



United States  
Department of  
Agriculture

Forest  
Service

White Mountain National Forest  
Androscoggin Ranger District

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File code: 1950-1

Date: May 10, 2007

Dear Interested Stakeholder:

I am issuing a Finding of No Significant Impact (FONSI) and a Decision Notice (DN) on the North Kilkenny Vegetation Management Project, located in the Towns of Milan and Stark, Coos County, New Hampshire. I have decided to implement Alternative 3 (Modified Proposal) based on work done by resource specialists and comments provided by the public.

The project includes the following management activities; (1) timber harvest of approximately 3.4 million board feet on 1,007 acres; (2) expand three permanent wildlife openings; (3) perform restoration maintenance on 4.5 mile of existing Forest Roads; construct 0.7 miles of new road; classify 1.8 miles of unauthorized roads to Forest Road, decommission 0.5 mile of unauthorized roads; and re-establish 9 log landings and construct 3 new landings; (4) improve the septic system at South Pond Recreation Area and; (5) improve watershed functions at two locations.

The Draft Environmental Assessment (EA) did not incur any changes and is now the Final Environmental Assessment. This document as well as the Decision Notice/FONSI, which describes my reasons and conclusions for selecting Alternative 3 can be viewed on the National Forest web site at: [http://www.fs.fed.us/r9/forests/white\\_mountain/projects/projects/](http://www.fs.fed.us/r9/forests/white_mountain/projects/projects/). The DN/FONSI also contains Appendix F which responds to additional comments received after the draft EA was issued in mid-March.

I would be glad to talk with you if you have any concerns or issues regarding my decision. You may phone me at (603) 466-2713 ext. 210, or e-mail me at [kstuart@fs.fed.us](mailto:kstuart@fs.fed.us). If I am not available when you call, you may also contact either Pat Nasta ([pnasta@fs.fed.us](mailto:pnasta@fs.fed.us)) at ext. 222 or Gail Wigler ([gwigler@fs.fed.us](mailto:gwigler@fs.fed.us)) at ext. 230. Thank you for your participation in this project, and your interest in the White Mountain National Forest. Your comments contributed to my appreciation of the issues regarding this project, and enabled me to make a more informed decision.

Sincerely,

*/S/ KATHERINE W. STUART*

KATHERINE W. STUART  
District Ranger





United States  
Department of  
Agriculture

Forest  
Service

May 2007



# North Kilkenny Vegetation Management Project

USDA Forest Service  
White Mountain National Forest  
Androscoggin Ranger District  
Coos County, New Hampshire

## Decision Notice and Finding of No Significant Impact for the Environmental Assessment

### Appendix F - Forest Service Response to 30-Day Comments

Prepared by: Androscoggin Ranger District  
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**This document is available in large print.  
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**North Kilkenny Vegetation Management Project  
Androscoggin Ranger District  
White Mountain National Forest**

**DECISION NOTICE and FINDING OF NO SIGNIFICANT IMPACT**

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# **Decision Notice and Finding of No Significant Impact North Kilkenny Vegetation Management Project**

This Decision Notice describes my decision and rationale for the North Kilkenny Vegetation Management Project. It is based on the expertise of Forest Service biologists, foresters, soil scientists, hydrologists, botanists, and forestry technicians who designed the North Kilkenny project and public involvement documented in the Environmental Assessment. It also documents my finding that this project will not have a significant impact on the quality of the human environment.

## **1.0 Project Location**

The North Kilkenny Project Area consists of the northern portion of the South Pond “Habitat Management Unit” (HMU) and is 6,909 acres in size (44% of the South Pond HMU). Of this area, 5,552 acres are allotted by the Forest Plan to Management Area 2.1. It includes 1,007 acres of National Forest land proposed for vegetative management as well as lands proposed for road improvement, road construction, watershed restoration and recreation activities. The Project Area is located within the towns of Milan and Stark in Coos County, New Hampshire.

## **2.0 Purpose and Need**

### **2.1 Purpose of the Action**

The Purpose for this project is to accomplish resource objectives to meet the overall management direction for the White Mountain National Forest, as established in the 2005 Land and Resource Management Plan (LRMP), referred to as the Forest Plan. Management within the Project Area is intended to meet Forest-wide goals and objectives for riparian and aquatic habitat, transportation, vegetation, recreation, water resources, and wildlife habitat (USDA-Forest Service, 2005a, pp. 1-15 to 1-22), including:

**Riparian and Aquatic Habitat Goal:** Protect, restore, or improve riparian area conditions to benefit riparian dependent resources and values (USDA-Forest Service, 2005a, p. 1-15).

**Transportation Goal:** The Forest Roads Program will provide a safe, efficient, and seamless transportation and parking network that allows for current, continued, and projected management, use, and enjoyment of the Forest with a wide variety of challenge levels (USDA Forest Service, 2005a, pp. 1-16 to 1-17).

**Transportation Objectives:**

1. Decommission all Forest and unauthorized roads not necessary to meet the management objectives of the Forest Plan as funding is available.
2. Maintain the Forest road network to meet the requirements of the Highway Transportation Safety Act with available funding.

**Vegetation Goal:** The White Mountain National Forest will manage vegetation using an ecological approach to provide both healthy ecosystems and a sustainable yield of high quality

forest products, with special emphasis on sawtimber and veneer (USDA Forest Service, 2005a, p. 1-17).

**Vegetation Objective:**

1. Manage for commercial products using well-integrated prescriptions that protect biotic and abiotic resources and are compatible with the high level of recreation use on the Forest.

**Recreation Goal:** Provide quality day use opportunities where the natural forest setting is an important part of the visitor's experience while ensuring the balanced protection of social and natural resources (USDA Forest Service, 2005a, p. 1-13).

**Recreation Objective:**

1. Provide a healthy and safe place for visitors, and protect the natural environment.

**Water Resources Goals:** Surface waters on the White Mountain National Forest are considered "outstanding resource waters" and water quality is maintained or improved to protect existing and designated instream uses such as aquatic life. The Forest Service will manage streams at proper functioning condition (PFC) to dissipate energy associated with high water flows, thereby decreasing erosion, reducing flood damage, and improving water quality. Watersheds will continue to provide high quality water for public water supplies, Recreation activities, aquatic biota such as fish, and other purposes (USDA Forest Service, 2005a, pp 1-17 to 1-18).

**Wildlife Habitat Management Goal:** The White Mountain National Forest will use sustainable ecosystem management practices to provide a diversity of habitats across the Forest, including various forest types, age classes and non-forested habitats (USDA Forest Service, 2005a, pp. 1-20 to 1-22).

**Wildlife Habitat Management Objectives:**

1. Manage forest composition for the broad habitat types of northern hardwood, mixed hardwood-softwood, and spruce-fir forest, consistent with Ecological Land Type capability.
2. Maintain less common habitat types, such as aspen-birch where ecologically feasible and desirable, to provide for native and desired non-native wildlife and plant species.
3. Maintain high quality mature forest and old forest habitats on a majority of the forest.
4. Provide regeneration age forest and open habitats to sustain biological diversity and support species that prefer those habitats.

The Forest Plan lists the purposes for MA 2.1 management (USDA Forest Service, 2005a, p. 3-3) that apply to this project:

- Provide high quality hardwood sawtimber and other timber products on a sustained yield basis.
- Provide a balanced mix of habitats for all wildlife species.
- Manage high-use or highly developed recreation areas to acceptable and ecological standards.

## **2.2 Need for Change**

### **Transportation:**

This project assessed the transportation network required to meet the long-term management objectives within the Project Area. It also assessed which roads are needed or are required for long-term management, and which will be decommissioned (both Forest and unauthorized roads) since they are not needed for long-term management. In both cases, need has been determined with public input through the Roads Analysis process.

### **Vegetation:**

High quality sawtimber will be harvested using even-aged and uneven-aged harvest techniques in individual stands that are at the appropriate rotation age and stand density. Stands were selected for treatment based on a review of stand records, field examination of current stand conditions, and assessment of silvicultural prescriptions for each stand.

Treating these stands will promote and encourage species regeneration that is more consistent with the land capability. Land capability is defined as the inclination of the land to grow hardwoods, spruce/fir or some other forest type given the soil type, climate and geology of the land.

### **Water Resources and Riparian and Aquatic Resources:**

Watershed conditions will be restored by adding large wood and installing waterbars to old skid trails and adding large wood to streams. This would prevent run-off and erosion along old skid trails and minimize sedimentation. Old skid roads would revegetate and in some cases water would be diverted to natural stream courses. Addition of wood to a small stream channel in the project area would dissipate stream flow energy during high flows allowing increased sediment storage and stabilizing the streambed and banks. As the channel becomes more stable, habitat conditions would be enhanced for brook trout and other aquatic species.

### **Wildlife Habitat:**

An assessment was made of current and desired conditions of the South Pond Habitat Management Unit (HMU) and habitat composition and age class objectives were developed for this HMU. Field visits and HMU data analysis identified opportunities to move toward Forest habitat objectives by increasing regeneration age class northern hardwoods and aspen-birch, favoring spruce/fir on suitable sites, maintaining white pine, and expanding permanent wildlife openings.

### **Recreation:**

The South Pond Recreation Area is within the Project Area and receives high use during the summer season. The current septic system will be improved to protect the natural environment and maintain a safe and healthy place for visitors to enjoy.

### 3.0 Decision to be Made

#### 3.1 Decision Points

The Decision Notice documents activities to be implemented to meet the project’s Purpose and Need. The decision points considered in my selection of an alternative were:

1. Which of the alternatives would best move the North Kilkenny Project Area toward the Desired Future Condition outlined in the Forest Plan (USDA Forest Service, 2005a. p. 1-21) and best meet the Purpose and Need for action?
2. Which of the alternatives best addresses relevant issues raised by the public and the interdisciplinary team?
3. Would the action alternatives pose any significant environmental impact to warrant the need for further analysis in an environmental impact statement?

#### 3.2 Decision

I have decided to implement Alternative 3, the Modified Proposal (see map on page 20). I base my decision on the Environmental Assessment (EA), the North Kilkenny Finding of No Significant Impact (FONSI), direction provided by the Forest Plan and input provided through the public involvement process. I believe this alternative is responsive to the issues raised during the public scoping process (see Section 4.1 below) and meets the Purpose and Need with a balanced approach to resolving these issues. I have read the comments submitted during the 30-day Comment Period, and I appreciate the public input to this project. I considered this input carefully in making this decision. My rationale for selecting Alternative 3 is detailed in Sections 3.3 and 3.4 of this document.

