the Forest Plan's objectives for defining the Project's purpose and need. Yet some components of the Forest Plan (e.g., stand age and habitat type objectives) are both arbitrary and based on erroneous, out-of-date information. Under the circumstances, that means the agency is either not comprehensively utilizing the best and most current science in its planning processes or it is using updated scientific information in the form of non-peer-reviewed "white papers" or guidelines, none of which have been subjected to transparent, public review. Indeed, the Project record here is replete with WMNF-wide "supporting documents" that have never been issued for public comment and that purport to elaborate on Forest Plan requirements in ways that the Forest Plan never decided. • Given the decades of science on forest health and ecology since the Forest Plan, the Forest Service's reliance on the Forest Plan here inappropriately narrows the scope of forest management activities and prevents the Service from accurately considering reasonable alternatives. To comply with NEPA, NFMA, the Forest Plan, and the Service's own Handbook, the Forest Service must prepare a properly informed and rationally supported Purpose and Need Statement for this Project that takes current scientific understandings of forest ecology into account. • The Purpose And Need Statement Failed to Consider and Incorporate the Best and Most Current Scientific Understanding of the Benefits of Retaining Mature Forests for Both Carbon Storage and Forest Ecosystem Health. • The Forest Plan's age class goals are well outside the natural range of variability, and fail to consider basic ecological information about the WMNF. Despite acknowledging the small patches and relative scarcity of regeneration age forest (especially aspen-birch) that would naturally occur, as well as the unnatural abundance of regeneration age forest that existed across the Forest Plan analysis area and presumably still exists today, the Forest	• As with all work done to manage the White Mountain National Forest, Forest Service staff planned the Lost River to meet Forest Plan goals and objectives. The stand-age and wildlife habitat white papers are condensed documents that provide methodologies and broad analysis for specific resources based on peer-reviewed science and federal regulations. Forest Service white papers published alongside and referenced in the Lost River Draft EA are not subject to NEPA and public notice and comment. • Best available science still supports Forest Plan goals and objectives. WMNF monitoring consistently verifies vegetation management projects are meeting Forest Plan goals and objectives while minimizing effects to the human environment. The purpose and need for the Lost River project is consistent with Forest Plan Goals and objectives, and clearly lays out existing versus desired future conditions for the project area. The purpose and need allows for the development of reasonable alternatives, multiple suggested by the public were considered, and one included in the effects analysis. The HMU rationale documents support the purpose and need statement. No reasonable alternatives to the current timber prescriptions were suggested by the public. A general "do not harvest in mature or old stands" was suggested, this alternative would not meet the purpose and need of the project and therefore was determined to not be a reasonable alternative. The current timber prescriptions were determined by the district silviculturist to best meet the Forest Plan goals and objectives for the area. Since any modification to the current timber prescriptions would be less successful in meeting Forest Plan goals and objectives, there is no need to propose multiple variations of timber prescriptions for the Lost River IRP. • Consideration of scientific literature submitted can be found below and in the Lost River Scoping Comment Summary Report. Only about 3% of the combined acreage of the Elbow Pond and Franconia Notch HMUs would be harvested under the proposed treatments (1093 of 35680), which is consistent with the literature submitted. The majority of mature forest would remain after implementation is complete. • No explanation or example is given on what is meant by "natural range of variability". Treatments would create conditions similar to what occurs after a natural disturbance such as a storm or wind event. Table 1 in both the Elbow Pond and Franconia Notch HMU rationale documents define how much regeneration age forest exists as the current condition. Collectively, there are 13 acres of permanent wildlife openings and "other" habitat type,

Resource/Topic	Summary of Comments[1]	Response Summary
	Plan and Draft EA suggest that significantly more regeneration age and young forest must be created. The Draft EA offers no analysis of how much regeneration age forest exists within the Forest Plan analysis area today, nor how much exists within the relevant HMUs as a whole. • "The Habitat Management Rationale documents for the Project include no information on the amount of “old age class” forest in the HMUs. Without that information, it is impossible to determine whether the Project supports the Forest Plan age-class objectives."	which accounts for non-forested conditions such as wetlands, rock, alpine habitat, etc. The two HMU's combine to be 35,680 acres in size. The project proposes as much as 237 acres of early successional habitat, which is less than 1% of the combined HMU acreage. The Lost River IRP is consistent with Forest Plan goals and objectives. • The Forest Plan does not contain any objectives for an old age class. Land unsuitable for harvest is considered a proxy for the old age class because it is not available for timber harvest and so should continue aging for the long-term (Forest Plan, p. 1-21). This information is also included on p. 7 in both HMU documents, and objectives for unsuitable lands are included in Table 5. The words "old age class" were removed from the Forest Plan and replaced with the wording "Land Unsuitable for Harvest" in an administrative correction due to causing confusion along these same lines (WMNF Administrative Correction 2, 2009).

