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Organization: RESTORE: The North Woods

Title:

Comments: These comments are submitted on behalf RESTORE: The North Woods, a nonprofit organization with members in New Hampshire, Maine, and across New England. This project proposes hundreds of acres of logging and burning in the beautiful and biologically diverse Sandwich Range. This includes areas along popular trails that go into the Sandwich Range Wilderness and Mt. Chocorua Scenic Area.

We are adamantly opposed to this unnecessary and damaging logging and burning project. Despite claims by the Forest Service, New England oak-pine forests are not fire-dependent. Fire was very rare in the forests of the region before European settlement. Claims that these species require fire for regeneration are not supported by any credible evidence. In reality, these logging and fire treatments will create an artificial habitat, not restore a natural habitat.

Moreover, it is unnecessary to clear forests to create early-successional habitats. There is more such habitat today than there was before European settlement. None of the species that would benefit from this forest-clearing are imperiled and most are common across their range. On the other hand, many species, including the endangered Northern Long-eared Bat, need mature and old-growth forests - which this project would fragment and liquidate.

Logging for timber stand improvement and timber production is unnecessary. There is ample available timber for the industry on private lands outside the national forest. Moreover logging on the White Mountain National Forest is subsidized by the American taxpayer and competes unfairly with private timberland owners.

Aside from being unnecessary, this project will be harmful to the White Mountain ecosystem. The project targets logging in mature forests, which conflicts with the goal of Executive Order 14072 to "conserve mature forests." The project would also log forest habitats that are likely to be home to endangered species, such as the Northern Long-eared Bat, while not providing habitat for any imperiled species.

Attachment: I am attaching a peer-reviewed paper which directly challenges the claims by the Forest Service that this kind of logging and burning project is necessary and beneficial. The paper is:

Kellett, Michael J., Maloof, Joan E., Masino, Susan A., Frelich, Lee E., Faison, Edward K., Brosi, Sunshine L., and Foster, David R. (2023). Forest-clearing to create early-successional habitats: Questionable benefits, significant costs. *Front. For. Glob. Change*. doi: 10.3389/ffgc.2022.1073677 URL: <https://www.frontiersin.org/articles/10.3389/ffgc.2022.1073677/full>

RESTORE urges the Forest Service to cancel this unnecessary and harmful project and allow this recovering forest to continue growing to reach its maximum ecological potential - termed proforestation. This will help to mitigate climate change, protect native biodiversity, and provide numerous benefits to people, including clean air and water, intact soils, and recreation in a natural and unspoiled setting.

Thank you for the opportunity to comment.