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Comments: On page 24 of the Draft EA you state "The measure used to assess the impacts of timber harvesting on water quality in the White Mountain National Forest is the percent basal area removed in a watershed that contains a perennial stream.

When basal area removed in a watershed does not exceed 20 percent, there is high confidence of no measurable effect on water quality or water quantity resulting from timber harvest (Siemion et al. 2011; Wang et al. 2006; Baldigo et al. 2005; Lawrence and Driscoll, 1988; Hornbeck et al. 1993)." You have many logging projects going on right now...2011 is the latest analysis you have that there will be no impacts on water quality? Surely in the last 12 years and all the thousands of acres of WMNF you've destroyed, you've had the opportunity to do more analysis on any potential impacts...is 2011 your "Best available science?"

On page 24/24 you state ..., "the proposed action includes transportation management actions...associated with approximately 16 miles of existing unauthorized roads in the project area. Twelve miles would be converted to maintenance level 1 forest system roads" Why would you add unauthorized roads into your database? Are these illegal ATV, snowmobile or bike roads? They should all be decommissioned.

On page 25 you state "The proposed action would increase species and habitat diversity, which would improve the ability of the ecosystems within the project area to respond to change.

How do you know it will increase species and habitat diversity? Were you, or anyone working at the USFS, here the last time the average concentration of CO2 in the atmosphere was 420 ppm, (June-August 2023 was also the Northern Hemisphere's hottest meteorological summer on record, at 2.59 degrees F (1.44 degrees C) above average.) Your statement about increasing the diversity is certainly not based on the "Best available science".

You state "Over a period of 5 to 10 years, the proposed silvicultural treatments would affect less than 1 percent of the total land acreage of the White Mountain National Forest."

What about all the other logging projects that you have had going on since your last Forest Plan in 2005? Why are they not included in your Cumulative Effects analysis as required by CEQ? The whole of the WMNF should be where you do your Cumulative Effects Analysis, not just individual HMUs...there have been MANY logging projects in the last 18 years on the WMNF, they should all be included in the Analysis!

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."

You state "Therefore, effects of the proposed activities on carbon, greenhouse gases, and climate overall would be negligible."

How do you know? What studies have you done to show this? Where is your "Best Available Science"? Certainly not in your statements with nothing to back them up.

On the Northern Long eared bat you state "Not likely to adversely affect" how do you know? How many Northern long eared bats have been killed by loggers in any other of the many logging projects on the WMNF? How do you know they aren't extinct right now? Same questions for the tri colored bat. How do you know???

On page 29 you state "Few large timber harvests (more than 100 acres) have occurred in the past 10 years and notices of intent to cut timber not yet reported included no planned harvests of 100 acres or larger. No reasonably foreseeable timber cuts or any other potentially cumulative actions have been identified outside White Mountain National Forest."

This is completely wrong...YOU, the USFS, has logged THOUSANDS of acres of Mature/Overmature stands across almost all of the WMNF. You are cutting down the lungs of our planet with no regard to carbon sequestration, the ONLY carbon sequestration that actually works IF WE LET IT!!

Stop cutting trees down!!! Close and lock all the gates, and go find jobs at Walmart...the WORLD will be a much better place!