Data Submitted (UTC 11): 9/11/2025 11:16:32 PM
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Comments: More than 91% of all proposed logging in the Lost River IRP is within two Inventoried Roadless Areas: one on the slopes of majestic Mt Moosilauke, and one surrounding beautiful Elbow Pond. Logging in roadless areas threatens water quality and floodwater retention, as well as habitat for interior forest species. No logging should ever occur in Inventoried Roadless Areas, period. These are among the wildest places left in New England and should be permanently protected.

The US Forest Service admits that the project is "Likely to Adversely Affect" the endangered Northern Long-eared Bat (NLEB). This endangered bat can't afford to lose any more of its habitat, especially on public lands where logging is easily avoided. The Forest Service Biological Evaluation admits there is a known NLEB hibernaculum only 0.15 miles away from the project area - and Northern Long-eared bats are known to forage and roost in a wide area beyond their winter home.

The Lost River IRP does not adequately account for negative impacts on carbon and the climate, but claims that logging will benefit both climate mitigation and climate resilience. In response to previous comments, the Forest Service added a "Carbon Report" to the project, which estimates that this single project will release 72,123 metric tons of CO_2eq from above-ground carbon pools alone - the equivalent of almost 17,000 gas-powered vehicles driven for a year. The Forest Service goes on to suggest, contrary to reams of up-to-date science, that logged forests will be more resilient to climate change, and that "ecosystem carbon stored in soils...and other pools are [sic] not likely to be affected by the proposed action" (EA, p. 30). The Forest Service should revise its assessment to do an accurate analysis of climate and carbon impacts as required by the National Environmental Policy Act.

The environmental assessment is brief, unsubstantiated, and conclusory. In numerous sections, the Forest Service leans on threadbare, illogical, 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. 28-29), 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, their existing condition, or the increased extreme precipitation expected from climate change. The Forest Service considers no alternatives to their planned timber harvests beside a "no-action" alternative which they cursorily discuss in half a page (p. 17). This discussion amounts to a concoction of contradictory, unsupported claims. On the one hand, the Forest Service notes that without logging, "old growth characteristics would develop over time", but on the other, it claims that "the landscape would trend toward a homogeneous even-aged structure and species mix." These two claims are in direct contradiction to each other - the WMNF's own definitions of Old Growth Forest and Old Forest Habitat emphasize that old forests are characterized by structural complexity and age diversity, not any kind of "homogeneous even-aged structure."