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Comments: As someone who has spent many years hiking in the Pemi and the southern White Mts (in addition to many other parts of the WM National Forest) and as someone who has studied forests and their importance for climate protection, I am extremely alarmed by this project for several key reasons:

1. Over 91% of proposed logging in the Lost River IRP is within two Inventoried Roadless Areas: one on Mt Moosilauke's flank, and one surrounding Elbow Pond. Logging in roadless areas threatens water quality and floodwater retention in addition to destroying habitat for interior forest species. No logging should ever occur in Inventoried Roadless Areas. These are among the few truly wild places left in the northeast and should be permanently protected.

2. USFS itself admits the project is "Likely to Adversely Affect" endangered Northern Long-eared Bats. It is unconscionable that the project ignores this scientific conclusion. This endangered bat can't afford to lose any more of its habitat, especially on public lands where logging is easily avoided.

3. The Lost River IRP fails to account for negative impacts on carbon and the climate, instead making the unfounded and outrageous claim that logging will benefit both climate mitigation and climate resilience!! The Forest Service should revise its assessment to do an accurate analysis of climate and carbon impacts as required by NEPA.

The Draft environmental analysis is highly flawed and not based on science. For example, in numerous sections, the Forest Service leans on threadbare and incomplete reasoning - often with no citations to support their claims!!! - that Lost River logging is necessary and would not have significant environmental impacts. In the hydrology section (p. 23), for example, the Forest Service concludes that the project would have no impacts on water "quality or quantity" because it does not exceed blanket thresholds for the proportion of an entire watershed that is logged - while including no discussion of the slope of the logged lands or the increase in extreme precipitation due to climate change, both of which certainly impact the chance of negative effects to streams. The Forest Service considers no alternatives to their proposal beside a "no-action" alternative, which they cursorily discuss in half a page (p. 16). This discussion mostly amounts to a ludicrous claim that, without the proposed logging, "the landscape would trend toward a homogeneous even-aged structure and species mix," while providing no evidence to support this claim.

This highly flawed Draft EA must be rejected and rewritten, brought up to reasonable scientific standards in order to make a responsible decision on a project of this significance and far-reaching consequences for our publicly owned lands, our climate, and critical species habitat.