

September 20, 2025

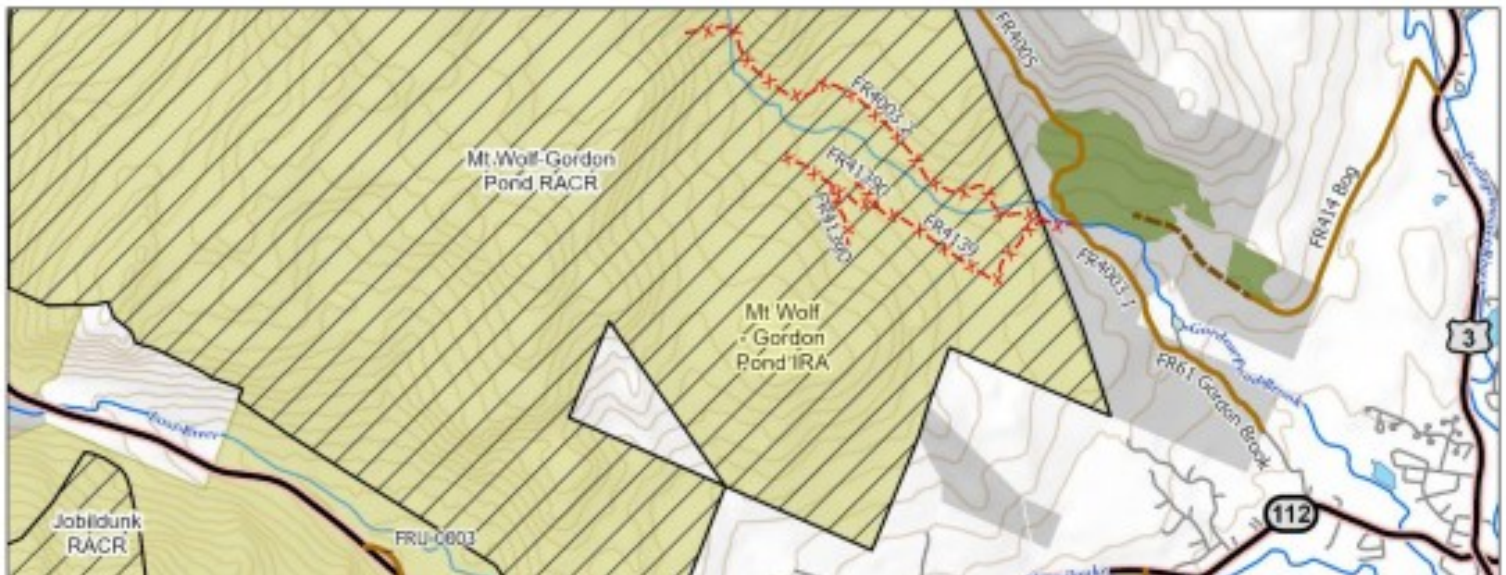
## Comment on the Forest Service's Lost River Logging and Clearcut Project

I repeat part of my comment of April 27, 2025:

“The scoping/comment process was designed to consume the time and hope of the small group of people aware of it while yielding no meaningful change in Forest Service plans. It is a deceitful passive-aggressive abuse of those opposed to any aspect of WMNF's Logging Projects.

To limit as much as possible this abuse, I oppose the Forest Service's “proposed” Lost River Logging Project by incorporating by reference the objections raised by Standing Trees and others to the Lake Tarleton and Peabody West Logging Projects and state my intent to support any legal action that may be brought against the Forest Service to eliminate/reduce this project.”

More than 91% of the Forest Service's planned logging in the Lost River Logging and Clearcut Project is within two Inventoried Roadless Areas; Mt. Wolf/Gordon Pond and Jobildunk. The Project map fails to label the Kinsman Roadless Area east of the X-178 powerline easement, in which a large clearcut is planned. Appendix C Inventoried Roadless Area Evaluations states, of the Kinsman Roadless Area: “The New Hampshire Public Service Company high voltage electric transmission line forms the southern boundary. The eastern boundary follows state-owned land along the Interstate-93 corridor and Franconia Notch State Park.” The grey area to the right of the Mt. Wolf/Gordon Pond Roadless Area is part of the Kinsman Roadless area. The straight-line boundary between them is the X-178 easement/powerline. The white area that abuts the grey area on the north is the Second Presidential State Forest, also unlabeled.



