

Data Submitted (UTC 11): 5/10/2022 11:59:33 PM

First name: Jake

Last name: Reder

Organization:

Title:

Comments: Dear Brooke,

Before we dive in, I want to start by thanking you for taking the time to speak with me, and for providing this opportunity to provide formal comment. As you've no doubt appreciated, many of us care deeply for this region, and I, for one, look forward to working *with* you to come to an optimal outcome. That said, and as you no doubt expect (!), I write to oppose the logging of the Lake Tarleton watershed. There are a litany of reasons for this opposition, as well as numerous options for far less impactful logging and economic benefit. I.e., my position is not that "logging is bad", but rather that, "this plan could unquestionably be much, much better." Please consider the points below, and those from the hundreds (I'm told thousands, now!) of other respondents, before taking a decision that will be felt by our children's children.

Let's Start With a Scientifically Valid Plan

First and foremost, the science that underlies the forest plan currently in use is far past its due date. While the forest plan itself has aged out by the agency's own standards (that this is common doesn't make it right), I hasten to note that the science upon which this old plan relies is typically decades older still. Updating the forest plan based upon "best current knowledge" would result in large changes in tactics and large improvements in outcomes. Related, the public's understanding of climate change, and our collective appreciation of its impacts have advanced - significantly - since this plan was authored. We would never make our military decisions willfully ignorant of the last 40 years of advances in warfare, why would we treat our natural environment differently? Especially when a significant proportion of our society (including our President) consider climate change a generational priority.

Don't Violate the Intent of the Recent Acquisition of Lake Tarleton... and the Public's Trust

This particular issue strikes very near home for me - a dear friend of mine was a large part of the impetus and indeed the primary donor behind what he and his wife thought was a way to literally give of themselves to protect these lands that they and their family have enjoyed for decades. They believed they were protecting Lake Tarleton in perpetuity.

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 Gregg 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.

Investigate Reasonable Alternatives

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.

Protect Our Scenic Values

During a pandemic, natural beauty has been demonstrated to be therapeutic. Not in the sense of "hippies like it", but in the sense of, "if Pfizer could put this in a pill they'd made billions", i.e., in the clinically validated sense. Indeed, just north of the border, doctors are prescribing park passes. We'd do well to learn from this! Closer to home, the Town of Piermont Planning Board, in 2004, surveyed the opinion of Town residents and found that 90% of respondents were in favor of preservation and conservation. 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.

Finding of No Significant Impact (FONSI)

The White Mountain National Forest invariably issues a FONSI for their proposed projects. The reason for this is quite simple....it avoids the necessity of preparing an Environmental Impact Statement (EIS). Preparing an EIS is time consuming and opens the project up to greater potential for negative analysis. As usual, a draft FONSI was issued for the Lake Tarleton Project. But a FONSI is not appropriate for this project. 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.

What reasonable alternatives exist?

Why not a wholistic management plan that seeks to optimize the entirety of the Forest Service's considerable resources under stewardship (on behalf of the public) for climate, environmental, health, scenic, recreational, economic, and any other goals that the public sees fit to value? Then both regions and methods can be optimized to best meet this "multiple bottom line".

On a less grand scale, there are forestry management methods in use in e.g., Scandinavia, that dramatically increase the economic yield of the forest while maintaining its climate, environmental, health, scenic, and recreational values. Why are we resistant to learning from others' decades of successes?

And on a hyper-local scale, Tarleton is the largest lake in the White Mountain National Forest. Thousands of people - from local residents to global tourists - enjoy it's beauty each year. If we must clear cut, must we do it in one of our beautiful State's most beautiful and beloved areas? Of course not. Of course not! This is not a "not in my backyard" argument - my backyard is 60 miles away. Lake Tarleton belongs, literally, to all of us. Let's treat it like the gem that it is.

Finally, sincere thanks for reopening this comment period, and for our conversations earlier in the process. During a "unique-in-human-history" global pandemic, outreach has been more than difficult, and I very much appreciate the Forest Service's understanding of the challenges, and continued willingness to listen - to all stakeholders.

With thanks for your time and attention,

Jake

Jake Reder, PhD (he/him/his)

CEO | Celdara Medical, LLC | 16 Cavendish Ct. | Lebanon, NH 03766 | USA

Director, New Ventures | The Geisel School of Medicine at Dartmouth | 1 Medical Center Drive | Borwell 654W, HB 7556 | Lebanon, NH 03756 | USA

Principal Investigator | DRIVEN Accelerator Hub

www.drivenacceleratorhub.com

This e-mail and any attachments are for use by the intended recipient and may contain confidential, privileged or proprietary information. Any use, dissemination, distribution, or reproduction of this message by unintended recipients is prohibited. If you have received this e-mail in error, please notify the sender immediately by telephone or e-mail and delete the original message. Thank you.