

Data Submitted (UTC 11): 10/23/2023 10:51:48 PM

First name: Genevieve

Last name: Christy

Organization:

Title:

Comments:

I live at the foot of the Blueberry Ledge Trail and have been hiking these White Mountains for more than 40 years. In addition to comments made earlier I would like to emphasize these concerns that I feel are not adequately or thoroughly addressed in the current plan.

-Acknowledgment that the White Mountain National Forest is an ecosystem and that small disruptions in several parts can have a large disruption throughout. There is much recent research showing that many of these impacts are just coming to light and not yet fully understood. The plan needs to acknowledge the importance of these studies and incorporate them in a revised plan.

-A complete and thorough analysis needs to be done to evaluate the damage to the carbon storing capacity of disrupted soils from the removal of trees and compaction of logging especially, skid trails. As EO 14072 notes much of the carbon storage of forests is in the soil.

-An analysis of the risk of soil erosion is needed.

-As an endangered species the long-eared bat is -of course- hard to find. More efforts to locate it are needed to support a claim of 'no impact.'

-The plan needs to acknowledge the value of beech as a source of mast. Even diseased trees are producing mast. Mature, disease-free trees must be left untouched and studied as potentially resistant to the current disease.

-There is no economic analysis for the proposed harvesting of 6 million board feet. A harvest of this size should be supported by specific estimates of tree types, cost of harvesting and net revenue. In addition the plan should be specific as to which segments will be bid out as a timber sale or a management contract.

-The value of mature and old growth trees to store carbon and help address climate change are not sufficiently recognized in the current plan. We will never get the old growth forests we need if encroachments on mature growth continue. Once there is some indication that we as a country or as a planet have some small assurance that we have successfully met our climate goals, other goals can be considered.

-As is required by environmental law a reasonable alternative to the proposed plan must be offered. A no-action alternative is not a reasonable one.

The current plan should be paused for further research and analysis.

Respectfully submitted.

Genevieve Christy