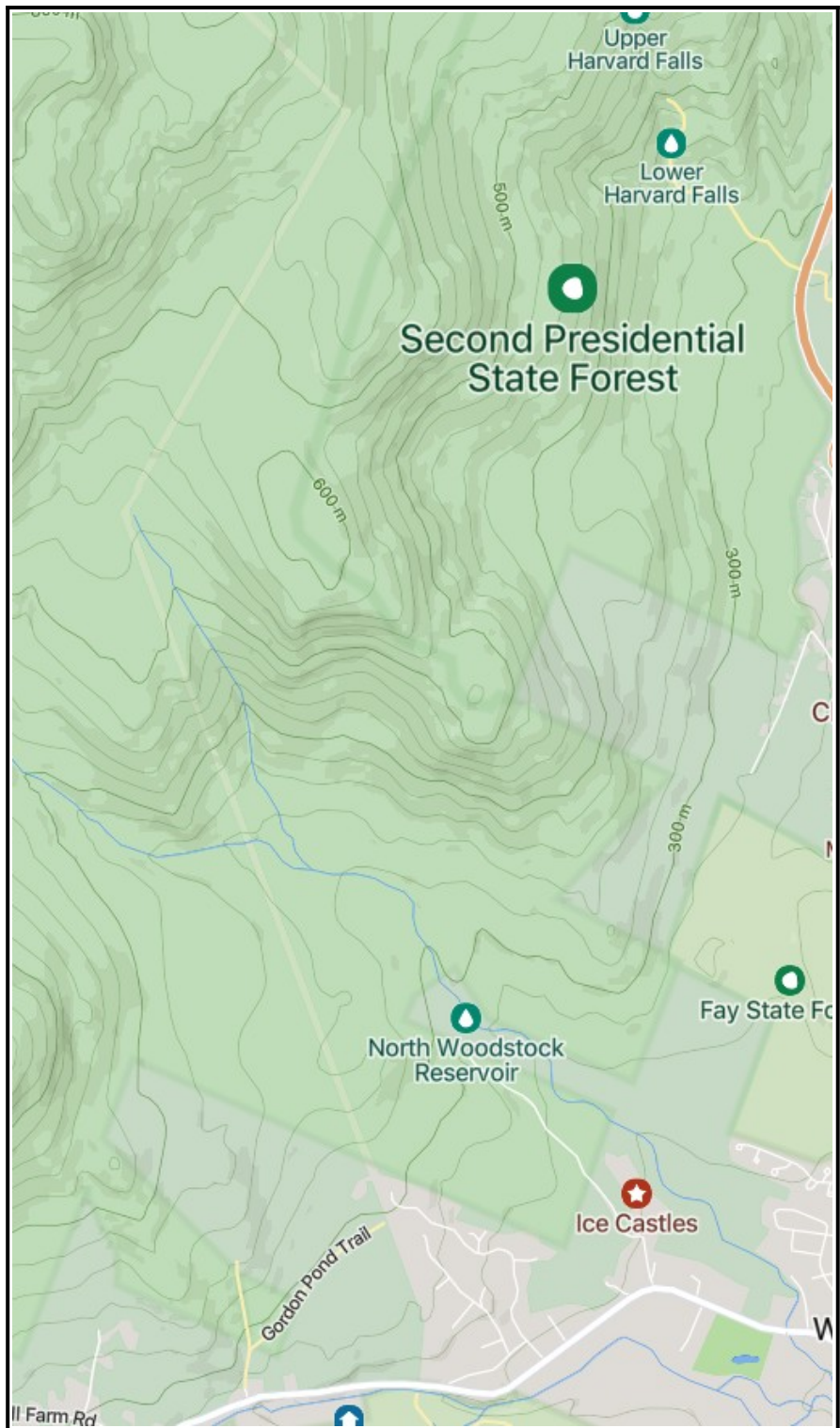
The boundary of the Second Presidential State Forest and Kinsman Roadless Area is a very faint darker green line running from the upper center of the map south then running east along the height of land to the Forest boundary.

