

Data Submitted (UTC 11): 5/7/2022 1:45:15 PM

First name: Michael

Last name: Wipfler

Organization:

Title:

Comments: Under the National Environmental Policy Act (NEPA), federal agencies are required to consider a "reasonable range" of alternatives. Not only does the draft Environmental Assessment prepared for the Tarleton Integrated Resource Project fail to provide a "reasonable range" of alternatives, it fails to objectively evaluate the two options it presents and to incorporate recent scientific findings that challenge the Forest Service's preferred outcome. In so doing, the Forest Service has failed to provide the public with an honest assessment of the proposed project, thus shielding itself from significant public outrage from an informed and educated populace.

In the draft EA, the Forest Service has provided just two options for the Tarleton Habitat Management Unit - either "action" or "no action." Within the category of "action" there is just one option, which is composed of several disparate components: improving the Lake Katherine boat launch, increasing the riparian buffer around Lake Katherine, removing non-native species from former state lands, restorative work on historic apple orchards, and 900 acres of logging. These projects are not dependent or interrelated, therefore there is no reason they must be presented as an all-or-none choice.

Furthermore, the silvicultural analysis presents just one "prescription," which proposes 900 acres of logging, with significant clear cuts in an area valued for its scenic value and group selection cuts within the watershed of Lake Tarleton (the largest lake in the White Mountains) to within 100 feet of the shoreline.

The public deserves the opportunity to explore a true "reasonable range" of alternatives, which include: alternatives with reduced logging treatments, alternatives with more mixed-age prescriptions, and alternatives which focus on recreational pursuits, such as creating a network of trails (as promised when the Tarleton area was first acquired by the Forest Service).

The public also deserves a more fair, balanced, and objective evaluation of the outcomes of its "action" and "no action" alternatives.

The Environmental Assessment claims that, "This project is needed to improve wildlife habitat diversity within the Tarleton HMU, thereby helping to achieve desired future conditions for wildlife, vegetation, and recreation described in Chapter 1 of the Forest Plan." But the Forest Service has not demonstrated that these proposed actions meet a current or future need.

While it is true that the Tarleton HMU does not currently have large open areas and significant early successional forest, those conditions are abundant on adjacent lands to the Tarleton HMU, lands within the territory scale of all the named wildlife beneficiaries. What's more, there is no evidence to suggest that lack of "wildlife habitat diversity" is a limiting factor for any of the affected wildlife populations (deer, turkey, bear, moose). These are abundant and widespread species with wide-ranging individuals who select both open areas and forest areas. These species would not likely have differences in productivity, health, or distribution as a result of the proposed action or the no action. However, the EA leads readers to believe there would be benefits to these species from the proposed action. These species are able to access abundant resources of these types on lands adjacent to the Forest, and are not considered "habitat limited." It appears arbitrary to determine that the Forest should commit resources to benefit these species beyond their current condition. It appears capricious to determine the Proposed Action would have a different outcome for these species compared to no action. As a result, it would be arbitrary and capricious to carry out the proposed action to create more open space, orchards, or early successional forest on the Forest.

What the action would create would be open areas, which if left untouched, would remain as blackberry and raspberry thickets for many years. This "forest" condition would likely attract the sorts of animals the Forest Service identified as beneficiaries. But are these conditions being created to meet a wildlife need? Are these wildlife populations in the Tarleton area suffering from insufficient access to food? Or are these "forest" conditions being created to benefit hunters, who would find it easier to locate and shoot game in these settings?

If the forest service is truly interested in forest regeneration, a great deal of time and additional cost will be needed to help the latent seed bed take root and outcompete other forms of vegetation. Is the forest service committed to these efforts? If so, they should be more explicit about their continued management practices over time.

In the Forest Service's "Consequences of No Action" section, it provides a doom and gloom list of maladies that will occur if the Forest Service chooses to leave the forest in its natural state. The Forest Service makes no effort to provide a full, balanced account - one which truthfully depicts the life cycle of a forest and includes the significant benefits of mature forests.

Specifically, the Forest Service does not include any information about the significant carbon capture capabilities of mature forests, the wildlife that depend on large, contiguous mature forests for habitat (and will therefore be adversely impacted by the proposed logging operation), and mature forests ability to minimize the impact of heavy rains (which are essential in securing Lake Tarleton's water quality).

As new science emerges, we are starting to recognize the value of older forests. This is why President Biden, with guidance and support of hundreds of scientists, made Executive Order #14072. Currently we do not know the ages of the stands of trees within the Tarleton HMU, so we do not know if any stands meet the criteria of "mature" forests. This should be researched prior to the initiation of any logging. But we do not need to know the age of the trees to know that a stand of trees will never become a mature forest unless it is given time to grow.

Due to the EA's insufficient "reasonable range of alternatives" and imbalanced evaluation of the presented options, the public can not make an informed decision about the relative merits of the presented plan. The Forest Service should, at a minimum, revise the Environmental Assessment so that a full range of alternatives and an accurate evaluation of options is supplied to the general public.