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Comments: Thank you for accepting these comments regarding the White Mountain National Forest's proposed Tarleton Integrated Resource Project. As you know, the Society for the Protection of New Hampshire Forests is a 121 year-old land trust and forestry organization whose mission is to perpetuate the forests of New Hampshire through their wise use and their complete reservation in places of special scenic beauty. We were formed by a group of citizens concerned with the rapid and poorly planned timber harvesting occurring in the White Mountains in the late 19th Century and early 20th Century. Since the establishment of the White Mountain National Forest, we have considered the U.S. Forest Service to be a key partner in the protection and management of the forest resources in this state. As such, we have engaged with the agency in the development of past forest plans dating back to original passage of the National Forest Management Act in 1976, including the current WMNF Land and Resource Management Plan (WMNF Plan). The Forest Service's responsibility to steward the White Mountain National Forest for multiple purposes and uses is similar to that of the Forest Society as we manage our reservations. Forest products, outdoor recreation, opportunities for public education and the protection of water and soil resources are some of the many benefits all of us receive from the forests in New Hampshire including those in the White Mountains. The current WMNF Plan details these multiple goals and objectives the Forest Service must balance. The 2005 Forest Plan was the product of several years of public engagement, ultimately resulting in a consensus plan that balanced many interests and perspectives, and was implemented without legal challenge. As the Lake Tarleton addition to the WMNF was acquired in 2000, this plan fully incorporated and considered the future management of these lands that comprise the Lake Tarleton integrated resource project area. When reviewing or considering timber management activities, it is important to be mindful of the Intergovernmental Panel on Climate Change Special Report on Climate Change which states: "Sustainable forest management can prevent deforestation, maintain and enhance carbon sinks and can contribute towards GHG emissions-reduction goals. Sustainable forest management generates socio-economic benefits, and provides fibre, timber and biomass to meet society's growing needs." The Society for the Protection of New Hampshire Forests concurs with the IPCC statement and believes sustainable forest management can help all landowners, both public and private, reach the long-term outcomes the IPCC describes. In addition, this approach will also help create diverse wildlife habitats, maintain plant biodiversity and promote recreational opportunities. As stated in the WMNF Plan, the purpose of the Management Area where the proposed activities will occur is "to provide a sustained yield of high-quality of timber products, provide a balanced mix of habitats for wildlife, provide a variety ofrecreation opportunities, and manage high-use or highly developed recreation areas to acceptable social and ecological standards." We recognize executing that purpose and achieving the goal of a diverse, resilient forest that provides those benefits requires a careful planning process. After reviewing the US Forest Service's Draft Environmental Assessment (EA) and related documents, we believe the agency has engaged in a thorough process. Therefore, we conclude the proposed Tarleton Integrated Resource Project will result in benefits to the natural resources found within the Tarleton Habitat Management Unit. We would like to highlight several important points in the EA and supporting documents. First, given the relationship between forests and climate change, the planning for a harvest should acknowledge the effects it may have on carbon sequestration and storage. The Forest Carbon Assessment for the White Mountain National Forest does that. It notes that the forestry sect9r's contribution to GHG emissions has declined over the last decade (page 1 of the Forest Carbon Assessment). Second, it also stresses (page 1) that the largest source of global GHG emissions in the forestry sector is deforestation, which is defined as the removal of all trees to convert forested land to other land uses that either do not support trees or allow trees to regrow for an indefinite period. The Tarleton project does not fall under that definition. Third, the Forest Carbon Assessment states that "national forests tend to experience low rates of land-use change, and thus, forest land area is not expected to change substantially within the WMNF in the future. Therefore, on national forest lands, the projected carbon trends may closely resemble the "net sequestration" trend in Fig. 11, page 18 of the Forest Carbon Assessment. Fourth, the WMNF's goals for age class and trees species diversity are what drives wildlife diversity. This approach is critically important in

providing habitat for all species and in providing critical places for those rare and declining species. Finally, the WMNF is of course one of the most important public recreation destinations in the Northeastern United States. The proposed boat launch and access site upgrades on Lake Katherine will improve the visitor experience there. Moreover, the 500 foot buffer between the Appalachian Trail and the harvest area coupled with the conducting the harvest in the winter will reduce the noise impacts to A.T. users.

In order to strengthen the plan, we would suggest the USPS include the following additional steps. First, buffer the identified vernal pools as you lay out the harvests. Second, to facilitate improved transparency and communication, post silvicultural interpretive signs at the points where recreation activities and harvesting may intersect. In closing, the Forest Society recognizes a timber harvest often creates a quick, drastic change to the landscape that can seem arbitrary or thoughtless to some. We appreciate the Forest Service's decision to re-open the c01mnent period and its responsiveness to earlier concerns about the project. The changes the agency has made in the second EA, such as the 100-foot no-cut buffer to Lake Tarleton and the 100-foot protection buffer for white pine along Lake Katherine to preserve potential bald eagle nesting habitat, are improvements to the plan. We understand the Forest Service must manage National Forests for multiple purposes and stakeholders and so we appreciate the agency's willingness to consider the comments you have received from all these stakeholders. The Forest Society advocated for the Forest Service's acquisition in 2000 of the Lake Tarleton property with the understanding that a portion of these lands would be actively managed, as is now being proposed. We believe the Tarleton Integrated Resource Project appropriately balances the many uses that define a National Forest, adheres to the WMNF Plan and in the long[shy]tenn will result in a more resilient, diverse forest.