Alternative 3 includes the following management activities: (1) harvest approximately 3.4 million board feet of timber on 1,007 acres of National Forest land, using both even-aged and uneven-aged management techniques; (2) expand three permanent wildlife openings by a total of 25 acres; (3) perform restoration maintenance on 4.5 miles of existing Forest Roads; construct 0.7 mile of new road; classify 1.8 miles of unauthorized roads, decommission 0.5 mile of unauthorized roads; and re-establish 9 log landings and construct 3 new landings; (4) improve the septic system at South Pond Recreation Area and; (5) improve watershed functions at two sites. Table 1 describes project activities for Alternative 3. It also includes activities listed in the design features and mitigation measures for the protection of resources

**Table 1: Activities for Alternative 3**

| ACTIVITY  | UNIT  | Alt 3   |
|---|-------|---------|
| <b>Vegetation Management</b>                    |       |         |
| Clearcut (northern hardwood)                    | Acres | 58      |
| Expansion of Permanent Wildlife Openings (PWOs) | Acres | 25      |
| Aspen-Birch Seed Tree Cut                       | Acres | 18      |
| Patch Cut (2 acres) - gross (net)               | Acres | 47 (23) |
| Shelterwood Prep Cut                            | Acres | 32      |
| Group Selection Cut (1/10 acre to 2 acres)      | Acres | 576     |
| Individual Tree & Group Selection Cut           | Acres | 90      |

| <b>ACTIVITY</b>   | <b>UNIT</b> | <b>Alt 3</b> |
|---|-------------|--------------|
| Commercial Thinning   | Acres       | 148          |
| Improvement Cut   | Acres       | 13           |
| <b>Permanent Wildlife Opening Maintenance</b>                                       |             |              |
| Prescribed Burning or Mowing of (PWOs) (includes 5 existing acres and 25 new acres) | Acres       | 30           |
| <b>Transportation System</b>  |             |              |
| Road Restoration Maintenance  | Miles       | 4.5          |
| Road Construction   | Miles       | 0.7          |
| Unauthorized road classified to Forest Road   | Miles       | 1.8          |
| Road Decommissioning  | Miles       | 0.5          |
| Landings Re-established and constructed   | #           | 12           |
| <b>Watershed Restoration</b>  |             |              |
| Rehabilitate an unnamed perennial stream flowing into Rocky Pond                    | Miles       | 0.6          |
| Stabilize sections of old skid trails near FR 208 (Percy Road)                      | Miles       | 0.8          |
| <b>Improvements to the South Pond Recreation Area</b>                               |             |              |
| Replacement of the septic lift pump, tank and sewer line                            | Feet        | 2150         |
| Replacement of the leach field at the existing site                                 | Yes/No      | Yes          |
| Installation of a new section of septic line to connect the host site to the system | Feet        | 50           |
| Replacement of old clay pipe storm drains below the parking lot                     | Feet        | 100          |

### 3.3 Reasons for Decision

Based on my review of the Environmental Assessment (EA), public comments, the project file and field reviews of the project area, I have decided to select Alternative 3. This alternative includes vegetation management, road maintenance and construction, road reclassification, wildlife habitat improvement, watershed restoration and improvements to the septic system at the South Pond Recreation Area. My decision also incorporates the relevant standards and guidelines listed in Chapters 2 and 3 of the Forest Plan and practices listed in the Design Features and Mitigation Measures in Chapter 2 of the EA.

After considering the No Action Alternative and the two Action Alternatives for managing this area, I concluded that the activities included in Alternative 3 will do the best job of creating forest and wildlife habitat conditions that will match the direction for Management Area 2.1 in the Forest Plan. Harvesting will also help re-establish and maintain softwoods such as spruce, fir and white pine in areas that historically supported these species. Alternative 3 also includes the following attributes, as described in Chapters 2 and 3 of the EA.

- It responds to public comments to defer stand 1/30 from harvest so the forest botanist can survey this stand and determine whether all or a portion should be considered an “Outstanding Natural Community”.

- Additional field reviews by the ID team helped redefine stand prescriptions to meet land capacity objectives and improve stand conditions, as well as better defined stand boundaries between hardwood, mixedwood and softwood community types.
- It eliminates 0.1 miles of road construction on the Rocky Pond Snowmobile trail, thus reducing the amount of ground disturbance and the mileage of dual use between log trucks and snowmobiles.
- By dropping expansion of a Permanent Wildlife Opening (1/4a), it maintains the riparian area of a perennial stream within stand 1/4.
- It minimizes sedimentation caused by water flowing down old skid trails, and improves stream habitat through the addition of large wood.
- It maintains water quality within the eight watersheds that comprise the Project Area.
- It maintains and constructs Forest roads required for long-term management, and decommissions unauthorized roads not needed for long-term management.
- It improves the current septic system at South Pond Recreation Area to maintain a safe and healthy place for visitors.
- It addresses various concerns raised by individuals and specialists during scoping, field tours and reviews, and analysis.

### **3.4 Other Alternatives Considered but not Selected**

In addition to the selected alternative, I also considered two additional alternatives for this project. For a detailed comparison of these alternatives see Comparison of Alternatives (Section 2.1) in the Environmental Assessment.

#### **Alternative 1: No Action**

Under the No Action alternative, current management plans would continue to guide management of the Project Area, and no timber harvest or connected actions would take place at this time.

I did not select this alternative because it does not meet the Purpose and Need for Change, nor does it achieve Forest Plan goals and objectives for Management Area (MA) 2.1 lands in the South Pond HMU. It fails to take advantage of the opportunities to create forest and wildlife habitat conditions; in particular it would continue to perpetuate the shortage of regeneration-age northern hardwoods and aspen-paper birch, and permanent wildlife openings. Stand conditions would remain unchanged, except as caused by natural disturbance and sawtimber or other timber products would not be produced. The watershed restoration project would not be implemented and sediment would continue to flow down old skid trails and large wood would not be added to streams to slow water velocity and allow gravel to build up in the channels. The septic system improvement project at South Pond Recreation Area would not take place as a result of this project.

Selection of the “No Action” Alternative does not mean that the proposed activities would not occur at another time as they could be considered under a future analysis.

## **Alternative 2: Proposed Proposal**

This alternative is very similar to Alternative 3 with several exceptions. Alternative 2 proposes 1) construction of 0.1 miles of road off FR 460 (Rocky Pond Road; 2) expansion of an additional permanent wildlife opening (PWO); 3) inclusion of stand 1/30 and; 4) differing stand prescriptions and acreages for seven stands.

I did not select this alternative because; 1) construction of 0.1 miles of new road is not needed to harvest three stands since access is achievable from existing Forest roads; 2) expansion of the PWO would be within 75 feet of a perennial stream and would compromise the riparian zone, 3) stand 1/30 requires additional field work by the forest botanist to delineate the “Outstanding Natural Community” and reserve it from future harvests; and 4) the basal area reduction for one watershed would be above the 15% threshold for water quality if stand 1/18b were clearcut (Water Resources, Section 3.7) . Alternative 3 would treat this stand using group selection instead which would allow the watershed to remain below the threshold and maintain water quality.

### **3.5 Alternatives Considered but Not Fully Evaluated**

An alternative that proposed only uneven-aged management was briefly considered, but not fully evaluated in the Environmental Assessment. This alternative is not consistent with the desired conditions of the forest envisioned within Chapter 3 of the Forest Plan for Management Area 2.1, where temporary openings produce even-aged regeneration of trees and maintained community types such as aspen-birch. The South Pond HMU has a shortage of regeneration-age northern hardwoods and aspen-paper birch, and permanent wildlife openings. Using only uneven-aged harvest techniques would continue to perpetuate this situation and would negatively affect approximately 150 species (i.e. birds, insects, and moose) that use these habitats for all or part of their life cycle.

## **4.0 Public Involvement**

On November 6, 2006, a public field tour was conducted to seek input into the design of this project proposal. The group visited the South Pond Recreation Area, walked segments of the Rocky Pond snowmobile trail, and examined several of the proposed harvest areas and one of the proposed expanded permanent wildlife openings.

This project proposal was first listed on the Quarterly Schedule of Proposed Actions (SOPA) for the White Mountain National Forest on January 2006. On November 16, 2006, a scoping report soliciting input to help with the development of the North Kilkenny Vegetation Management Project (and Roads Analysis) was sent to 250 interested people, abutters, local newspapers and various agencies and organizations. Also, an additional 800 people received e-mail notification that the scoping report was available on our website.

The 30-day Comment Period for the North Kilkenny Environmental Assessment was initiated with a legal announcement in the Manchester Union Leader on March 21, 2007. The EA was mailed to ten individuals who had requested it, and notice of availability of the EA was sent to

another seventeen individuals. In addition, the EA was posted on the White Mountain National Forest web page. During this period we received sixteen (16) responses. I have considered these comments in making my decision, and have included my response to all comments in Appendix F of this document.

#### **4.1 Issues Used to Formulate Alternative 3**

Issues identified for this project were generated from public comment as well as the Forest Service team of specialists who worked on this project. The issues of concern used to develop Alternative 3 were:

##### **Issue 1: Road Construction**

This issue relates to the benefits versus costs of road construction and was generated by the Interdisciplinary team. Looking at road costs and logging operability, it was decided that 0.1 miles of road construction was not required to access the proposed stands within the area.

##### **Issue 2: Outstanding Natural Community**

After the public field tour, several participants were concerned about harvesting within stand 1/30. This stand contains northern white cedar and potential habitat for a Regional Foresters Sensitive Species which may qualify all or a portion of it as an “Outstanding Natural Community” and would require protection according to the Forest Plan. To address this issue, the stand was deferred from treatment (EA Section 3.11 and Appendix B: Response to Comments, pg. 8)

##### **Issue 3: Expansion of a Permanent Wildlife Opening**

There was a concern that expansion of a permanent wildlife opening (stand 1/4a) near a perennial stream would compromise the 75 foot riparian management zone since the creation of a PWO would remove all standing trees. There was also concern that a well house adjacent to the proposed PWO would be at risk during future prescribed burning. To address this issue, the expansion of the PWO was dropped from treatment.

Issues raised by the public and the Forest Service which did not generate an alternative are addressed in the effects analysis or in Appendices B and F.

## **5.0 Finding of No Significant Impact**

### **5.1 Context of Effects**

Activities conducted as part of Alternative 3 would not have significant effects when considered in the context of similar projects on the White Mountain National Forest. Activities associated with my decision would be confined to the approximately 1,007 acres in the North Kilkenny project area. I have reviewed the cumulative effects of past management, combined with this project and reasonably foreseeable future actions as they are analyzed in Chapter 3 of the Environmental Assessment, and feel that the context of this decision is localized. Neither the

effects analysis nor this Decision Notice applies to decisions that may be made elsewhere, either regionally or nationally. This analysis is a site specific disclosure of the Purpose and Need, Issues, Alternatives, and Environmental Consequences for this area at this time. It was conducted with intensive public involvement and disclosure, and a scientific analysis based on site specific effects for this project exclusively. My decision to select Alternative 3 is consistent with the direction outlined for Management Area 2.1 in the Forest Plan and with the Forest Plan Environmental Impact Statement that analyzed, at a larger scale, the effects of the types of activities that will be implemented through this decision. Therefore the evaluation of significance is limited to the intensity of effects at the local level, which is described in the paragraphs that follow.

## **5.2 Intensity of Effects**

This refers to the severity of impact, as defined by the Council on Environmental Quality (CEQ) regulations 40 CFR 1508.27. The following 10 factors are considered in evaluating intensity:

### **Both Beneficial and Adverse Impacts have been Considered**

Both beneficial and adverse impacts of implementing Alternative 3 have been considered in the EA (Chapter 3). My finding of no significant environmental effects is not biased by the beneficial effects of the action. Though the effects from Alternative 3 may be both beneficial and adverse to certain resources, the EA demonstrated that these effects are relatively minor and the impacts generated are not directly, indirectly or cumulatively significant.

### **Effects on Public Health and Safety**

There will be no significant effects to public health and safety because design features are in place to minimize conflicts between proposed activities and recreational users in the area (EA, Section 2.0 and Section 3.1, and Design Features for Recreation). To provide a safe environment for loggers and recreation visitors using FR 460 concurrently in winter time, safety and speed limit signs will be posted on the Rocky Pond snowmobile trail during harvest activity and log hauling will not occur on weekends or holidays.

Town offices, local fire departments, abutters and State Forest Rangers will be notified as to the time and location of prescribed burning to minimize exposure. Prescribed burns will be controlled by fire managers so the timing, location, and intensity of the burns are moderated (See EA, Design Features Section 2.0).

### **Unique Physical and Biological Characteristics**

There will be no significant effects to unique characteristics. There are no ecologically critical areas such as wild and scenic rivers, cultural resources, adjacent parklands, prime farmland or Wilderness areas within the proposed project area. There would be no significant effects to the Great Gulf Wilderness Area. There are four designated wetlands within our GIS database that are located in the project area; Rocky Ponds, North Pond, South Pond and Pearly Lang Marsh. None of these wetlands are located within or adjacent to treated stands and would not be disturbed during harvesting activities. The selected alternative will not violate standards for

Outstanding Resource Waters for New Hampshire, nor is it expected to adversely affect Threatened, Endangered, Proposed or Sensitive species.

### **Highly Controversial**

Consultation with natural resource organizations (U.S. Fish and Wildlife Service and New Hampshire Historic Preservation Office) did not identify any scientific controversy regarding the effects of Alternative 3 on the human environment (see EA, Chapter 3). Nor did comments received from the public identify any science that contradicts the science used in the EA. Based on the involvement of these organizations, the public and Forest Service resource specialists, the predicted effects on the human environment from implementing Alternative 3 are not highly controversial.

