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First name: Steven
Last name: Bogart
Organization:
Title:
Comments: Subject: Comment Opposing the Lost River Integrated Resource Project (White Mountain National Forest)

To: White Mountain National Forest - Lost River IRP Comment Review

Dear Scott Hall and the Pemigewasset Ranger District,

I write to express my strong opposition to the Lost River Integrated Resource Project (IRP) proposed for White Mountain National Forest. As someone who travels from New Jersey to hike and experience the serenity and ecological richness of the Elbow Pond and Mount Moosilauke region-including a deeply memorable hike I took with family in August 2022, and with plans to return again this summer-I urge you to abandon this deeply flawed plan, which risks irreparably damaging one of New England's last best wild places.

When I hiked Elbow Pond in August 2022, the forest was thriving-a rich mosaic of mature hardwoods, lush understory, and tranquil wetland edges. Contrary to claims that logging promotes fire resilience, studies show that intact mature forests like those surrounding Elbow Pond retain moisture, minimize fuel accumulation, and offer a natural buffer against fire-far more than newly logged zones, which often dry out and invite ignition risks.

This project would permit over 1,000 acres of commercial logging-including more than 200 acres of clearcuts-in one of the most ecologically rich and visually stunning areas of the forest. Over 91% of proposed logging would occur within Inventoried Roadless Areas (IRAs), lands that were set aside to avoid industrial exploitation. These are not just lines on a map-they are living ecosystems that filter water, sequester carbon, provide homes to rare wildlife, and offer restorative experiences to the public.

Flawed Assumptions and Weak Environmental Review

The Forest Service's Environmental Assessment (EA) is inadequate. It relies on outdated assumptions and unsubstantiated conclusions, and neglects key legal and ecological concerns:

1) Endangered Species: The EA acknowledges the project is "likely to adversely affect" the federally endangered Northern Long-eared Bat, yet proceeds anyway. Public lands should serve as a sanctuary for species on the brink-not as a testing ground for destructive forestry experiments.

2) Roadless Area Logging: Logging in IRAs contradicts the spirit and intent of the 2001 Roadless Area Conservation Rule. While the EA cites bureaucratic technicalities to justify tree removal inside Carr Mountain's roadless zone, the cumulative impact-alongside the Peabody West, Tarleton, and Sandwich projects-undermines the long-term integrity of these protected landscapes.

3) Climate and Carbon: The EA dismisses the climate implications of this project, despite evidence that forests left intact store far more carbon than those logged under the guise of "resilience." Older forests are among the most effective carbon sinks.

4) Hydrology Oversight: The EA claims no water quality impacts because logging falls under a 20% watershed threshold. This assumption ignores precipitation intensity from climate change and omits analysis of slope steepness and erosion risk-critical in mountain terrain.

5) Lack of Alternatives: The EA presents only a binary choice: logging or no action. It fails to evaluate low-impact or non-commercial options such as ecological thinning or expanded wilderness designation. A half-page dismissal of the "No Action" alternative (p. 16) is not a serious analysis under NEPA.

6) Forest Fire Misconception: While the Forest Service references forest resilience, it does not cite wildfire prevention as rationale. Regardless, science increasingly supports that mature forests are more fire-resistant than logged ones. Logging operations-especially clearcuts-can increase ignition risks and reduce natural fire resilience.

Logging this forest, especially with invasive methods, robs future generations of this experience. Once roads and scars are cut, they rarely heal. We risk transforming an irreplaceable ecosystem into a patchwork of extraction zones-not because it's necessary, but because it's administratively convenient.

Conclusion

The Forest Service should scrap the Lost River IRP as proposed. It fails to meet the legal and ethical standards demanded by the National Environmental Policy Act (NEPA), the Endangered Species Act, and the public trust. I urge you to pursue true stewardship-one that honors science, listens to the public, and protects the irreplaceable character of the White Mountain National Forest.

Sincerely,

Steven Bogart