The Lost River Project Roadless Area map is also wrong when it shows the grey peninsula south of the Kinsman Roadless area as outside the boundary of the Mt. Wolf/Gordon Pond Roadless Area. Appendix C Inventoried Roadless Area Evaluations states:

“The northeast boundary is along the Public Service powerline, the southern boundary is Route 112, and the western boundary is Route 116. The boundary follows either these cultural features or the Forest Property line.”

The Forest Service 2000 map of Roadless Areas is useless, failing to show details such as

Routes 116 and 112, and is also incorrect in its delineation of the Roadless Area boundaries for at least the Kinsman Roadless Area.



Combine this with the Forest Service’s plan to issue a Categorical Exclusion from NEPA review to Eversource’s planned rebuild of the X-178 transmission line and permit construction

of permanent heavy equipment roads on non-wetland areas along eight miles of easement that bounds and connects the Kinsman and Mt. Wolf/Gordon Pond Roadless areas, and widen and “upgrade” 6,300’ of the Half Track snowmobile trail in the Kinsman Roadless Area to a heavy equipment road which appears to run through the Kinsman Roadless area planned clearcut.

Logging and road-construction/”upgrading” should not be permitted in Roadless Areas.

The Lost River Logging and Clearcut project is likely to adversely affect the Northern Long Eared Bat.

As of April 24, 2025, Eversource’s X-178 project plans were not in compliance with USFWS requirements for protection of the Northern Long-Eared Bat. USFWS stated: “Please carefully review this letter. Your Endangered Species Act (Act) requirements are not complete.”

The Forest is permitting overlapping/cumulative damage projects that fail to protect the Northern Long-Eared Bat.

The Forest Service should revise its assessment of the Lost River Logging and Clearcut Project and produce an accurate analysis of its climate and carbon impacts as required by the National Environmental Policy Act.

The Forest Service also needs to produce an accurate analysis of climate and carbon impacts for Eversource’s X-178 project which overlaps the Lost River Logging and Clearcut Project. No assessment of CO2 impacts has been done for this project in WMNF. An assessment would include trucking of machinery, wetlands matting, gravel, rip-rap and structures to the X-178 easement/Special Use Permit areas of the in WMNF, machinery emissions, helicopter emissions and emissions associated with the mining and construction of the proposed new metal structures, Optical Ground Wire and conductors, and trucking and landfill emissions of trucking the existing wood poles to a landfill. The 40 years of lost use of the existing structures, conductor and ground wire also need to be part of this equation.

The Forest Service needs to provide a map showing the area of overlap of these two projects.

The Forest Service should respond its inadequate funding by using existing, accurate peer-reviewed data on logging, global warming and old growth forests rather than spending money creating its own studies. The Forest Service has a conflict of interest because certain Forest Service employees would lose their jobs if they produced evidence-based studies and followed their guidance.