### **Highly Uncertain, Unique or Unknown Risks**

We have considerable experience with the types of activities to be implemented. The analysis shows the effects are not uncertain, and do not involve unique or unknown risk (Chapter 3 of the EA). The effects of Alternative 3, as well as the range of site characteristics are similar to those types taken into consideration and disclosed in the Forest Plan Final Environmental Impact Statement, Chapter IV (USDA Forest Service, 2005b). The types of activities selected to be implemented are similar to activities that have occurred in the past in this area or areas that are similar. Past knowledge gained through records of timber sale inspections, stand examinations, wildlife surveys, monitoring, and applied research have provided a basis for determining that there will be no highly uncertain effects or unique or unknown risks associated with this project.

### **Precedent for Future Actions**

This is not a precedent-setting decision, since the timber harvest proposal is similar to many other harvests conducted on the White Mountain National Forest over many decades. The watershed projects are also similar to other restoration work that has occurred on the Forest (for example Connor Brook and Great Brook watershed restoration projects). The improvements to the South Pond Recreation Area are consistent with on-going maintenance work that is required to maintain a safe and healthy experience for visitors as well as to protect water resources. The activities I have decided to implement with Alternative 3 are consistent with the Forest Plan goals for Management Area 2.1.

### **Cumulative Impacts related to Other Actions**

Alternative 3 does not individually or cumulatively reach a level of significance. The Environmental Assessment (Chapter 3) describes the anticipated cumulative effects on recreation, inventoried roadless areas, vegetation, non-native invasive species, soils, water, riparian and aquatic habitats, wild and scenic rivers, air, wildlife, threatened, endangered and sensitive species, visuals, heritage, and socio-economic factors. I am satisfied after reviewing the Environmental Assessment that these cumulative effects are not significant. Where appropriate, design features and mitigation measures will be implemented to minimize any potential adverse effects.

## **Effects to Significant Scientific, Cultural or Historical Resources**

A cultural resource report (CRRR #07-02-01) was completed for the Project Area. Based on field surveys and a review of historic maps and literature there are no known significant historic or cultural resources and no adverse effects are anticipated to the heritage resources present in the Project Area. The New Hampshire State Historic Preservation Office (SHPO) concurred with the findings of our cultural resource survey (March 2007).

## **Threatened and Endangered Species and Their Habitats per the Endangered Species Act.**

Compliance with the Endangered Species Act and protection of species and their habitat are described in the Biological Evaluation (BE) and Wildlife Section (Section 3.9) of the EA. These reports document the determination that Alternative 3 will have no effect on any federally endangered, threatened, or proposed species. No critical habitat is designated or proposed on the White Mountain National Forest for any species.

The U.S. Fish and Wildlife Service concurred with the determination that the proposed project will not have adverse effects to Canada lynx.

## **The Threat or Violation of Federal, State or Local Laws or Regulations that Protect the Environment**

The action will not violate Federal, State and local laws or requirements for the protection of the environment. Applicable laws were incorporated into the Forest Plan Standards and Guidelines (USDA Forest Service, 2005a, Chapters 2 and 3), and Alternative 3 complies with the Forest Plan.

## **6.0 Findings Required by Other Laws and Regulations**

My decision to implement Alternative 3 is consistent with the intent of the Forest Plan's long term goals and objectives. The project was designed in conformance with Forest Plan Standards and Guidelines. Other applicable regulatory requirements and laws are listed below:

### **NFMA (National Forest Management Act)**

This project complies with guidelines that insure vegetation management provides a sustained yield of forest products, promotes diverse plant and animal communities, and occurs in suitable locations. The proposed project area lies within Management Area 2.1 which is suitable for timber harvesting practices in accordance with the National Forest Management Act. Suitability of proposed stands for harvest was confirmed by field examination.

No timber harvesting is planned within areas covered by the 2001 Roadless Area Conservation Rule or the recent Ninth Circuit Court ruling regarding these areas.

Even-aged management has been selected as an appropriate method to meet the forest vegetation and wildlife habitat objectives within the project area. I used the following reasons to determine this appropriateness:

- Forest Plan Direction for Management Area 2.1 allows both even-aged and uneven-aged harvest techniques to be used.
- Wildlife objectives in Chapter 1 of the Forest Plan (pp. 1-20 and 1-21) include creation of regeneration age forest and open habitat to sustain biological diversity and support species that prefer those habitats. Regeneration age class can be created immediately through even-aged harvest.
- In Appendix B of the Forest Plan (pp. B-3 and B-4), it is estimated that 15,000 acres of even-aged harvest will be needed to work toward the vegetative and other multiple used desired conditions and objectives in the first decade of Plan implementation
- Silvicultural prescriptions for even-aged management practices in the project area have considered the suitability and response of tree species to this type of management. Red and sugar maple, paper and yellow birch, white ash, aspen and white pine are the predominant species in stands where even-aged management will be used and are well adapted to this type of management. Evidence of this is the fact that the current forests in the project area developed from even-aged management that took place in the past.

The clearcut prescription proposed for stands 1/18a, 1/39 and 1/70, 6/9 and 6/13 is an appropriate method to create regeneration wildlife habitat in the northern hardwood community types (USDA Forest Service. 1986a. Appendix M, DeGraaf and Yamasaki, 2001) and the seed tree prescription proposed for stand 6/34 is the preferred method to create regeneration-age habitat in the aspen-paper birch community type (Perala 1977 and Safford 1983, USDA Forest Service. 1986a., Appendix M). These prescriptions were developed by foresters and the wildlife biologist who visited each stand and reviewed the inventory data before making a recommendation.

Clearcutting will create conditions where sunlight reaches the forest floor causing hardwood seeds to germinate and seedlings to grow rapidly. Aspen is an early successional species and regenerates in full sun conditions. The warming of the forest floor stimulates thick sprouting of root suckers over large areas around the cut trees. Aspen is a desirable wildlife species that does not regenerate at all in partial shade and regenerates optimally using clearcutting. Paper birch, like aspen is also an early successional species that regenerates best in full sunlight through seeds and stumps sprouts. If clearcutting or seed tree cuts are not used in these stands nor techniques that open up the area to provide sufficient sunlight to penetrate through the canopy (ie. shelterwood or partial cut), then lower quality shade intolerant species will develop in the understory and the aspen and paper birch will eventually disappear from the stands.

Clearcutting is also used to create permanent openings which are maintained in grassy and/or shrubby conditions. These openings contain raspberries, blackberries, pin cherry, and various forbs, grasses and shrubs which respond well to the abundance of light and warm temperatures.

I have determined that clearcutting is the optimum harvest method to regenerate aspen-birch and other shade intolerant or partial shade intolerant tree species, as well as a create openings that

grow non-arboreal species. The result will be dense stands of seedling and creation of temporary and permanent openings that are valuable and used by many wildlife species for food and cover.

In addition to the consistency findings pertaining to the White Mountain National Forest Land and Resource Management Plan, the National Forest Management Act (NFMA) establishes specific guidelines for prescriptions involving vegetative manipulation in National Forest. My decision is consistent with the guidelines for management prescriptions that involve vegetative manipulation of tree cover [U.S.C. 1604] as follows:

1. *The prescription should be best suited to the multiple-use goals established for the area with potential environmental, biological, cultural resource, aesthetic, engineering, and economic impacts, as stated in the regional guides and Forest Plans.* The use of even-aged management prescriptions is optimal for stands which even-aged management is proposed because it regenerates stands that are mature, supplies wood products to the regional economy (USDA-Forest Service, 2005b, p 3-117) and achieves Forest Plan wildlife objectives (Chapter 1 and Section 3.7 of the EA).

For this project, even-aged harvest is proposed where it met optimality requirements for silvicultural and/or wildlife habitat objectives. Even-aged harvest such as clearcutting and seed tree cuts will create regeneration and early successional habitat to meet wildlife habitat objectives in the South Pond Habitat Management Unit (NFMA 16 USC Section 1602(F)(i)) and to regenerate stands based on the species present and the site conditions.

2. *The prescription should assure that lands can be adequately restocked except where permanent openings are created for wildlife habitat improvement, vistas, recreation uses and similar.* The treatment prescribed for stands, the timber types and the soils are the same or very similar as those where restocking has been successful in White Mountain National Forest MA 2.1 lands during past management entries (Project Record: Stocking surveys for War Camp, South Pond, Rocky Pond and Percy Timber Sales and Forest Monitoring Reports).
3. *The prescription should not be chosen primarily because it would give the greatest dollar return or the greatest output of timber, although these factors shall be considered.* I am selecting Alternative 3 because it best responds to vegetation, wildlife, water quality and transportation issues (North Kilkenny EA: Sections 3.3, Vegetation, 3.72 Water Quality, 3.10 Federal Threatened, Endangered and Proposed Regional Forester Sensitive Species and Section 3.15- Socio-economics), rather than to maximize the greatest dollar return or greatest output of timber.
4. *The prescription should be chosen after considering potential effects on residual trees and adjacent stands.* Prescriptions for the project take into account how harvested trees will be cut and removed from the forest as well as how residual trees will be protected. With the exception of stands proposed for regeneration harvest, timber harvesting will not take place in spring or early summer when tree bark is the most susceptible to damage. Trees in timber sales are marked for cutting by experienced personnel who plan for the protection of residual trees in and adjacent to cutting areas. Trained and experienced timber sale administrators will

lay out skid trails and administer loggers' operations to assure that remaining trees are protected.

5. *The prescription should avoid permanent impairment of site productivity and ensure conservation of soil and water resources.* Forest Plan Final Environmental Impact Statement explain that modeling indicates timber harvesting is a small factor in the reduction of soil calcium, and that no impact on long-term soil productivity is expected from this practice on the White Mountain National Forest. This project includes no whole-tree harvesting, and Forest Plan standards requiring tree tops and limbs to be scattered on harvest areas and skid trails will maintain site productivity. The application of Forest Plan standards and guidelines, Best Management Practices, Mitigation Measures and Design Features will prevent soil compaction, erosion, and sediment delivery to streams, and will conserve water and maintain water quality in the project area.
6. *The prescription should provide the desired effects on water quantity and quality, wildlife and fish habitat, regeneration of desired tree species, forage production, recreation uses, aesthetic values, and other resource yields.* Silvicultural prescriptions incorporate and comply with Forest Plan standards and guidelines in Chapters 2 and 3 for the maintenance of water quality and quantity, and protection of fish habitat. Prescriptions have been applied to similar timber types and site conditions on the White Mountain National Forest for decades, with consistent results in producing regeneration of desired tree species, wildlife habitat, and forage. Hunting will be improved as small and large game populations are expected to increase in the project area from habitat changes. Some short term changes in scenery will be noticeable, but the silvicultural prescriptions comply with scenery management objectives in the Forest Plan.
7. *The prescription should be practical in terms of transportation and harvesting requirements and total costs of preparation, logging, and administration.* The project will construct two new roads and utilize several existing roads. The existing roads require restoration maintenance and temporary drainage structures. Road maintenance prior to hauling timber will be performed, as is customary, by the timber sale purchaser. Timber sale operations will use conventional equipment commonly used by loggers in the White Mountain National Forest. Harvesting requires no specialized equipment or unusual procedures. Preparation and administration of the timber sale project is representative of typical projects and costs for this area.
8. *The prescription complies with the requirement regarding culmination of mean annual increment (MAI). (16 U.S.C. 1604(m)(1).)* Stands of trees authorized for even-aged regeneration cuts have all passed the age where the culmination of mean annual increment of growth has occurred. This determination is based on stand data and Chapter 3 of the White Mountain National Forest's Final Environmental Impact Statement for the Forest Plan, pages 3-146 and 3-147. MAI is also not a consideration, because the even-aged regeneration harvests are driven by resource objectives and desired conditions other than timber production (EA Section 3.9 Wildlife).

### **NEPA (National Environmental Policy Act)**

This act requires public involvement and consideration of potential environmental effects for proposed actions and alternatives. The Environmental Assessment is used to document compliance with this act.

### **National Historic Preservation Act**

The White Mountain National Forest consults with the New Hampshire State Historic Preservation Office (SHPO) prior to reaching a decision on the project. We have received concurrence from SHPO on the cultural resource report.

