Data Submitted (UTC 11): 9/12/2025 11:32:45 AM
First name: Caleb
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Organization:
Title:
Comments: Dear Reviewing Officer Ibarguen,

Pursuant to 36 CFR 218, I am filing this objection to the Draft Decision Notice, Finding of No Significant Impact (FONSI), and Environmental Assessment for the Lost River Integrated Resource Project (#63401). I have previously submitted timely comments on this project, and I submit this objection in accordance with the requirements of 36 CFR 218.

1. Failure to Adequately Consider Ecological Impacts

The Draft Decision Notice concludes with a Finding of No Significant Impact. However, the project involves logging across approximately 1,800 acres within critical habitat units of the White Mountain National Forest. This conclusion minimizes or disregards the cumulative and long-term impacts of fragmentation on sensitive species, including neotropical migratory birds, amphibians, and large mammals that rely on contiguous, mature forest cover. The Environmental Assessment fails to sufficiently analyze edge effects, loss of interior forest, and climate change stressors that will exacerbate ecological disruption.

2. Conflict with Forest Plan and Public Values

The White Mountain National Forest Plan emphasizes maintaining ecological integrity, scenic character, and recreational value. Intensive logging within the Elbow Pond and Franconia Ridge Habitat Management Units undermines these objectives. These areas are heavily used by the public for hiking, fishing, birdwatching, and quiet recreation. Logging will degrade scenic vistas, reduce backcountry experiences, and damage the cultural and spiritual value these places hold for local communities and visitors alike.

3. Inadequate Consideration of Climate Impacts

Nowhere does the Environmental Assessment adequately assess the climate consequences of large-scale timber harvest. Removing mature trees diminishes carbon storage capacity and resilience of the forest ecosystem. In a time when New Hampshire and the nation are facing increasing climate-related challenges, any project that reduces forest carbon sequestration should require a full Environmental Impact Statement, not be minimized as having "no significant impact."

4. Transportation and Watershed Concerns

The project proposes changes to the transportation system that will expand and maintain roads through sensitive areas. Road construction and maintenance contribute to erosion, sedimentation, and long-term watershed impairment. Streams in the project area ultimately connect to the Pemigewasset River, an important recreational and ecological waterway. The analysis fails to adequately account for water quality risks, aquatic habitat disruption, and cumulative watershed impacts.

5. Alternative Analysis Deficiencies

The range of alternatives presented is narrow and does not include a true "no new logging" option. Meaningful NEPA analysis requires a rigorous exploration of alternatives that would better protect mature forest, carbon sequestration, and recreational values. Instead, the chosen alternative prioritizes timber extraction without a genuine balancing of conservation-based options.

Requested Remedy:
I respectfully request that the Forest Service:

1. Withdraw the Finding of No Significant Impact and instead prepare a full Environmental Impact Statement for the project.

2. Reconsider alternatives that prioritize ecological integrity, recreation, carbon storage, and community values over timber extraction.

3. Suspend logging operations within the Elbow Pond and Franconia Ridge Habitat Management Units until a more thorough and science-based analysis is completed.

Thank you for considering this objection. I urge the Forest Service to uphold its responsibility as steward of the White Mountain National Forest by protecting its irreplaceable ecological, recreational, and cultural values for future generations.

Sincerely,
Caleb O'Connor
Lincoln, New Hampshire