Summary of Literature Submitted

Table 2. Summary of submitted scientific literature received. Submitted scientific articles are filed in the project record.

Article Title and Authors	Summary of Article	Consideration Summary
Dellasala et. al. (2025). Measuring forest degradation via ecological-integrity indicators at multiple spatial scales. Biological Conservation, 302	The article is purported to as a scientific study that recognizes the importance of older forests and associated attributes.	The article is global in nature, no data was actually used for the research described in the article and it is not a scientific study as Standing Trees used it,, but rather pushing a framework. The objective of the article is to "provide a comprehensive framework to assess forest degradation based on tracking losses to ecosystem integrity as imposed by anthropogenic disturbances, ranging from the removal of individual large, old trees to stand and landscape alterations.". The article provides five global examples of using the framework, but none have relevance to the WMNF. There is a quick example of northeastern forests on page four, but little context is provided to support the conclusion.
Markuljaková et. al. (2024). Rewilding beech-dominated temperate forest ecosystems: effects on carbon stocks and biodiversity indicators. iForest: Biogeosciences and Forestry	The article is based on European Beech (Fagus sylvatica) forests, with data collection in the Slovakian Carpathian Mountains with a purpose of emphasizing substantial carbon storage potential in these forests and the importance of "management cessation" for carbon stock and biodiversity conservation.	At no point is American beech (Fagus americana) mentioned. No tree species found in the Lost River IRP project area is listed in the Supplementary Material (biomass calculations, wood density, decomposition, etc.). More importantly, at no point is beech bark disease or beech leaf disease mentioned, which are two significant lethal stressors to American beech that have strong impacts on the ability to sequester carbon (stressors slow growth) and store carbon. This article has no relevance to the Lost River IRP.
Brown et. al. (2023). Net carbon sequestration implications of intensified timber harvest in Northeastern U.S. forests. Ecosphere	Article analyzes how emissions, carbon sequestration. And carbon storage correlate to timber harvesting intensity.	Brown et. al. (2023) analyzes two broad questions: (1) What are the effects of harvest intensification on forest and wood product carbon pools? and (2) What are the effects of harvest intensification on net forest carbon sequestration? The analyses compare five harvest scenarios – no harvest, current harvest regime (Business-As-Usual, BAU), 50% increase in harvest intensity, 75% increase in harvest frequency, and 50% increase in intensity with 100% increase in harvest frequency. Results of the study indicate increasing the intensity of timber harvest reduced net carbon sequestration relative to current harvest regimes. The project proposes to provide wood products and carbon benefits, while also increasing structural, compositional, and age class diversity. The project is not intended to maximize carbon sequestration or storage. Additionally, the project proposes neither an increase in harvest intensity nor an increase in harvest frequency. The project proposal is consistent with Forest Plan harvest goals and objectives of harvest intensity and frequency and most closely matches the BAU harvest scenario