### **Migratory Bird Treaty Act**

Implementation of Alternative 3 complies with Executive Order 13186, dated January 10, 2001 which governs the responsibilities of Federal agencies to protect migratory birds. The original Act of 1918 was passed to regulate the hunting of migratory birds and the sale of their parts.

### **Endangered Species Act**

The White Mountain National Forest completed a site-specific Biological Evaluation (BE) of the potential effects to Threatened, Endangered, Proposed and Sensitive Species (TES). It was determined that there are not likely to be adverse effects to these species.

### **Clean Water Act**

The beneficial uses of water in streams draining the project area would be maintained during and following the implementation of Alternative 3 through the application of standards and guidelines, design features and mitigation measures and the proper design and layout of all project work.

### **Clean Air Act**

The Air Resources section of Chapter 3 in the Environmental Assessment analyzes the effects of prescribed burning on air quality. This analysis found that National Ambient Air Quality Standards are not likely to be exceeded by the prescribed burning as planned in Alternative 3.

### **Wild and Scenic Rivers Act**

The Upper Ammonoosuc is the closest river to the North Kilkenny project listed in the Forest Plan as eligible to be designated under this Act. The eligible section is approximately 5 miles downstream of the point where any of the brooks draining the project flow into the Upper Ammonoosuc. Alternative 3 will not affect any designated or eligible rivers under the Wild and Scenic Rivers Act (EA Section 3.6).

## 7.0 Implementation Date

If no appeal is received, implementation of this decision may occur on, but not before, 5 business days from the close of the appeal filing period. If an appeal is received, implementation may not occur for 15 days following the date of appeal disposition.

## 8.0 Administrative Review or Appeal Opportunities

This decision is subject to appeal in accordance with 36 CFR 215.11(a). A person has standing to file an appeal only if they submitted comments or otherwise expressed interest in the proposal during the 30-day Comment Period. A Notice of Appeal must be in writing and clearly state that it is a Notice of Appeal being filed pursuant to 36 CFR 215.11(a). Appeals must be filed within 45 days of the date of legal notice of this decision in the Manchester Union Leader to:

USDA Forest Service, Eastern Region  
ATTN: Appeals Deciding Officer, North Kilkenny Project  
626 East Wisconsin Avenue  
Milwaukee, WI 53202

The office business hours for those submitting hand-delivered appeals are: 8 am-4:30 pm (Central Time), Monday through Friday, excluding holidays. The Notice of Appeal may also be faxed to 414-944-3963, Attn: Appeals Deciding Officer, USDA Forest Service, Eastern Regional Office; or it may be electronically mailed to [appeals-eastern-regional-office@fs.fed.us](mailto:appeals-eastern-regional-office@fs.fed.us). Electronic appeals must be submitted in a format such as an email message, plain text (.txt), rich text format (.rtf), Word (.doc), or any software supported by Microsoft applications.

It is the responsibility of appellants to ensure that their appeal is received in a timely manner. The 45-day time period is computed using calendar days, including Saturdays, Sundays, and Federal holidays. When the time period expires on a Saturday, Sunday, or Federal holiday, the time is extended to the end of the next Federal working day. The day after the publication of the legal notice of the decision in the Manchester Union Leader is the first day of the appeal-filing period. The publication date of the legal notice of the decision in the newspaper of record is the exclusive means for calculating the time to file an appeal. Appellants should not rely on dates or timeframe information provided by any other source. If you do not have access to the Manchester Union Leader, please call the Androscoggin Ranger Station at 603-466-2713, ext. 222 (TTY 603-466-2856) for the published date. There will be no time extensions for appeals.

When there is a question about timely filing of an appeal, timeliness shall be determined by:

1. The date of the postmark, e-mail, fax, or other means of filing (for example, express delivery service) an appeal and any attachment;
2. The time and date imprint at the correct Appeal Deciding Officer's office on a hand-delivered appeal and any attachments; or
3. When an appeal is electronically mailed, the appellant should normally receive an automated electronic acknowledgment from the agency as confirmation of receipt. If the appellant does not receive an automated acknowledgment of the receipt of the appeal, it is the appellant's responsibility to ensure timely receipt by other means.

Appeals must meet the content requirements of 36 CFR 215.14. At a minimum, an appeal must include the following:

1. Appellant's name and address, with a telephone number, if available;
2. Signature or other verification of authorship upon request (a scanned signature for electronic mail may be filed with the appeal);
3. When multiple names are listed on an appeal, identification of the lead appellant (§215.2) and verification of the identity of the lead appellant upon request;
4. The name of the project or activity for which the decision was made, the name and title of the Responsible Official, and the date of the decision;
5. The regulation under which the appeal is being filed, when there is an option to appeal under either this part or part 251, subpart C (§215.11(d));
6. Any specific change(s) in the decision that the appellant seeks and rationale for those changes;
7. Any portion(s) of the decision with which the appellant disagrees, and explanation for the disagreement;
8. Why the appellant believes the Responsible Official's decision failed to consider the substantive comments; and
9. How the appellant believes the decision specifically violates law, regulation, or policy.

The Environmental Assessment for this project is available for public review at the Androscoggin Ranger District, 300 Glen Road, Gorham, NH 03581. In addition, the EA is posted on the White Mountain National Forest web page [http://www.fs.fed.us/r9/forests/white\\_mountain/projects/projects/](http://www.fs.fed.us/r9/forests/white_mountain/projects/projects/). Questions regarding the EA should be directed to Gail Wigler at 300 Glen Road, Gorham, NH 03581 (phone: 603-466-2713 ext. 230, FAX and TTY: 603-466-2856).

## 9.0 Responsible Official and Contacts

The Responsible Official for the North Kilkenny Vegetation Management Project is Katherine Stuart, District Ranger of the Androscoggin District of the White Mountain National Forest.

For additional information concerning this decision or the Forest Service appeal process, contact: Pat Nasta at 300 Glen Road, Gorham, NH 03581, or by phone (603-466-2713 ext. 222), or by FAX and TTY (603-466-2856).

/s/ Katherine W. Stuart  
KATHERINE W. STUART  
District Ranger

5/10/2007  
Date

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**Appendix F**  
**Responses to Public Comments on the**  
**North Kilkenny Vegetation Management Environmental Assessment**

The North Kilkenny Environmental Assessment was offered for public review and comment for 30 days from March 21 through April 20, 2007. The invitation to comment was promoted through mailings, a Legal Ad in the Manchester Union Leader and posting the document on the White Mountain National Forest website. Sixteen (16) responses were received via conventional mail, e-mail and orally.

We appreciate the time respondents spent reviewing this Environmental Assessment (EA) and thank you for your thoughtful comments.

The comments are arranged by category and then by commenter and whenever possible, the respondent is quoted directly and in the context of their full comments. The categories are:

1. Support of proposed North Kilkenny Vegetation Management Project
2. Vegetation
3. Wildlife
4. Non Native Invasive Species
5. Soils
6. Water
7. Prescribed Burning
8. Recreation
9. Transportation
10. Economics
11. Safety
12. Watershed Restoration
13. General Comments

All correspondence is filed in the North Kilkenny Environmental Analysis Project File located at the Androscoggin Ranger Station in Gorham, NH, and is available for public inspection.

**1.0 Support of Project**

- 1. Comment:** “I support Alternative 3 for the logging and restoration project in the WMNF, given the efforts that are being made to retain current winter and summer use activities while logging and restoration work is ongoing.”
- 2. Comment:** “ ...would like to pass on their support of the #3 Alternative in the logging project in the South Pond area that runs along snowmobile Primary Trail #109.”
- 3. Comment:** “I enjoy snowmobiling in the area in question, and feel that what is being proposed is in the best interests of all concerned. I can see that there will be many benefits. Surely one of the most important is economic, as well as wildlife-habitat and recreation.”

- 4. Comment:** “Just wanted to voice my support for Alternative 3 on this project. Thank you.”
- 5. Comment:** “I write to express my support for Alternative 3 for the logging and restoration project along snowmobile trail 109 in the White Mountains National Forest. My particular interest is in maintaining safe winter snowmobile access to the area during logging activity.”
- 6. Comment:** “The South Pond Association Board of Directors met on March 28, 2007 to discuss the Environmental Assessment for the North Kilkenny Vegetation Management Project that was issued on March 15, 2007. The Board voted unanimously to endorse this project with respect to road impact issues on South Pond Road and Kelly Road.”
- 7. Comment:** “I am emailing my support for Alternative 3 for the logging and restoration project. Thank You.”
- 8. Comment:** “Aside from timber harvest the area offers a wide variety of recreation activities, including Hiking, Scenic and fall foliage [sic] viewing, Camping, Cross country skiing, SNOWMOBILING, Mountain biking, Snowshoeing, Wildlife watching, Hunting, Fishing, and Swimming.

Environmentally, there are many benefits including wildlife diversification, wildlife openings, better management of certain forest species and watershed improvements. Economically it will give a boost to the towns of Stark and Groveton as well as Coos County and provide much needed support for local loggers and wood processors. As snowmobilers, we get a small benefit in that a few areas of the PT 109 trail will be improved. I support the White Mountain National Forest in their efforts to serve the needs of many and not just the wishes of a few."

- 9. Comment:** “I have read the Environmental Assessment for the North Kilkenny Vegetation Management Project and would like to lend my support to Alternative 3.

It appears that you have done a great job in integrating input from the public to create a plan that addresses concerns of naturalists, residents and recreationists while utilizing renewable forest resources in a prudent way.

As a part-time resident in the area, I spend many days each year in the North Kilkenny project area. Over the past 5 years, I have seen moose, bear, fisher cat, owls, fox and many members of the rodent family but I have been disappointed by the lack of deer sign and sightings. Hopefully this project will provide a food source that will bring them back to the area.

I also think your plans for improvements in and around the recreation area will help to preserve the outstanding water clarity of South Pond.”

- 10. Comment:** “I am writing in favor of Alternative Number 3 for the North Kilkenny Vegetation Management Project. I have taken the time to read the March 15, 2007 letter and Environmental Assessment and would support this alternative as outlined.

This alternative seems to make sense for so many different parties that have interests in this geographic area.

Although I am not an expert on all the details of Vegetation Management I am in favor of preserving the environment for wildlife, natural beauty and of course recreation. All of these we can appreciate in my family. We are also snowmobilers who have great respect for the lands we are privileged to ride on.”

- 11. Comment:** “I support the proposed action to harvest timber on 18.1% of lands in Compartment 1,6,7,8 and South Pond HMU for the purpose of diversifying plant material, age class and wildlife habitat, improving stand quality, enhancing growing condition and the provision of quality sawtimber.”
- 12. Comment:** “I support the implementation of Alternative 3: Modified Proposal in it’s general form. I appreciate the attention to which the Forest responded to comments made on the field tour and in the scoping responses.”

**Response:** Thank you for your support of the North Kilkenny Project.

## **2.0 Vegetation**

- 1. Comment:** “pg 3-4 the forest service "silviculture" guide is a crock. That kind of guide was used in England where it ended up virtually treeless.”

**Response:** The lead author for the silvicultural guides (*Silvicultural Guide for Northern Hardwood Types in the Northeast* (Leak et al. 1987) is William Leak who has over 50 years of silvicultural experience on the White Mountain National Forest. This guide is approximately twenty years old and is still relevant for today’s northern hardwood management. It provides scientific methods on how to properly manage northern hardwoods for long term sustainability.

- 2. Comment:** “appendix b-3 you have both said there is no stress and then admitted that there is stress, so you have a conflict here in your information. such frequent cuts are in fact stress on vegetation.”

**Response:** Trees that are healthy and have sufficient growing space are not stressed and show good growth rates. Trees that incur insect damage or are diseased are under stress because they can not function properly and are no longer able to grow at their full potential. These are the trees that will be harvested so to provide additional growing space for healthy trees and to encourage regeneration of a new generation of trees.

