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Title: Co-Director
Comments: To the Pemigewasset Ranger District of the White Mountain National Forest,

While I have tremendous respect for all of the individuals who have been working on this project, I firmly believe that the Tarleton Integrated Resource Project is ill-conceived; that this project will irrevocably mar Lake Tarleton and the surrounding forest, reducing the awe and majesty this area currently provides; that this project undermines the wishes, promises, and efforts made by countless private and public figures who came together to preserve this land; that this project imperils the health and water quality of Lake Tarleton, the largest lake in the White Mountains; and that this EA presents a false dichotomy, where either all elements of the project are seen as necessary and proper, or none.

As someone who has grown up on the shores of Lake Tarleton, I know there is something uniquely powerful about this place. It's not just that the far shoreline is almost completely undeveloped, though I know how rare and spectacular that is. And it's not just the commanding view of Mount Moosilauke and how its coloring differs from the nearer hills and mountains, though I never grow tired of the changing hues of the mountains. The power of this vista is its totality and wholeness - from the pristine waters of the largest lake in the White Mountains to the looming summit of the tallest mountain in the region - which has somehow escaped the fate that has befallen so many other places, where mankind's imprint and presence is visible everywhere. From the shores of lake Tarleton looking east, all one can see is unbroken wilderness and natural beauty.

This special place and this iconic view have dramatically shaped my life. It is my happy place, my shelter from the storm. This is the origin of my love of nature and the outdoors, where I first felt connected to the land in a personal and powerful way. And I am not alone - every summer hundreds of Kingswood campers and staff call the shores of Lake Tarleton their home. Part of our mission is to help our community "treasure the natural world." Part of the culture of our camp is to acknowledge the beauty of our surroundings, so that everyone is aware of the majesty of our surroundings. Soon enough, most campers - on their own - are taking stock of the pristine spaces and moments that make up a Kingswood summer. It is the grandeur of the space - and the peace and serenity found in a wilderness setting - that makes pre-teens and teenagers choose to spend their free time soaking up the beauty of their surroundings, perhaps on a sunset paddle, or a quiet spot on an east-facing porch, or lost in thought during a counsel fire.

The fact that the Tarleton HMU - land that stretches from the shoreline of the largest lake in the White Mountains to 800 vertical feet above the shore, nearly all of which is part of the Tarleton watershed - is designated as MA 2.1 (General Forest Management) is a monumental mistake that must be remedied immediately. The primary purpose of lands with a MA 2.1 designation is "to provide a sustained yield of high-quality timber products." Why on Earth would this unique section of forest be best suited for that purpose?!

The scope and design of the Tarleton Integrated Resource Project assumes that this land is appropriately categorized, and as such, that this land should receive "treatments" that will result in logging on 900 acres and the removal of 5 million board feet of timber. But these "treatments" will irrevocably alter the landscape - transforming this pristine landscape into a "mixed use" area. Furthermore, while this project implies that the visual impact will be brief, only when the cleared areas are in their early successional period, this is false. This is not a one-time operation; instead, it is the beginning of a perpetual cycle in which the forest service selected loggers will return every 20 years to clear another section of the Tarleton HMU - whichever section of forest has the greatest potential timber harvest. And while the Forest Service went to great lengths to choose sections of

forest that would not dramatically affect the viewshed for this cutting, by selecting those locations now, they are eliminating those areas from future cuts, which means that future logging projects will inherently be more visible and impactful to the viewshed.

Because the MA 2.1 designation for the Tarleton HMU is so ill-suited for the area, I wonder what evaluative processes were used to make that determination. In the 2005 Executive Summary Final Environmental Impact Statement for the WMNF Forest Plan, it states that "newly acquired land will be allocated to the same MA as surrounding National Forest land if it has similar attributes. If the attributes are different, the acquired tract will be evaluated by an interdisciplinary team to decide its management area. (page 5)"

I also wonder how the timing of the Tarleton HMU aligned with the updated Forest Plan. According to the 2005 Executive Summary Final Environmental Impact Statement for the WMNF Forest Plan, the public involvement process began in 1997 and concluded with the Notice of Intent (NOI), which was published in February of 2000 (page 8). But the Tarleton HMU was not a part of the WMNF at that time.

Was the Tarleton HMU evaluated by an interdisciplinary team to decide its management area when the land was acquired in 2000? Was there public input in the process? A public comment period? If so, are those documents available for review?

And if such a process was not conducted, that process - a robust review of the Tarleton HMU management area classification with public involvement - must occur before the Forest Service initiates any significant management projects within this area.

I believe that this land has been incorrectly zoned and should be re-classified as a MA 8.5 (Scenic Area), which would prohibit timber extraction, cell towers, wind turbines, and other development that would diminish the area's scenic, cultural, or natural values. Currently there are nine scenic areas in the White Mountain National Forest, but none are found west of I-93. It sure seems like Lake Tarleton, the largest lake in the WMNF, with its commanding view of Mount Moosilauke, the tallest mountain in the western WMNF, should qualify as a Scenic Area.

