

Data Submitted (UTC 11): 5/11/2022 8:36:23 PM

First name: Frank

Last name: Robey

Organization:

Title:

Comments: This Logging Project MUST be abandoned. The whole of the WMNF needs to be enrolled in Biden's 30x30 project and protected like the National Jewel that it is. The USFS needs to stop treating the WMWNF as a tree farm with the logs to be sold at below market timber sales. The AT is MUCH too close to where you want to log so that's another reason the project needs to be abandoned. We need to be protecting ALL the trees we can in order to have any chance at slowing climate change down. Those large trees help to keep the forest floor cool, clearcuts and all the other logging you want to do increase the temperatures of the forest floor. Those trees that are sequestering all that carbon need to be allowed to live not die and be burned in a biomass plant or turned into paper.

You talk about no disturbance except for logging...yet you ignore the potential for the Emerald Ash borer to kill many ash trees and thereby creating its own disturbance. I believe you must redo your EA to look at that issue.

Your Cumulative Effects Analysis is woefully lacking especially where it comes to the Northern Long Eared Bat. The USFWS is going to be listing the NELB as endangered very soon on its own volition not due to a court order thereby you know that the NELB is in deep trouble. You need to redo your Biological Evaluation as well as your EA to address how you are going to be able to address it being Endangered.

The Council on Environmental Quality (CEQ) requires agencies to consider the direct, indirect, and cumulative impacts of their proposed actions. A cumulative impact is defined as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions." Furthermore, "[c]umulative impacts can result from individually minor but collectively significant actions taking place over a period of time."

CEQ guidance on cumulative effects explains: "Analyzing cumulative effects requires focusing on the resource, ecosystem, and human community that may be affected and developing an adequate understanding of how the resources are susceptible to effects." When defining the geographic scope of the analysis area, agencies should consider whether "the proposed action is one of several similar past, present, or future actions in the same geographic area"; "other activities (whether governmental or private) in the region have environmental effects similar to those of the proposed action"; and "any recent or ongoing NEPA analyses of similar actions or nearby actions identified important adverse or beneficial cumulative effect issues." Importantly, when considering cumulative effects on natural systems, the agency "must use natural ecological boundaries."

Under NEPA, the agency must consider "[t]he 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."⁶⁷ The analysis of direct, indirect, and cumulative impacts to several of the endangered and threatened species found in the EA and supporting documents raises serious questions about the sufficiency of the EA and the potential for significant impacts.

A scientifically sound, credible Cumulative Effects Analysis (CEA) of the cumulative effect, as defined by National Environmental Policy Act (NEPA), should be conducted not just for the Tarleton logging Project but at the larger geographical scale to capture the effects of multiple actions to meet the intent and legal requirements of both NEPA and the National Forest Management Act (NFMA). Limiting the CEA to just this project is insufficient to determine impact over time and space.

You have numerous logging projects in various states of implementation, and all of them stated for the NLEB "affected but would not likely cause a trend to federal listing or loss of viability."

You need to do an EIS that will look across ALL of the WMNF at ALL of your logging projects to see how the NLEB is being killed by your loggers!!

Doing any logging around the Sentinal Mountain Area is REALLY STUPID! To do that little bit of logging 2 miles from the main area of logging is ludicrous and must be dropped.

The last thing the WMNF is the continuation of your money losing, habitat destroying, climate change accelerating logging program. STOP LOGGING OUR NATIONAL FORESTS!!! Go get real jobs working at Walmarts or something like that.

Frank Robey

The illegal boat launch MUST be removed and the area restored. Signs need to be put up saying that it is illegal to make your own boat launch on Federal property. There is no need for a logging project to accomplish this. I'm sure you could volunteers to help you remove it.

The PWO can be expanded again without a logging project. Hire a couple interns to do that.