- 3. Comment:** “pg 6- you want to "regenerate" northern hardwoods and aspen birch. WITH GLOBAL WARMING THE CLIMATE HAS CHANGED AT THE WHITE MOUNTAINS AND YOU CANT GO BACK TO WHAT THE AREA WAS FIFTY YEARS AGO. IT WONT "REGENERATE".

**Response:** “The conditions of today’s stands are based on past management practices that go back over fifty years. Looking at old timber sales, stocking surveys and stand data, current stands contain the same species as they did fifty years ago, though the species mix may be slightly different depending on past harvest treatments. Global warming is not dictating our current stand conditions and species mix, rather it is the land capability which pre-determined where and what species grew on a piece of land. Land capability takes into account the soil type, climate and geology of the land. Stocking surveys are required three years after a clearcut, seed tree cut, individual tree selection and group selection harvests. We have consistently found across the forest that stands are 100% restocked within this time. Within clearcuts and seed tree cuts, stocking surveys show that paper birch and aspen are successful at re-colonize these areas. Within all harvested stands, northern hardwood regeneration has been successful.

- 4. Comment:** Table 2 (EA pg. 18) lists 13 acres of “Improvement Cut” out of a total of 1,007 acres, this seems inadequate.

**Response:** Prescriptions were developed by district foresters and the district biologist with input from the recreation assistant district ranger, forest botanist, forest hydrologist, forest soil scientist and forest landscape architect. Each stand is distinct and we looked carefully at past management history, species composition, tree age and size class distribution, physical condition of the trees, the ecological land type, land capability and HMU objectives prior to developing a prescription. Once we had all the information then we decided what management treatment would move each stand toward the desired future condition.

Stand 1/32 is very unique from all other stands in that it is an uneven-aged stand that contains a diverse mix of species, which includes paper birch, spruce/fir, pine and cedar. The commercial improvement cut in stand 1/32 would remove some of the mature, lower quality northern hardwood trees and retain most of the softwoods to encourage a more mixed wood composition. Another possible treatment option to maintain this stand as uneven-aged is individual tree selection. This treatment entails harvesting trees from all species, size and age classes and would include harvesting the cedar and pine. Because we wanted to maintain most of the softwood component we did not select this option. We considered commercial thinning, but did not choose this prescription because it is generally used for even-aged stands. We considered, but did not select group selection because it would produce more hardwood regeneration and lead to a greater hardwood component in the stand. We did not consider even-aged treatments such as clearcutting and shelterwood because of the cedar and pine present within the stand.

We went through this process for all stands to come up with the final prescriptions. We looked at what is best for each stand and did not consider the amount of acres per prescription.

- 5. Comment:** “I support the acre adjustments for the proposed regeneration-age acres for northern hardwoods. I would like to see efforts made to increase diversity even farther by aiding and abetting the regrowth of less visible species; ironwood, cedar and white ash. These species would appear to benefit from patch cut and selective cuts proposed, but they have specific needs that should be addressed.

**Response:** Under Section 2.0 Design Features for *Wildlife*, minor species such as ironwood and cedar will be maintained. Ironwood is associated with northern hardwoods and is typically an understory species and rarely occurs in the overstory or dominates a stand. Ironwood is unsuited for commercial timber production because it is usually small in diameter and height. The species doesn't have any specific needs aside from preferring a wetter site, and is shade tolerant.

Eastern white cedar is most often associated with cool, moist, nutrient-rich sites, particularly on organic soils near streams or other drainage-ways. For seedling regeneration, although moisture is often the most important factor during the first few years, ample light is needed for continued seedling development which is why white-cedar seedlings reproduce well on skid roads. White-cedar can withstand severe suppression for several years, and it responds well to release not only during the reproduction period but at nearly all ages. As long as the site remains relatively moist and there is ample light, the cedar will continue as a minor species within the stand.

White ash is common in many of the stands, but is not a dominant species. The only specific requirement for white ash is that it grows on well on rich, moist well-drained soils. Since site and soil conditions will remain be unchanged, ash will continue to grow and regenerate.

### **3.0 Wildlife, TES and Rare Species**

- 1. Comment:** “pg 9 - I don't believe logging or "wildlife corridors" are necessary. You don't need to make a trail for wildlife, which if you leave it safe and natural, wildlife can make their own corridors. It is unfortunate that the lands they need to live on are always given away for cement roads or some other macadam project of no necessity.”

**Response:** Some species of wildlife travel along certain natural features such as streams or riparian areas. These are referred to as wildlife corridors. We are not trying to create wildlife corridors through timber harvest. Page 81 of the EA acknowledges that natural wildlife corridors or travel ways may be temporarily disrupted during active logging operations. Some wildlife species, such as moose and white-tail deer will travel on skid trails created by the logging operation, especially in the winter because they exert less energy traveling on a compacted trail then moving through deep snow. Upon completion

of the timber sale, skid trails usually re-vegetate back to native plant species within one to two years.

**2. Comment:** “Logging makes wildlife and birds homeless, so they die.”

**Response:** A certain number of individual species may be displaced or killed during active logging operations. However logging also benefits wildlife by providing an array of habitats. The wildlife strategy was developed based on research that indicated that a diversity of forest types and age classes is needed to provide for the habitat needs for the full array of wildlife species that inhabit the White Mountain National Forest (DeGraaf et al. 1992, DeGraaf and Yamasaki 2001).

**3. Comment:** “A significant change has apparently been made in MA 2.1 Age Class Objectives (Plan 1-21) without giving the public an opportunity to comment. This information appears in an answer to comment 6 and 7, page 10 and 11, Appendix B in the EA and would otherwise not have been made public now. “Goals should be considered when planning projects and activities and management should move the Forest toward these desired conditions.” Table 1-04 Age Class Objectives (plan 1-21) clearly lists Old Age Class. Deviations from a standard require a Plan amendment. Goals and Objectives are even more basic and an amendment should be sought for the change.

**Response:** The MA 2.1 age class objectives for “old” in the Forest Plan are not different than the “old” age class objectives for the South Pond HMU. The Forest Plan states on page 1-21 that the “old age class” objective for the Forest “is based on the amount of MA 2.1 lands forestwide identified as unsuitable for timber harvest. The old age class objective, which is listed as “unsuitable for harvest” for the South Pond HMU (EA pg 79) is based on the amount of MA 2.1 lands identified as unsuitable for timber harvest in the South Pond HMU.

What is confusing is that the existing acres of forest in MA 2.1 that meet mature and old age class criteria, as described in Appendix D of the Forest Plan, are displayed together in the South Pond HMU as “Mature Age Class”

The rationale for doing this is described on page 2-3 of the Terrestrial Habitat Management Reference Document (USDA Forest Service 2005c) and summarized here: “During Forest Plan revision, the Forest Service debated whether and how to modify the age class objectives that were in the 1986 Plan. The WMNF does not have any known species that require old (as opposed to mature) forest habitat. However, many members of the public expressed a strong interest in prohibiting harvest in a portion of MA 2.1 to increase age class diversity on the managed landscape. In evaluating how to meet this concern and ensure a high level of habitat diversity in MA 2.1, the Forest Service recognized that nearly one-quarter of the forest land in MA 2.1 is unsuitable for timber harvest and therefore will not be harvested in the foreseeable future. These stands are currently young, mature, or old forest habitat, and they will continue to age and evolve into old forest. The Forest Service determined that so much forest habitat is unsuitable for harvest that it would result in a

diverse landscape and meet public concerns without altering management on other lands. This led to creation of an old age class objective to recognize the fact that a substantial portion of MA 2.1 lands would not be harvested. At both the Forest and HMU scale, the old age class objective is based on how much MA 2.1 land is unsuitable for timber harvest; it is not affected by classification of current habitat condition. Because the WMNF does not have any known species that require old (instead of mature) forest habitat, combining the two age classes will not substantially alter the analysis of habitat suitability in an HMU. Therefore the decision was made to combine the mature and old age classes for HMU-level analysis, labeling it mature forest habitat since all of it meets or exceeds the criteria for that habitat. The intent of the old age class objective will remain, so a substantial portion of each HMU will not be harvested and will increase the diversity of habitat conditions on the landscape. To minimize potential for confusion from having an old objective but no old current condition, it was decided to change the label for lands that will provide old forest habitat in the future from “old objective” to “land unsuitable for harvest.”

The two documents that describe the ecological setting for timber and habitat management on the White Mountain National Forest are the “WMNF Ecological Document” (USDA Forest Service 2002b) and the Terrestrial Habitat Management Reference Document (USDA Forest Service 2005c). The rationale for the goals and objectives for habitat types and age class described in the Forest Plan (pages 1-20 to 1-21) are described in these documents.

- 4. Comment:** “Difficulty in discriminating between mature and old age classes mentioned in the EA Appendix B11 do not apply to unsuitable lands because it can be dedicated for the old age class regardless of present age.

**Response:** We are not going to re-label this column based on rationale described on page 3 of the Terrestrial Habitat Management Reference Document (USDA Forest Service 2005c)...To minimize potential for confusion from having an old objective but no old current condition, it was decided to change the label for lands that will provide old forest habitat in the future from “old objective” to “land unsuitable for harvest.”

The discussion of old age class in the EA Appendix, page B - 11 is not referring to unsuitable lands that will become old age class in the future regardless of age condition now. This discussion is referring to MA 2.1 lands in an HMU that are currently in old and mature age class. The difference in age between the mature and old age class is described by habitat type in Appendix D of the Forest Plan.

- 5. Comment:** “Expressed as percentages of “Current Condition”, the last column becomes 12, 29, 18, 15 compared with 15, 21, 26, 22 in table 1-04 Age Class Objectives (Plan 1-21).

**Response:** The first set of numbers (12, 29, 28, 15) in Table 15 (EA p. 79) represents the % of unsuitable lands in MA 2.1 by habitat type for the South Pond HMU. The second set of numbers (15, 21, 26, 22) in Table 1-04 (plan 1-21) represents the % of unsuitable lands in MA 2.1 forest wide.

**6. Comment:** The Plan requires that projects consider goals and move the Forest towards them, but the Plan states that some changes such as increasing Spruce-Fir to the desired level may require decades or even centuries.

**Response:** We agree. This is stated on pages 1-20 and 1-21 in the Forest Plan.

**7.0 Comment:** “I would like to see the issue of rare and TES species addressed in this section as several of the areas we visited and several of the stands exist in soils with aspects appropriate for these species. Many of the areas proposed for treatment are far enough from human access to minimize the threat of collection and loss. They may well be served as appropriate reservoirs for these species. An evaluation of the use of some of the treated acres for rare and TES species would be welcome.”

**Response:** The section “Species Diversity” you refer to on page 44 is under the Timber Resource Section (Section 3.3) and is addressing this resource. Rare and TES species are addressed in the BE and on page 91 (Section 3.10) of the EA.

No rare or TES plant species were discovered, nor are documented from any areas proposed for treatment or project action under any alternative of the North Kilkenny project. Some occurrences of TES or rare plant species do occur in the general vicinity of the project and other areas may contain soils and nutrient conditions suitable for supporting TES plants. Areas to be treated were surveyed for TES plants and none were observed despite being surveyed by qualified individuals at an appropriate time of year. In some cases surveys took place at a time of year when particular species may not have been easily identifiable. In these instances, the species were carried forward through the assessment process and all potential impacts to it were evaluated (see biological evaluation for a listing of these species). It is not possible, nor desirable to manage all lands containing suitable habitat for a TES species in the hopes that the habitat will be colonized at some point in the future.

**8.0 Comment:** “I support the development of the proposed larger permanent wildlife openings as these serve a greater diversity of wildlife and develop a greater diversity of plant cover than do smaller openings. I support the inclusion of fire as one method of maintaining PWO’s and encourage the use of fire as a method of increasing diversification and encouraging atypical plant germination. These areas should be evaluated for NNIS encroachment and also for the potential for short term rare and TES regeneration.

**Response:** We appreciate your support for enlarging our permanent wildlife openings and manage them through prescribed fire. All of the wildlife openings were surveyed for rare and TES species and NNIS plant species in 2006 (page 12 of BE in Project File, page 6 of the Wildlife and non-native invasive species report in Project File). Design features listed for NNIS should minimize the potential for NNIS species to become established in newly created openings. Also each permanent wildlife opening is surveyed every two or

three years to evaluate the need for maintenance. Any NNIS species encroachment would be noted at this time.

