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First name: Anon

Last name: Anon

Organization:

Title:

Comments: I am writing to express my opposition to the Lake Tarleton Integrated Resource Project as proposed in the April 2022 updated Environmental Assessment.

Twenty-two years ago, a ground swell of reaction to a planned large-scale resort development of the Lake Tarleton Forest saved it from the ax. Now, the "Lake Tarleton Integrated Resource Project" threatens, once again, to strip the trees from the land.

It is very clear what the intent of the New Hampshire Congressional Delegation, the Governor, the Non-Governmental Organizations and the 600 individual donors was in 2000 when they came together to purchase 5,300+ acres surrounding Lake Tarleton. To quote longtime Republican U.S. Senator Judd Greg 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." U.S. Representative Charlie Bass and representatives from the Trust for Public Land, the Appalachian Mountain Club, the Upper Valley Land Trust, the White Mountain National Forest and the Society for the Protection of New Hampshire Forests all echoed these sentiments. They worked tirelessly for 5 years and raised more than \$7.5 million dollars. The White Mountain National Forest's "Lake Tarleton Integrated Resource Project" threatens to violate their intent and the public's trust.

In keeping with the intent of the original land acquisition, the White Mountain National Forest should remove this and all future threats to Lake Tarleton's surrounding forest by amending the 2005 White Mountain National Forest Plan and designating a Scenic Area in the landscape surrounding spectacular Lake Tarleton, Lake Katherine, Lake Armington, and stretching along the Appalachian Trail corridor north to Webster Slide, and Wachipauka Pond. This contiguous landscape is among the most scenic in the Granite State. And yet, the White Mountain National Forest has failed to designate any Scenic Areas west of I-93. For the benefit of the local tourism and recreation economy, and for the integrity of this treasured landscape, including Abenaki and early colonial historical resources, it's past time to permanently remove the threat of logging and development by amending the White Mountain National Forest management plan and designating a Scenic Area.

There are many faults with the updated Environmental Assessment. These include:

- No Reasonable Alternatives Offered

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. The White Mountain National Forest presents the Tarleton Integrated Resource Project as an all or nothing proposition. 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 harmful algal blooms.

- Scenic Values Threatened

The Town of Piermont Planning Board, in 2004, surveyed the opinion of Town residents and found 90% of respondents were in favor of preservation and conservation and when asked what they like about the town, people cited farms and the natural beauty of the environment. The Piermont Conservation Commission stated

"scenic beauty should be of the utmost importance when considering how our actions and development change Piermont's topography." The NH State Parks' Lake Tarleton webpage features "the higher elevation of the park offers beautiful views of the White Mountain National Forest across the lake." The "Lake Tarleton Project," while admitting the significant scenic value of the lake and surrounding forest, does not include the evaluation of the Project's scenic impact from Piermont Mountain, the most logical vantage point. From the well-traveled trails to the summit the proposed "unlogged Beauty Strip" on the north shore of the lake would be a thin lower border to the unsightly logging beyond. The scenic values inherent in the Lake Tarleton Forest will be greatly degraded if the proposed project goes forward as planned.

- Loss of a Critical Carbon Sink and Biodiversity Stronghold

Maturing and centuries-old trees are still growing across the country, but on federal forest lands many of them are vulnerable to logging. Once these maturing trees are cut down, the opportunity to develop old-growth forests will be irreversibly set back at a time when scientists are making it clear that we have only a short period of time to stabilize the climate. Our older forests are still being logged at an alarming rate -- this directly undermines the Biden administration's efforts to address climate change and protect 30% of lands and waters by 2030.

Old-growth and mature trees form the backbone of their ecosystems, absorbing the greatest amount of carbon dioxide, maintaining genetic diversity and providing habitat for all sorts of life.

- Forest Plan Out of Date

The White Mountain National Forest last revised its management plan in 2005. The ensuing 17 years have produced vast changes in science and public opinion. The National Forest Management Act says that Forest Plans should be revised after a maximum of 15 years. Scientists now inform us that we have a little less than 8 years to radically change our ways to avoid irreversible negative effects of Global Warming and the consequent Climate Emergency. Those same scientists believe that we can avoid the worst effects by drastically reducing our use of fossil fuels and, at the same time, stopping logging and allowing forests to mature on our public lands. Short of revising the White Mountain National Forest (WMNF) Forest Plan, which is overdue, a simple change in the Management Area designation for the forests surrounding Lake Tarleton to "Scenic Area" is an important first step that we can take today.

- Wildlife Impacts

Since the date that the White Mountain National Forest completed its Biological Evaluation of the Tarleton Integrated Resource Project, the Northern Long-eared Bat was proposed for listing as an Endangered Species with the full protection of the Endangered Species Act. However, the new Environmental Assessment makes no mention of the heightened risk for this imperiled mammal. Northern Long-eared Bats are uniquely dependent on mature and old forests for their survival. The bat's habitat requirements are the polar opposite of the type of habitat that will be generated from logging proposed by the Tarleton Integrated Resource Project.

In addition, there is no mention of the lethal effects on pollinators or lake water quality when herbicides are used to kill invasive species. Logging invites the introduction and spread of invasive species.

- Finding of No Significant Impact (FONSI)

A FONSI is not appropriate for this project. Instead, the White Mountain National Forest should conduct a more rigorous Environmental Impact Statement. The definition for "significantly" from the Council on Environmental Quality regulations, citing the intensity factors at 40 CFR 5108.27: of the 10 listed definitions numbers #4 and #8 and #9 seem to apply:

*#4 states "The degree to which the effects on the human environment are likely to be highly controversial". A majority of scientists throughout the world believe that logging contributes to Global Warming and must be stopped and, more than 1,200 petitions signed against this project indicates that it is "highly controversial"

*#8 states "The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, or may cause loss or destruction of

significant scientific, cultural, or historical resources". The likely damage to Abenaki cultural resources as well as the stone walls, foundations, chimneys, graveyards and dooryard plantings in the long-abandoned village of Charleston will cause the loss or destruction of significant cultural and historical resources.

*#9 states "The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973." As stated in the section on wildlife above, the Northern Long-eared Bat was proposed for listing as an Endangered Species on March 23, 2022 by the US Fish and Wildlife Service. Given this likely upgrade in protections, the Tarleton Integrated Resource Project surely warrants the level of analysis that would come with an Environmental Impact Statement.