I also believe that this plan undermines the wishes, promises, and efforts of countless private and public figures who came together to preserve this land. Twenty-two years ago, when the Tarleton area was for sale and at risk of large-sale logging and construction, regional conservation groups, private citizens, and New Hampshire politicians came together and raised $7.5 million to purchase and protect this unique landscape. As longtime Republican U.S. Senator Judd Gregg said at the protection celebration in 2000, "Many of us here today have worked hard for a number of years to reach the point we are at today where we can proudly say that this pristine New Hampshire wilderness has been saved."

The 600 individuals who donated to this effort did not save this land to see it auctioned off to the highest bidding logger. They saved this land because the Lake Tarleton region is a uniquely beautiful and serene habitat that has miraculously escaped significant shoreline development or other major visible signs of mankind's interference with the natural world. The White Mountain National Forest should honor this vision and put in place protections to safeguard this land for perpetuity.

I also fear that this project imperils the health and water quality of Lake Tarleton, the largest lake in the White Mountains. I recognize that "the WMNF and its contractors shall implement appropriate National core and state BMPs to minimize soil loss and erosion and to protect water quality" and that "If streams or water bodies are

discovered in the project area during project planning or implementation that are not included in the National Hydrology Database) NHD or found to have a different flow regime (i.e., intermittent or perennial) than indicated by the NHD, appropriate Forest Plan Standards and guidelines for Riparian and Aquatic Habitats, National Core and State BMPs, and other project design features shall be implemented to provide the necessary resource protections."

My primary concern surrounds "intermittent or perennial streams." As someone who spends every summer on Lake Tarleton, I worry about runoff caused by strong summer storms. Several times every summer we have heavy rainstorms (1"-3" of rain in a short period of time). After these storms, the intermittent and perennial streams on the eastern side of Lake Tarleton have exceptionally high flow rates. My understanding is that these intermittent streams do not receive protections from logging - no riparian zones or limits to logging. With the soil disturbances and the loss of root systems surrounding these streams, there will be significant sedimentation near the mouths of these streams, which will affect the health and water quality of the lake.

To that end, I would like to see the Forest Service provide safeguards (e.g. riparian buffer zones) surrounding all intermittent or perennial streams found in the Lake Tarleton watershed.

I also find that this EA presents a false dichotomy, where either all elements of the Tarleton Integrated Resource Project are seen as necessary and proper, or none of them.

Under the National Environmental Policy Act (NEPA), federal agencies are required to evaluate the potential environmental impacts of a major federal action. NEPA also requires that federal agencies consider a "reasonable range" of alternatives. What is a reasonable range? The White Mountain National Forest presents the Tarleton Integrated Resource Project as an all or nothing proposition: We can either log 900 acres of publicly-owned land in one of the most scenic watersheds in New Hampshire's White Mountains AND do important restoration and maintenance work for recreation sites and cultural resources; OR we can do nothing at all.

This approach is neither reasonable nor legal. The Lake Katherine boat launch and shoreline could benefit from improvements that are proposed in the Tarleton IRP. Historic apple orchards could benefit from routine maintenance. Small tree plantations of non-native species on former state lands could be restored to more natural conditions.

And yet, none of this reasonable work is considered separately from the harmful commercial logging that is proposed across 900 acres of the Lake Tarleton watershed, jeopardizing the lake's excellent water quality and heightening the risk for sediment pollution and harmful algal blooms.

The White Mountain National Forest had an opportunity to correct this deficiency when it issued a revised Assessment in early April. Instead, they offered the same stark choice to the public. The lack of a reasonable range of alternatives paints a false choice.

Furthermore, in its efforts to promote the "treatment plans" proposed in the EA, the Forest Service overstates the benefits of commercial logging and the risks of allowing this forest to stay in its natural state.

In the section labeled "Consequences of No Action," the following words were selected to describe the state of the forest if natural successional processes continued: delay, suppress, restrict, mortality, and succumb. All of these terms have a major negative connotation.

And yet, over 50% of the land managed by the WMNF is non-motorized landscapes where timber harvests are prohibited. In describing these lands in the 2005 Executive Summary Final Environmental Impact Statement for

the WMNF Forest Plan, the Forest Service says, "These management areas provide for older forest conditions and large blocks of non-manipulated landscapes that are valued for both their ecological and social values."

So not only does the EA present a false dichotomy - either we do all of the proposed actions or none of the actions - the EA also presents a false narrative surrounding forest management practices - claiming that the forests will be imperiled without large-scale timber management. If that were true, the Forest Service would be guilty of gross negligence in its duties to be protector and steward of our national forests.

In summary, I object to the Tarleton Integrated Resource Project for the following reasons:

That this project will irrevocably mar the Tarleton HMU, reducing the awe and majesty this area currently provides;
That this project undermines the wishes, promises, and efforts made by countless private and public figures who came together to preserve this land;
That this project imperils the health and water quality of Lake Tarleton, the largest lake in the White Mountains;
And that this EA presents both a false dichotomy - where either all elements of the project are seen as necessary and proper or none - and a false narrative regarding the benefits and risks of mature forests.

Finally, I strongly believe that the Tarleton HMU should be reclassified to MA 8.5 Scenic Area.