If planned management of a wildlife opening naturally causes a TES species to occur, the opening will be managed to encourage and protect that species. The WMNF does not actively create or manage habitat in the hopes that a TES species will colonize the area, as this is a highly unlikely occurrence that may hamper other resource management objectives.

- 9. Comment:** “Potential habitats occur in the project area for several other species. Please check to determine if small-whorled, large whorled and nodding pogonia, bog candle, and other *Platanthera* sps, *Corallorrhiza*, ginseng, and *Chimphila* sps. should be added to the list.

**Response:** The potential occurrence of federally endangered, threatened, and proposed (TEP) and Regional Forester Sensitive Species (RFSS) and associated habitats are addressed in the Biological Evaluation. The species that occur on the TEP/RFSS list for the White Mountain National Forest are listed in Table 2 of the Biological Evaluation (Project File). The TEP species that are included in this table are based on information from the U.S. Fish and Wildlife Service concerning which federally listed species occur on the White Mountain National Forest (USFWS 2006). During Forest Plan Revision, a Species Viability Evaluation (SVE) was conducted to identify which species may be of viability concern on the Forest (USDA Forest Service 2005 b, page 3-209). A recent update of the Regional Forester Sensitive Species list (USDA Forest Service 2006a) is based on the information from the SVE review. Any species not listed in Table 2 of the Biological Evaluation is not believed to be of viability concern on the Forest and therefore was not considered as part of this analysis.

All TES plant species were evaluated and surveyed for during project surveys. The biological evaluation and its associated table reveals the dispensation of all species considered, including autumn coralroot (*Corallorrhiza odontorhiza*), nodding pogonia (*Triphora trianthophora*), and ginseng (*Panax quinquefolius*) The comments submitted refer to several other species. According to the forest botanist, large whorled pogonia (*Isotria verticillata*) has been reported from NH, but only from Rockingham County and does not occur on the WMNF. Bog candle (*Platanthera dilatata*) is a common species in NH, occurring in many wetland, stream bank, and bog/fen communities. It does occur in the project area. Only one rein orchid, pale green orchis (*Platanthera flava* var. *herbiola*) is considered rare in NH. This species occurs in Strafford, Rockingham, and Hillborough County. There is a Coos County record for this species but it appears to be a mis-identification. It is not known to occur presently or historically on the WMNF. No other coral roots are considered rare in NH or on the Forest. No *Chimaphila* species are considered rare in NH or on the WMNF.

- 10. Comment:** “I would like to see the needs of rare, TES species addressed at the Comparison of Alternatives level in this document and elevated to inclusion in Table 2 and Table 3 under the heading of resource.

**Response:** Tables 2 and 3 provide quantifiable measures for comparing alternatives. For many of the resources, there is at least one numeric measure. However for analyzing the effects of the proposed project on rare and TES species, it is difficult to define a quantifiable measure to differentiate the alternatives. Because the effects are descriptive they do not fit the format of the tables. Though the effects are not listed in the table, they are analyzed for each alternative in Section 3.10.

- 11. Comment:** “...one objective is to provide a balanced mix of habitats for wildlife species. How about identifying what species will benefit and what the negative impacts are on other species. In a regional context this project will reduce habitat for some species such as lynx, fisher, and others.”

**Response:** Wildlife habitat goals for the White Mountain National Forest are to provide a diversity of habitats across the Forest (USDA Forest Service 2005a, Chapter 1- pages 20-21). Both Action Alternatives would meet some of the habitat goals for the South Pond HMU and move the Forest towards landscape-level habitat objectives. These effects are described in more detail in the Wildlife Section of the EA (Section 3.9). This section also described positive and negative effects on wildlife species. DeGraaf and Yamasaki 2001 provide a more detailed account of the full array of wildlife species that occur in the New England and their habitat preferences. For example from this publication, you could determine all of the species that would benefit from clearcuts versus which all of the species that would benefit from the presence of mature spruce-fir habitat. The effects of this project on TES/RFSS species such as Canada lynx are described in the Biological Evaluation and summarized in Section 3.10 of the EA.

#### **4.0 Non-Native Invasive Species (NNIS)**

- 1. Comment:** “pg 2-7 All logging should be banned... it causes exotic invasives to take over.”

**Response:** Migration of non-native invasive species into an area is typically through wildlife or wind transporting seeds, and the risk is greatest one to two years after harvesting, when native plant species are starting to revegetate sites. The risk of this occurring is very low in the Project Area since there are no established NNIS species in or adjacent to any of the stands proposed for treatment. The risk of introducing NNIS is further reduced through the implementation of Design Features (Section 2.0 of the EA, Design Features *Invasive Species*).

- 2. Comment:** “I would like to see that effort continued into the further 10 years as increased traffic and increased recreation use further compromise a near pristine setting. I would like to see the reed canary grass removed by herbicide use and replanting so as to minimize its potential to spread....I disagree with the statement on pg 49 that “it is not a species of great concern and it does not require control actions.” As the only defined NNIS in the project area; let’s eliminate it completely; providing a project area that is and should remain NNIS free.

**Response:** The entire WMNF is constantly under scrutiny and being surveyed for NNIS. Nearly all WMNF employees have received some level of NNIS identification training. Timber sale areas including associated stream crossings are reviewed prior to and following the close of operations. All equipment used by logging contractors must be visibly free of plant materials and seeds prior to entering the project area.

In regards to reed canary grass, this species is listed on the WMNF invasive plant list and its potential control considered under the recently approved Forest wide Invasive Control Project Decision Notice. It is currently not a high priority for control action on the WMNF for several reasons. It is widespread and abundant both on and off the Forest. Although populations on the WMNF in this project area are limited, populations on private land and along roadways are abundant. Due to this, it is likely that if controlled within the project area, the site will be re-colonized from infestations occurring outside the National Forest. In light of this the incursions within this project area are not the best use of valuable and limited NNIS control resources. Valuable Forest resources can be more adequately protected by directing control resources at species infestations that can be effectively and permanently controlled. Finally, and most importantly, there is considerable information indicating that two genetic strains of reed canary grass occur in North America. One strain is native the other is a highly aggressive strain imported from Europe. There are no widely accepted field characters that separate the two genetic types. The North American strain is believed to be native to the Pacific Northwest, but ranges to Illinois, and perhaps further east. Given its uncertain status, it is imprudent to pursue any control of this species at this time.

**3. Comment:** “Stream crossings and their associated sedimentation issues can be both persistent and prone to invasion by NNIS. These areas should not only be monitored for sedimentation, but also for NNIS establishment. Annual visitation for the first five years should be included in the EA.

**Response:** In Section 2.0 of the EA under Design Features for *Invasive Species*, to prevent the spread of invasive species before ground disturbance is initiated, weeds must be controlled that already existing in the project area. A botanical survey of the area did not find any invasive species of concern in the project area (Section 3.4 Non-Native Invasive Plants, pg. 48). To ensure that the site remains free of invasive plants, the timber sale contract states that prior to moving to the sale area, the Purchaser must take reasonable measures to ensure that each piece of equipment is free of soil, seeds, vegetative matter or other debris that could contain or hold seeds. The Purchaser must also advise the Forest Service of measures taken to clean off-road equipment and arrange for a Forest Service inspection prior to such equipment being placed in service. The chance of invasive weeds being introduced into the site due to harvest activity is minimized if all precautions are taken. Monitoring of past timber sales have not shown any invasive weeds being introduced due to harvest activities.

## **5.0 Soils**

**1. Comment:** “pg 2-7 All logging should be banned. Logging causes erosion...”

**Response:** With the implementation of Best Management Practices and Forest Plan Standards and Guidelines, erosion concerns from the vegetation, watershed and recreation projects are almost negligible. See the Soil analysis section of the EA (section 3.5) for erosion effects.

In regard to roads, though road maintenance may initially cause ground disturbance, improving and maintaining roads can prevent future erosion. Research has shown that maintenance, such as resurfacing roads with a layer of gravel, reduces sediment losses (National Council for Air and Stream Improvement, Inc. 2000). Resurfacing and replacing culverts would help maintain the road and prevent future erosion problems (Moll et al. 1997). Proposed road construction would take place on soils that are moderately to well-drained sandy loam with slopes less than 20 percent. There is some soil erosion potential from new construction due to exposure of mineral soil, but all road construction would follow Forest Plan Standards and Guidelines as well as New Hampshire BMPs to minimize the soil erosion potential. Upon completion of the timber harvest, all roads would be rehabilitated to BMP standards, which have proven to be effective in preventing soil erosion (BMP New Hampshire 2004; Maine Forest Service 2003 and 2005; Stafford, et al. 1996).

In regard to harvest activity, under Alternative 3, approximately 40% would be winter harvest only and the remaining stands would be harvested in summer/fall/winter. With frozen soils, proper skid trail locations, and careful closeout at the end of operations, minimum surface soil erosion or soil compaction is likely to occur (BMP New Hampshire 2004; Maine Forest Service 2005 and 2005; Stafford et al. 1996). Over-snow operations would produce very little compaction, since operations will not have direct contact with mineral soil and effects from compaction would disappear by the following winter. Harvesting and skidding within stands during summer or fall on expose mineral soil, would likely cause some surface soil erosion due to the loss of organic cover. However, proper skid trail layout and management such as utilizing breaks in terrain and avoiding steep slopes in accordance with Forest Plan standards and guidelines (USDA-Forest Service 2005a, p 2-30) and limiting operations to dry conditions (New Hampshire BMPs) would largely minimize or avoid soil erosion. It is expected that soils should fully recover from any compaction within three years of the end of operations (Donnelly et al. 1991).

The landings are well placed because of their gentle terrain and well-drained soils. Truck traffic and skidder operation would churn the soil surface and expose mineral soil leading to on-site soil erosion within the boundary of the log yard; however, the combination of careful site selection and management of the log yard during use would limit the extent of erosion and prevent long-term soil erosion impacts. At the time of sale closeout, the log landings would be graded and stabilized to prevent erosion before they can revegetate, and to accelerate recovery from temporary soil compaction (FSH 2509.22, Section 6.38).

## **6.0 Water**

### **1. Comment: “Logging causes water problems.”**

**Response:** Water problems related to the proposed timber harvest activities are prevented in two ways. The first way is through project planning and design. The proposed vegetation management activities which include logging have been carefully considered through the ID team process which includes an experienced forest hydrologist and soil scientist. The second way is through project design features, best management practices (BMPs), and other mitigations. Many of these practices are applied to the project in a site specific manner as described in the water resources section in this EA. As explained in this section, the proposed activities are guided by Forest Plan Standards and Guidelines, with additional measures used in a site specific manner to limit water resource effects to short term and localized. For example, effects to water quality and water quantity are assessed using an indicator related to the percent of basal area removed within a 1<sup>st</sup> or 2<sup>nd</sup> order perennial watershed.

In regard to water quantity, research at the Hubbard Brook demonstrated that in watershed where there is less than a 25% reduction in basal area, no measurable increase in baseflow discharge is expected in stream channels associated with the subwatersheds of first and second order perennial streams. Within the project area, because the Action Alternatives do not exceed the 25% threshold no measurable increase in baseflows and no related change in stream stability in the 1st and 2nd order steam channels is expected as a result of the proposed timber harvest activities (USDA-Forest Service, 2005b). By using this indicator provided by research from a watershed located on the Forest (Hubbard Brook), effects related to increased water yield in streams are avoided.

A similar indicator is used to assess effects to water quality. Using multiple research sources, a conservative level of 15% basal area removal is used to assess effects to water quality. Additional stream protection measures would be implemented (a 100 foot no harvest zone will be implemented on North Pond within stands 1/63 and 6/4.) to ensure water quality is maintained. It is unlikely that changes in pH or other chemical parameters would result as a consequence of the Alternative 3 in all the perennial watersheds.

Forest Plan Guidelines for stream and perennial riparian areas also provide for an uncut buffer on all perennial streams unless prescribed to benefit hydrological or ecological functions associated with stream or riparian area. For areas outside the watershed restoration area, the canopy and related shade will remain intact on all perennial streams within the project area. Within the watershed restoration area however, trees may be taken within 75 feet of the channel though continuous canopy and stream temperatures would be maintained along the stream banks.

