

Data Submitted (UTC 11): 5/11/2022 3:39:07 PM

First name: Geoffrey

Last name: Gardner

Organization:

Title:

Comments: Lake Tarleton is not only one of the largest lakes within the White Mountain National Forest, it's also one of the most scenic and pristine areas of its region. When Lake Tarleton, as well as neighboring Lake Katherine and the surrounding forest, were threatened by plans for development of a huge resort in 1994, the response was an effort over many years to preserve Lake Tarleton and its surrounding landscape in its natural state. Hundreds of individuals, joining with businesses, conservation organizations, the State of New Hampshire and the U.S. Congress, worked through that period to raise \$7.5 million to buy the 5,300 acres surrounding the lake, establishing public ownership of the area as part of the White Mountain National Forest. The plan for the area, as presented to the towns of Piermont and Warren by the Trust for Public Land was to "protect and conserve the wilderness quality of the Lake Tarleton area" while "stressing low impact recreational activities," enabled by a beach area, a small boat launch and a trail system. And it is in this way that the area has functioned within the White Mountain National Forest over the past twenty years for thousands of people from the nearby area and from far away.

Through this same period, Lake Tarleton and Lake Katherine have continued to be among the most pristine lakes within the White Mountain National Forest. The surrounding mostly mature forest is a thriving wildlife habitat. It has been a shock to those who use and appreciate this area and its scenic views to find that 880 acres of this land are now subject to a proposal to log 5 million board-feet of lumber. Most of this proposed cutting is to be carried out around Lakes Tarleton and Katherine, both on the steep slopes of the Lake Tarleton watershed and within 100 feet of the lakeshore and its trail. The cutting proposed by this plan will open the forest to invasive species, and this in turn will require treatment with herbicides.

The chief value of the Lake Tarleton area are its use and function as a scenic and recreational resource and its mature forest which serves as an excellent water quality resource, rich wildlife habitat, and a locus of CO2 storage and sequestration, helping to mitigate climate change. In short, it is the area's unique and pristine qualities -well used but relatively unmarred and minimally disturbed- that are most important and should be most valued. But it is precisely these qualities that will be most damaged and most lost if the Integrated Resource Plan (IRP) goes forward. In fact, the threat of damage to the area is so great that this project might better be named the Lake Tarleton Resource Fragmentation Plan.

The IRP and the Draft Environmental Assessment (DEA) that supports it are unusually and even surprisingly generic, non-specific and lacking in analysis. The claims within these documents that the forest surrounding Lake Tarleton will be improved by the logging project read for the most part like a compilation logging industry talking points or elementary level forestry generalities. Very little of what is said analyzes or even refers to the specific, let alone the unique, character and qualities of the area, its preservation history and its use over the past 20 years. The discussion for the most part is formulaic, without reference to specific qualities of the forest and its ecological functioning and without anchors in the most recent science, especially with respect to the climate value of mature forests, the ecological value of allowing forests to grow toward old growth conditions, or natural habitat restoration preservation for wildlife. Over all, the DEA pays far too little attention to the protection of biodiversity. The DEA, as just one instance of this disregard, does not consider at all the recent proposal to re-list the Northern Long-Eared Bat as endangered under the Endangered Species Act even though the Lake Tarleton area provides prime habitat for this species and is presently functioning as a biodiversity restoration area.

Further, the DEA is inadequate with respect to alternatives to the logging plan. Most urgently, the No Action alternative -the course of action most people who use the area would choose-is hardly analyzed or explored.

There is little to no detailed analysis in the DEA of either the negative impacts of the logging proposed or of the supposed benefits of the logging weighed against the present ecological, scenic and recreational functions and values of the forest that will continue if no cutting occurs. Since the DEA is so often non-specific and vague in its analysis, its conclusions seem foregone from the start and without basis in any adequate analysis. This makes it very difficult for the public to do anything but guess when evaluating what the Forest Service has in mind and what good it intends to do. For this reason, a full-scale Environmental Impact Statement should be required for

this project so that all its likely impacts can be assessed and weighed against the value of taking no action as an alternative, leaving the area alone so it can go on doing what it has been doing as a mature and functioning forest serving as a refuge for wildlife and people alike.

Finally, it is especially disturbing that the DEA reaches a summary conclusion that "no historic properties will be affected by the proposed project activities," supposedly on the basis that "archeologists completed a cultural resource review." However, a Cultural Resource Reconnaissance Report was done for the Tarleton IRP but was not available to the public until a Freedom of Information Act request was made for it. The Report documents that historic and cultural resources do in fact exist within the project area as attested by local citizens and might include significant Abenaki resources that could be discovered by more thorough research and consultation. This seems to be a further indication of the slipshod nature of the DEA.

A full-scale Environmental Impact Statement is needed for this project and should be completed before any further action is taken. At a minimum, any further action should be considered only with thorough participation and consent of the public.