		analyzed and therefore does not reduce net carbon sequestration relative to current harvest regimes on the WMNF.
Birdsey et. al. (2023). Middle-aged forests in the Eastern U.S. have significant climate mitigation potential. Forest Ecology and Management, 548	Article is an assessment on how carbon stocks at regional scales and in individual national forests are affected by factors such as timber harvesting, natural disturbances, climate variability, increasing atmospheric carbon dioxide concentrations, and nitrogen deposition.	A project level carbon analysis was conducted. Project focus was not only on how we can maximize carbon benefits but how carbon benefits can be provided and achieve other project desired results while considering climate mitigation potential. The planned actions aim to enhance compositional and structural diversity within the project area consistent with objectives of the forest plan and will increase species and habitat diversity, which will improve the ability of the ecosystems within the project area to respond to changing climate trends and stressors. The article mentions that the data does not account for offsite carbon storage in the form of wood products, which the Lost River project would provide.
Jong et. al. (2023). Increases in extreme precipitation over the Northeast United States using high-resolution climate model simulations. Climate and Atmospheric Science, 18	Article uses modeling to predict an increase in extreme precipitation events which may be six times more likely by 2100 than the early 21st century.	A Climate Adaptation Workbook was conducted for this project that included the entire interdisciplinary team. Climate adaptation is adjustment of systems in preparation or in response to climate change. Adaption actions are designed to intentionally address climate change impacts and vulnerabilities in order to meet goals and objectives. Climate change was considered during project development. Project hydrologist determined that proposed activities as part of Lost River would not exacerbate water quantity issues caused by extreme precipitation events.
Peng et. al. (2023). The carbon costs of global wood harvests. Nature, 620 110-115	Article presents results of a new model that uses time discounting to estimate the present and future carbon costs of global wood harvests under different harvest scenarios.	The analysis is global in nature and provides no data or results for project or regional level. The Article suggests models that attribute sequestration to new harvests are inappropriate because forest growth would occur regardless of new harvests and typically results from agricultural abandonment, recovery from previous harvests and climate change. Article suggests that some carbon estimations count gross emissions annually, which assigns no value to the capacity of newly harvested forests to regrow and approach the carbon stocks of unharvested forests. The Lost River Project Carbon estimates are based on ForCaMF model results, which does take into consideration the capacity of newly harvested forests to regrow and incorporate short-term reductions in stand growth rate following harvest. Furthermore, the method used in Lost River may overestimate carbon loss per area, as it does not account for carbon storage in harvested wood products.
Hopp et. al. (2025). Maximum likelihood estimators are ineffective for acoustic detection of rare bat species. Plos One, 20(4).	Article is a study on reliability of acoustic monitoring equipment to accurately and consistently detect bats,	The Forest Service did not rely on acoustic surveys to determine the likelihood of northern long-eared bat presence. Instead, we determined the presence of the

	with a finding that the tested equipment yielded poor results and should be used with caution.	species is reasonably expected throughout the project area during the non-hibernation period given the abundance of roosting and foraging habitat. The referenced article recommends conducting manual review of acoustic files to determine species presence. This is what the Forest Service typically does (either internally or through a third-party contractor) when analyzing the acoustic data it collects (e.g., data collected for the North American Bat Monitoring Program). The "limited surveys" mentioned in the BE were performed by an independent researcher. The results shared to the Forest Service relied on software to determine the likelihood of species presence. Although no northern long-eared bats were detected, the Forest Service did not treat this as the likelihood of absence. This was made clear in the BE (p.11): "Although [no northern long-eared bats] were observed during a more recent (though limited) survey effort (ter Hofstede 2021), the continued presence of the NLEB is reasonably expected."
Giles (2025). Snowshoe hares have a camouflage problem. These scientists want to help. Vermont Public Radio Interview	Story by Vermont Public Radio on warmer winters due to climate change affecting snowshoe hare ability to blend into their surroundings.	The article referenced by the commenter does not mention lynx, although it is focused on its prey base (snowshoe hare). According to the article, while snowshoe hare do require early successional habitat, large clearcuts like those common on industrial forests in New England may not be beneficial to the snowshoe hare because they don't accumulate much snow. Instead, smaller harvests within otherwise forested areas are better for hare, since they provide foraging opportunities while allowing for the accumulation of snow. The proposed project more resembles this approach to vegetation management than the large clearcuts on industrial forests.
FB Environmental Associates et. al. (2021). A Regulatory, Environmental, and Economic Analysis of Water Supply Protection in Auburn, Maine. City of Auburn Report	Article describes a thorough analysis of impacts to the Auburn Lake and its watershed located in Auburn, ME. Multiple recommendations are made related to timber harvest and preserving water quality of Auburn Lake. Buffers are discussed and suggested to increase size from 50 ft to 75-100 ft.	In the Forest Plan, a 25 ft no-cut buffer is applied to perennial streams and lakes and an additional 75 ft limited harvest buffer is applied, thus giving all perennials and lakes a 100 ft riparian management zone. Potential risks to water quality as related to timber harvest are put forth including increases in water yield, sediment delivery to streams, and hydraulic fluid contamination of streams, issues which are all addressed by NH and ME state BMPs. Also mentioned is the enforcement of BMPs and written and photographed assessment of BMP efficacy. Every year the Forest monitors a random selection of projects for BMP implementation and submits written document and photographs to the Forest Service Region 9 office for their review. Article also mentions the need for creating an inventory of all critical streams, wetlands,

		vernal pools, etc. throughout the Auburn Lake watershed. This is a goal that is constantly being worked on by multiple resource specialists throughout the WMNF for project areas. In summation, many valid points and ideas are addressed by the report. However, a report of this thoroughness is not feasible for every project occurring on the WMNF due to the amount of area that is covered and the availability of resource specialists. Instead, the Forest relies on its Forest Plan and state BMPs to protect water resources.