Research has shown that the usual harvest practices, such as those on the White Mountain National Forest, do not result in sediment movement and do not pose a risk to water

quality (Brown, 1983). Implementation of the 2005 Forest Plan Standards and Guidelines would minimize any opportunity for sediment to reach the banks of any perennial streams. No harvest would occur within 25 feet of perennial stream banks and only limited uneven-aged harvest would be allowed within an additional 75-foot Riparian Management Zone, except for North Pond Brook where a 100 foot no harvest zone will be implemented. This applies to areas outside the watershed restoration area; for areas adjacent to the watershed restoration project, tree may be harvested within 25 feet of perennial stream channels. This is permitted under the Forest Plan if it benefits the hydrological or ecological function of the associated stream or riparian area.

## **7.0 Prescribed Burning**

**1. Comment:** “pg 61 - stop all prescribed burning, which releases in the burning mercury and fine particulate matter too small to see (not smoke). such fine particulate matter settles in the lungs causing lung cancer and causes heart attacks, strokes, asthma, pneumonia, allergies among other diseases. you should not burn. we don't need dirty air and you kill fellow americans when you dirty the air.”

“pg b23 being notified about poison air doesn't make breathing the poison air any easier or more healthful for american citizens.”

**Response:** Mercury content in forest vegetation is a result of atmospheric deposition. Studies show that mercury is released in gaseous and particulate smoke when plants burn. The mercury does not originate from the burn, it exists in the forest; the fire contributes to the process of cycling mercury (Friedli et al. 2003). Research suggests that the re-emission of mercury due to prescribed fire accounts for less than 1% of total human caused emissions in the United States (DiCosty et al. 2006).

Action will be taken during a prescribed fire to reduce smoke exposure to sensitive receptors. Public notification of elevated air pollutants helps sensitive persons minimize or prevent their exposure.

Particulate matter smaller than 2.5 microns is generally generated from combustion processes. Carbon emitted from prescribed burning in the form of fine particulate matter (PM<sub>2.5</sub> and smaller) makes up only 5% of that emitted by all human caused sources in the eastern US (Monroe, M. 1999). Minimal amounts of fine particulate matter (PM<sub>2.5</sub>) will be emitted during the prescribed burning of this proposed project. EPA sets a pollutant standard index category of “good” when PM 2.5 is 40µ/m<sup>3</sup> or less. There has been no indication that prescribed burns of the proposed magnitude would cause an area to exceed this standard.

Prescribed burns are controlled by fire managers so the timing, location, and intensity of the burns are moderated. This moderation reduces hazards to public safety hazards, potential for property damage, and adverse effects on air quality.

## **8.0 Recreation**

- 1. Comment:** Chapter 3 gives inadequate consideration to recreation. This is an Urban Forest so recreation should be given high priority. Overall, “Economic impacts from recreation exceed all other economic impacts combined. Furthermore, the presence of the White Mountain National Forest is a major attraction for visitors who use state parks and commercial recreation facilities in the Forest Region (FEIS 5-520). Table 3-106 (FEIS 3-513) shows that employment and income from timber are small compared with employment and income from recreation. Visitors like big trees and a “natural” appearing forest and dislike clearcuts; management which takes that into account would enhance the recreational value.”

**Response:** The Forest Plan worked to strike a balance among the many uses and values of the National Forest, and placed a strong emphasis on recreation use across all management areas. Those visitors preferring a largely unmodified environment will find that opportunity across more than 54% of the land base. Other recreation visitors, including hunters and wildlife watchers may prefer areas with wildlife habitat created as a result of timber management. Even within the land available as part of the timber base the opportunity will continue to be available in many places to experience large trees and what will appear to most visitors as a "natural" forest.

- 2. Comment:** “I support the reconstruction of the septic leach field and storm drain as the long term benefits are beyond measure. Erosion control practices will be essential and should be in place prior to disturbance. I would like to see native but strongly rhizomatous grasses used to revegetate these areas as their strength against flowing surface water is well documented.”

**Response:** During construction standard erosion control measures will be required as part of the contract. The White Mountain National Forest has established several native seed mixes for varying uses across the Forest. All seeding and planting of plant materials must utilize native materials. One of these seed mixes is identified for erosion control. It contains both native grasses and forbs.

## **9.0 Transportation**

- 1. Comment:** “The EA should attempt to quantify the effect heavy truck traffic on road maintenance and consider negative effects on other traffic.”

**Response:** All the roads used for this project are built to handle legal load limits and logging trucks are required be within the legal load limits. Also as part of the timber sale contract, road deposits are collected which go toward continued road maintenance.

The South Pond Road receives the highest usage during the summer season when people visit the South Pond Recreation Area and their camps along North and South Pond, and/or go hiking on the Kilkenny Ridge or Devil’s Hopyard Trails. These trails receive low to moderate use even during peak season (e.g. school vacation weeks, holiday weekends).

Harvesting will occur after August 1, and visitors and camp owners may encounter several logging trucks a day on the road. Signs will be posted to inform drivers of logging activities. We have used the South Pond Road in the past for hauling timber and have not had any past safety issues.

## **10. Socio-Economics**

- 1. Comment:** “Effects on prices and marketability for private woodland owners should be considered”

**Response:** This was considered in the 2005 Forest Plan Final Environmental Impact Statement (USDA. Forest Service 2005b pg. 3-511). Looking at the cumulative effects of the Forest’s timber program on private timberland owners, the Forest has the potential to influence stumpage values, particularly in the high quality sawlog markets which could consequently have an effect on private timberland owners. The Socio-Economic Assessment estimated that if the Forest was harvesting at its allowable sale quantity of 24 MMBF/year, the Forest share of the wood harvested in the three county area of New Hampshire would increase from 3% experienced in 2001 to 6%. It is possible that an increase in supply could depress timber values however, the magnitude of the effect should not be dramatic due to the relatively low share of the Forest’s contribution in the overall market. It is also possible that the market is elastic enough to absorb this additional supply with no appreciable effect on stumpage values. This was seconded by New Hampshire Timberland Owners Association, in which indicated that the Forest Service could have an effect on prices when the market is either extremely high or low, but it would not be significant (S. Wingate 2007).

- 2. Comment:** “I would like to see the EA address the sale of superior timber (peel or veneer grade, panel or grade 1 saw logs and beams) as a special function of this project.”

**Response:** Within the EA, we don’t get specific on the types of wood products that can be produced from harvested logs because market demands and prices can greatly fluctuate from month to month. Companies that purchase our logs are often looking for specific products and species, and will utilize the log to achieve maximum value. The value of the harvested wood is reflected in bid prices and we used past bid prices to generate timber values for the EA. The White Mountain National Forest is known for producing high quality sugar maple, red maple and yellow birch sawlogs which greatly benefits local communities.

- 3. Comment:** “I feel additional logging at this time is unwarranted based on the current status of the timber market.”

**Response:** As stated in the above response, the market demands and prices fluctuate from month to month based on regional, national and world-wide demand. Within the past five years, timber sales on the White Mountain National Forest have consistently sold and received multiple bids proving that there is a demand for wood products produced on this Forest. Refer to Appendix A (pp. A-54 – A-56) of the 2005 Forest

Plan Final Environmental Impact Statement for additional economic information in regard to the Forest's timber program.

## **11. Safety**

**1. Comment:** Concerned about driver safety on the South Pond Road during harvest operations, especially during the fall season. The South Pond is narrow and winding and is concerned that there is the potential for accidents between log trucks and passenger vehicles. A suggestion is to postpone harvest operations until closure of the South Pond Recreation Area.

**Response:** We do not want to limit the fall season of operations until after Labor Day because the weather during the fall season can be very unpredictable. Typically August is one of the driest months and the weather can become to wet from mid September through mid October. We are also concerned about vehicle safety and signs will be posted informing drivers of ongoing harvest operations. It should be realized that these roads were built to DOT specifications which take into account turning radiuses to accommodate large vehicles such as log trucks. It is the responsibility of both passenger vehicles and log trucks to stay within their own lanes. If residents of North South/Pond road or visitors to the South Pond Recreation Area encounter unsafe conditions, they should notify the office and the situation will be evaluated. Provisions in the timber sale contract can be enacted which allows the Forest Service to limit times of log hauling, limit the loads/day, restrict hauling on the weekends and holidays, and/or discontinue hauling until a specific date.

## **12. Watershed Restoration**

**1. Comment:** " I would like to see permanent vegetation cover actually planted to prevent future erosion in Duke Brook...We have several strong perennial grasses with rhizomous habits that would best help resolve the erosion and potential sedimentation issues."

**Response:** Where possible we prefer to let areas naturally regenerate to native vegetation. In addition, due to its step pool morphology which is largely dependent on large wood, the addition of grass is not needed to provide stability to Duke Brook. Erosion in the watershed is largely related to concentrated flows from old skid roads and interception of surface waters. The proposed treatments of old skid trails by waterbars and adding woody material to the road surface will either directed water off the road surface and back into a natural stream channels or cause sediment or organic matter to build up reducing surface flows along the road. Over time this will eliminate erosion and allow natural vegetation to reestablish on the road surfaces. In addition, road maintenance activities associated with the selected alternative in Duke Brook will improve road drainage along the system road in the lower part of Duke Brook's watershed, thereby reducing impacts associated with this road.

**2. Comment:** "200-500 pieces of wood per mile is up to 1 piece per 10 linear feet of road space. This seems very high for the purpose of old skid trail stabilization. Again, it seems as if properly constructed water bars would require little more effort with a great deal more gain. I

cannot support the necessary use of personnel, time effort, energy if there are better means of stabilization

**Response:** For this project, we analyzed the effects of either constructing water bars or placing wood in skid trails to have the option of either method. Placing wood in skid trails slows overland flows and allows organic matter to build up creating a layer of organic debris which fills in the eroded channels within the road. Waterbars would redirect water off the trail and does not allow organic matter to build up along the eroded portions of the skid trails. Waterbars require maintenance and can concentrate water, resulting in erosion, especially when maintenance doesn't occur. In contrast, the use of large wood provides roughness along a larger area thereby reducing water velocities, breaking up flow concentrations, reducing erosion, and encouraging sediment deposition. This, in turn allows vegetation to grow, resulting in additional roughness and protection from erosion. During project implementation, specialists will decide which method is appropriate at selected locations in regard to effectiveness and efficiency.

**3. Comment:** "I remain opposed to the indiscriminate addition of woody material to streams whose velocity will not support their retention. The increases in pool frequency, gravel bar depositions, complexity and reduced flow rates are more normally associated with whole tree deposition and tree falls into and across streams. Adding woody material will not duplicate that process when stream flows are rapid enough to ensure its timely removal. Please review soil based literature and then request information of the two White Mountain National Forest Research Stations to determine if these issues have been documented in any form on the WMNF.

**Response:** We assume the stream you are referring to is the unnamed stream that flows into Rocky Pond. The stream is approximately 10 feet wide. The goal of the proposed watershed project is to create organic debris dams by placing wood throughout the stream channel. Likens and Bilby (1982) demonstrated that streams that have experienced deforestation had greatly diminished input of woody material necessary to create debris jams. Many streams in the White Mountains, like the stream proposed for treatment, are still recovering from unregulated land use that occurred many decades ago.

The addition of wood to streams is carefully considered and in keeping with natural processes, documented stream restoration methods, and research studies. The stream proposed for treatment is characterized by high gradient channels with low sinuosity and step pool morphology. Large organic material (woody debris) is important for the creation and maintenance of the step pool systems in this small stream, especially since the bed material is less than boulder size. Past forest activities have resulted in the removal of trees and large wood along this stream. Streams where past logging has occurred have been shown to be lacking of debris dams (Likens and Bilby 1982). This true of the small stream where this work in being proposed. As a result, the stability and morphology that large wood provides in these systems is lacking. In addition, old skid trails have directed and concentrated additional water to this small stream. In the absence of large wood and without the benefit of large boulders or bedrock, the stream can't dissipate the stream

energy associated with high flows, doesn't capture sediment as efficiently, and cannot develop the diverse channel characteristics (step pools in this case) that provide habitat to aquatic life.

