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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.

Sugar Mountain matters to me. As a long term educator and former conservation manager, I know how much students care for this nation's wildlife and imperiled species, like the Indiana bat. Mature forests, as well as old growth, in this country are also at risk, a 2022 study found. These forests are critical for this country to mitigate the worst effects of climate change and to keep as much carbon stored as possible. The trees most resistant to fire are in our mature and old-growth forests; to actively cut old-growth and plant new trees is faulty management, if not active courting of disaster. If this goes through, this project threatens the at risk mature forests we have on federal land as well as the roosting habitat of the endangered Indiana bat. We cannot replace these in our lifetimes, if ever, and 'diversifying' the habitat for non-endangered species, such as grouse, makes no sense here.

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.