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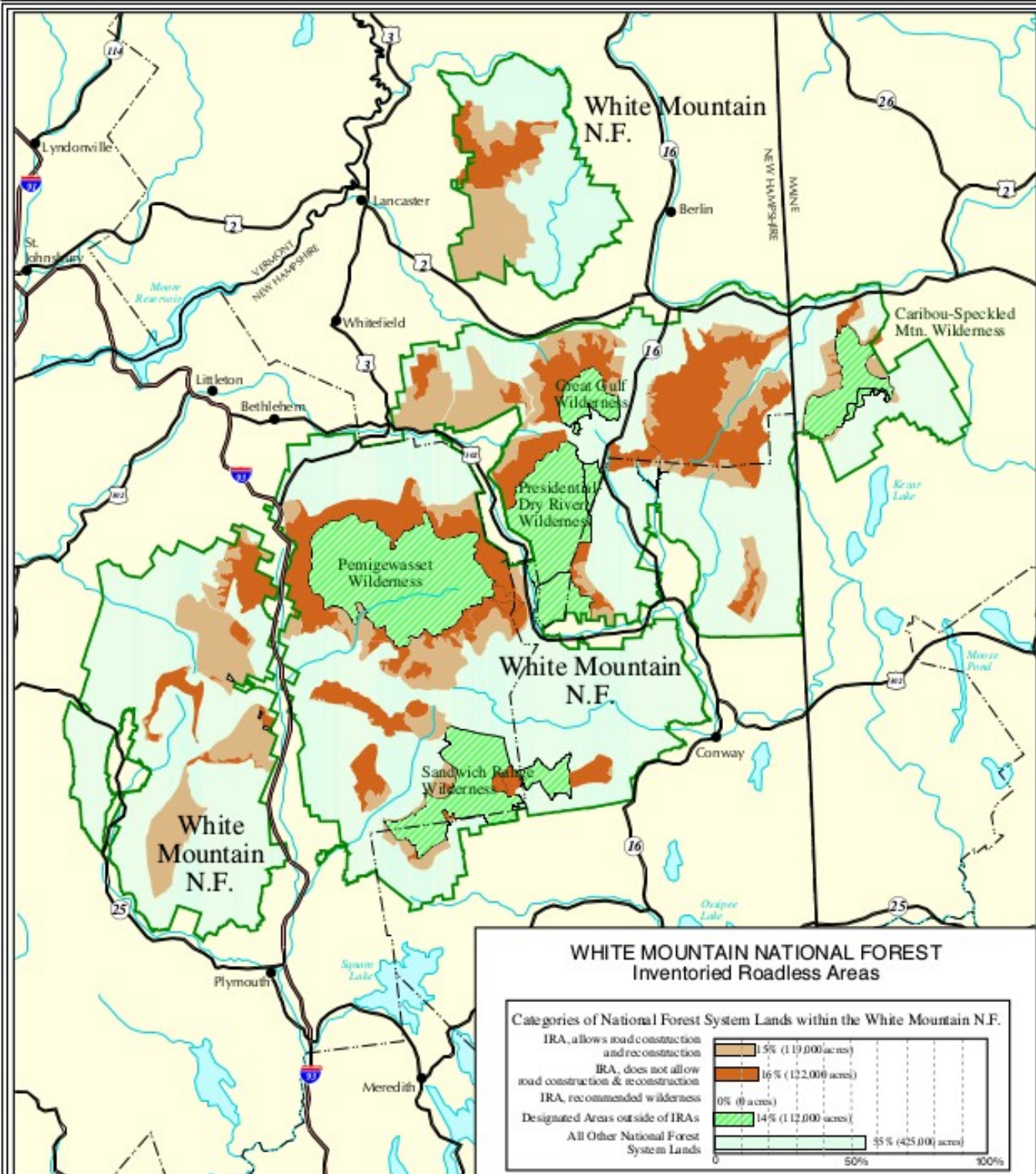




White Mountain National Forest Easton, NH, 2015 and 2019







SCALE in MILES

10 0 10 Miles

The USDA Forest Service uses the most current and complete data available. GIS data and product accuracy may vary. Using GIS products for purposes other than those for which they were intended may yield inaccurate or misleading results. The USDA Forest Service reserves the right to correct, update, modify, or replace GIS products without notification.

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- Inventoried Roadless Area where road construction or reconstruction is allowed
- Inventoried Roadless Area where road construction or reconstruction is not allowed
- Inventoried Roadless Area where road construction or reconstruction is not allowed, and the forest plan recommends as wilderness
- Designated Areas outside of Inventoried Roadless Areas
- National Forest System lands outside of Inventoried Roadless Areas - not all private land is shown on the map

Interstate Highway    Other Highways    County boundaries