There is substantial scientific literature that has examined both the benefits of woody debris jams in streams and the movement variability in woody debris in mountain streams, including a study conducted in 1977 at the Hubbard Brook Experimental Forest in the White Mountains of New Hampshire. At the Hubbard Brook study site, the authors found 320 to 640 debris jams per mile in 1<sup>st</sup> order streams and 160 to 240 debris jams per mile in 2<sup>nd</sup> order streams (Likens and Bilby, 1982). They also concluded that debris jam formation was determined by a "key" piece of wood that initially blocked the stream channel. They found a relationship between the diameter of this key member of the wood jam and the channel width at the location of the jam. We believe trees of 4-8" diameter can easily serve as "key" members, thus leading to the accumulation of smaller pieces of wood necessary to form a debris jam.

Other scientific literature has documented the relationship between the length of stable wood pieces and bankfull width of the stream channel. In Oregon, studies found less than 10% of the instream wood moved over an 8 year period in streams averaging 11 and 17 feet in width, (Lienkaemper and Swanson, 1985). In a stream that averaged 39 feet wide, approximately 50% of the wood moved over the 8 year period. The study concluded that the higher the ratio of wood length to stream channel width, the higher the probability of a piece of wood becoming stable. Given these results, and observations of stable wood found in the White Mountain National Forest, and the width of the stream proposed for treatment (<10 feet), we believe that a substantial proportion of the trees we place in the brook will be retained where they are placed. Those pieces that move during high stream flows will collect on stable pieces, thus leading to the desired stream conditions over time.

### **13 General Comments**

**1. Comment:** "I was pleased to see comment #5 on page Appendix B-24. Many times I have thought this way, especially where so many more qualified people have already worked on this project. I think this particular assessment showed why public involvement is good. It shows me at least that some things do slip by and public input helps."

**Response:** As stated in the response to comment #5 in the EA, we are very receptive to public comments and rely on them to develop alternatives and make well informed decisions.

**2. Comment:** "pg 5 there is no "need" at all for this action."

**Response:** The Purpose and Need for this project go together. The Purpose is to accomplish resource objectives to meet the overall management direction for the White Mountain National Forest, as established in the 2005 Forest Plan. Management within the Project Area is intended to meet Forest-wide goals and objectives for riparian and aquatic

habitat, transportation, vegetation, recreation, water resources, and wildlife habitat (USDA-Forest Service, 2005a, pp 1-15 to 1-22). Management activities are Needed because existing conditions are inconsistent with the objectives and desired condition for vegetation, wildlife, watershed conditions and transportation needs.

**3. Comment:** “appendix b-4 are you meeting the needs of who - the profiteers in the area who will rape this nationally owned by national taxpayers site? the local lumber barons are happy about this. certainly national taxpayers are getting nothing out of this slash and burn policy.

**Comment:** “north kilkenny vegetation alleged "management" which again means "logging" I oppose harming and hurting 1,000 acres to harvest 3.6 mmbf of trees. this assault on our national forests, which are owned by national taxpayers who paid for them to preserve them, is being scammed by the profiteering of the national forest service, which is far far too cozy with lumber barons and only services them on the taxpayers backs.

**Response:** As stated in response #2, this project will meet multiple needs:

- Its meets the Forest’s need to manage a minimum road system that is safe and responsive to public needs and desires; is affordable and efficient; has minimal adverse effects on ecological processes, ecosystem health and diversity, and productivity of the land; and is in balance with available funding for needed management actions.
- It meets the public’s need for high quality sawtimber.
- It meets some of the towns of Milan and Stark’s financial needs through receipt of the timber tax (10% of the harvest value).
- It meets some of the Coos County’s financial needs through the 25% Fund Act of 1908 which benefits schools and public roads.
- It meets local and surrounding communities’ economic needs by providing jobs (ie. logging, trucking, machinery operators) and raw materials for mills (both locally and regionally).
- It restores watershed conditions by adding wood to stream channels and minimizing sedimentation from water flowing down old skid trails,
- It meets some of the South Pond HMU objectives and moves the Forest towards landscape-level habitat objectives.
- It meets the public needs for having safe and healthy recreational area to enjoy (South Pond Recreation Area).

**4. Comment:** “pg 39 and 40 - all clearcutting must be banned totally.”

**Response:** The National Forest Management Act (NFMA) permits clearcutting, seed tree cutting, shelterwood cutting and other cuts designed to regenerate even-aged stands of timber. The creation of early successional and regeneration habitat will move the South Pond Habitat Management Unit towards its Desired Future Condition since it will create regeneration age northern hardwood, paper birch-aspen and permanent wildlife openings.

**5. Comment:** “pg 41 - do not douse this area with toxic herbicides and pesticides, which poison the earth.”

**Response:** There is no reference on page 41 of the EA (or anywhere else in the document) that states that herbicides or pesticides will be used. We have no intention of using chemical application to control insect or disease within the Project Area.

**6. Comment:** “friends laughing at someone bothering to comment makes a lot of sense since the forest service NEVER LISTENS TO THE PUBLIC. THEY ISSUE THEIR CHOICES AND THEN CHOOSE THE CHOICE FOR THE EMPLOYEES. THEY GIVE NO CONSIDERATION AT ALL TO THE NATIONAL TAXPAYERS FUNDS THE PARKS AND KOWTOW TO LOCALS SOMEWHAT.”

**Response:** As state in the Appendix B- 24, comment #5 in the EA, we did listen to public comments for this project and created a new alternative to address public and Forest Service concerns. The scoping document is sent to individuals, abutters, educational institutions, state and federal agencies, conservation organizations, snowmobile clubs, and town and regional governments to solicit comment from a wide variety of interest groups. It is these comments that help us formulate our alternatives. All comments are given equal treatment irregardless of who writes them.

**7. Comment:** the bibliography is extremely obsolete. how can you plan for twenty years out when you are using 30 year old information as a basis for your estimates. you use very very old information. the environment of today is much much changed from 30 years ago.

**Response:** The reference material in the bibliography spans a period of 1964 to the present. We use the most current research available and in some cases, the most relevant research is from 20 to 30 years ago. The age of the research is irrelevant as long as it is still true and has not been disproven or refuted by more recent research. As for this analysis, approximately 8% of the data is from the 1960’s and 1970’s, 12% is from the 1980’s, 39% is from the 1990’s and 41% is from 2000 to present.

**8. Comment:** “Unsuitable lands should be mapped so that it will not be disturbed in the future.”

**Response:** Unsuitable lands are classified in our GIS database. During field reconnaissance, we verify that unsuitable lands are correctly classified in the database as well as identify lands that may require reclassification to unsuitable due to loggability or resource concerns. If lands in the data base are classified as unsuitable due to loggability, but in reality all or a portion of them can be logged without causing resource damage, they may be reclassified to suitable.

**9. Comment:** A camp owner along North Pond was concerned about noise levels generated by the harvest. Proposed postponing harvesting until September when visitor usage to the area was reduced.

**Response:** The reason for not postponing the season of operation until after Labor Day is that we do not want to limit the fall season of operations because the weather during the fall season can be very unpredictable. Typically August is one of the driest months and the weather can become wet from mid September through mid October.

There will be noise generated by logging equipment and chainsaws that will be heard by residents along North and South Pond. It is difficult to find noise studies in regard to logging, but a 1996 Noise Monitoring Study conducted for Grand Teton National Park in regard to snowmobiles and a noise study conducted by the Minnesota Pollution Control Agency found that sound levels for a point source decreased by 6 decibels (dB) per doubling of distance. For instance if a snowmobile generated 70 db at 50 feet, it is anticipated that it would generate 64 db at 100 feet , 58 dB at 200 feet and 52 dB at 400 feet.

Normal conversation produces between 60-70 dB. A chainsaw produces 110 dB. There are 6 stands (stands 6/9, 6/10, 6/13, 6/13a, 6/22 and 6/34) that are proposed for Summer/Fall/Winter harvest near North and South Pond. If the sound levels based on the above studies were applied to chainsaws instead of snowmobiles, the table below shows the sound ratings for a chainsaw. If more than one piece of equipment is used simultaneously, then the ratings will increase by 3 decibels. A change of 3 decibels is considered barely perceptible. It should be noted that trees and topography (ridges) will act as a sound buffer and reduce the noise levels carried across the pond.

**Table: Applied Sound Propagation Levels for Chainsaw**

| <b>Stand</b> | <b>Average distance from camps along North Pond to stand (feet)</b> | <b>Decibels (dB)</b> | <b>Equivalent Activity and Decibel levels (dB)</b>                    |
|--------------|---|----------------------|---|
| 6/34         | 1,400   | 83                   | Flush toilet (75-85 dB) or a power lawnmower (65-95).                 |
| 6/22         | 2,200   | 77                   | Flush toilet (75-85 dB) or a power lawnmower (65-95).                 |
| 6/10         | 3,100   | 74                   | Rural Highway traffic (60-70 dB) or a snowmobile at 20 mph (65-75 dB) |
| 6/13         | 4,300   | 72                   | Rural Highway traffic (60-70 dB) or a snowmobile at 20 mph (65-75 dB) |
| 6/9          | 5,400   | 70                   | Vacuum cleaner (60-85 dB) or normal conversation (60-70B)             |
| 6/13a        | 5,600   | 69                   | Vacuum cleaner (60-85 dB) or normal conversation (60-70B)             |

North and South Pond have over 50 camps in along its shores. It is not unusual to hear people talking, children playing, radios, vehicles, lawn mowers, other small motorized equipment and motorized boats. These sounds are in much closer proximity to camp owners and will be more prominent than sounds from the logging operation.

**10. Comment:** “I would like to see the EA and Final Decision include provisions for using this project as an Educational Format. As such, signage and ranger led field trips would educate and reassure the visiting public. The visual aspects of timber harvest will be extensive enough that appropriate education seems a natural for inclusion in the project. Raptor, migrating birds, moose watch and wildflower sites could easily be identified as the project nears completion.

**Response:** We agree that emphasis needs to be placed toward public education regarding vegetation management on the National Forests. The Conservation Education and Interpretive Services program on this Forest which is currently under development will identify key messages for priority resource areas including vegetation management and wildlife habitat creation and maintenance. Several media may be appropriate for conveying these messages including those suggested. Nothing in the decision or implementation of the project would preclude using the area for Conservation Education or Interpretive purposes.

In regard to forest management, we do conduct education tours of timber sales and other projects on the Forest. For instance we try on an annual basis to have a field trip for local newspaper and radio reporters. We invite high school students interested in natural resources to participate in timber layout, marking and sale administration. We also encourage Forest Service employees who work at the front desk to spend a several days with foresters so they can educate the public about forest management goals and objectives.

Though the effects of timber harvest will be visible following harvest, after two to three years the effects are minimized or unnoticeable as vegetation fills in the understory of uneven-aged harvest stands. The visual effects from clearcutting are longer-lasting, but most of the general public will not see the clearcutting or seed tree cut because they are not visible from hiking trails or from South and North Ponds. These cuts will be most noticeable for snowmobilers who are used to seeing these types of harvest (EA Section 3.14).

**11. Comment:** “I believe your agency is not taking into account large scale logging that is happening on the areas surrounding the White Mountain National Forest”

**Response:** We are aware of the increased amount of logging that has occurred on lands surrounding the Kilkenny Unit in recent years. The North Kilkenny EA discloses the cumulative effects (CE) analysis area that was defined for the each resource. The EA discloses the potential effects from past, present, and reasonable foreseeable future actions in the analysis area. For most resources, adjacent private lands are included in the analysis area.

**12. Comment:** “ While driving Route 110, look at all the areas that have been logged over, both within the National Forest and the surrounding areas. It is not very pretty.”

**Response:** In regard to the North Kilkenny project, visuals from route 110 were analyzed and the effects are documented in the Scenic Resource Section of the EA (Section 3.14). For this project, aside from road improvement (FR 2284 and FR 208), none of the proposed harvest will be visible from Route 110.