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Comments: The Sugar Mountain Project Draft EA proposes commercial timber harvest, prescribed fire, and road work across a 12,241-acre project area, but the agency's own analysis undercuts the reasoned basis for moving forward without an EIS. Most seriously, Table 4 in Section 3.2.1 discloses a 'May Affect, Likely to Adversely Affect' determination for the Indiana bat, with approximately 3,537 acres of preferred summer roosting habitat impacted, yet the agency treats this finding as fully resolved by simply tiering to a prior Programmatic Biological Opinion, without demonstrating that this project's specific footprint and timing were actually captured in that consultation.

The EA also contradicts itself on prescribed fire in the Queen Cove/North River bog rare community: Section 3.3.5 states this wetland complex is not fire-adapted and that design criteria bar ignition within it, yet the same section discloses approximately 98 acres proposed for burning there as part of the Whigg Ridge burn unit. Section 3.3.5 also contains the agency's own recommendation of 'no prescribed fire' in fire-sensitive rich cove, acid cove, and northern hardwood communities, which nonetheless occupy substantial acreage in Table 6 within the treatment footprint. And Section 3.4.1 assumes water quality is good in project streams 'despite some sediment delivery and effects on stream morphology from roads,' an assumption resting on stream data the agency's own hydrologist and botanist found incomplete after observing streams not reflected in the National Hydrography Dataset used for the impervious-surface calculations.

The Forest Service should directly analyze whether this project's specific impacts to the Indiana bat were captured in the cited Programmatic Biological Opinion, or complete a project-specific consultation given the likely adverse effect finding. It should resolve the internal contradiction over prescribed fire in the Queen Cove/North River rare community and honor its own botanist's no-burn recommendation for fire-sensitive ecozones. It should recalculate the impervious-surface and sediment-risk analysis using field-verified stream data rather than the incomplete hydrography dataset, and it should disclose what fraction of the RLRMP's 1,000-acre high-elevation early-successional habitat objective this project actually achieves rather than framing a 15-acre gain as a 65% increase. Given these unresolved contradictions, the agency should extend the comment period and prepare a full environmental impact statement before finalizing this decision.