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Jim Innes, District Ranger
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Dear Jim:

Thank you for the opportunity to Comment on the Sandwich Range Vegetation Management Project.

As you will see, my comments are arranged under three separate headings. The first heading, "Climate Change" is the longest, and in my opinion, the most important.

Doug McVicar

I. Climate Change.

President Biden has stated: "The United States and the world face a profound climate crisis. We have a narrow moment to pursue action at home and abroad in order to avoid the most catastrophic impacts of that crisis and to seize the opportunity that tackling climate change presents."

It is unfortunate -- and surprising -- that the "Notice of Proposed Action - Sandwich Vegetation Management Project" makes no reference to climate change. Work in the scientific community has produced estimates that "Natural Climate Solutions" -- by far the largest part of which involve forest management -- "can provide over one-third of the cost-effective climate mitigation needed between now and 2030 to stabilize warming below 2 degrees C." [Griscom et al., "Natural climate solutions", *Proceedings of the National Academy of Sciences* (2017) www.pnas.org/cgi/doi/10.1073/pnas.1710465114]

I appreciate your making *Forest Carbon Assessment for the White Mountain National Forest* (2019) available on the project website. This research is especially helpful since it address the WMNF specifically. While the authors make no recommendations, their data rings several alarms about the timber harvest described in the "Notice of Proposed Action". Specifically, Figure 9b is a graph showing that while net carbon sequestration peaks for various forest type groups at approximately 40 years, it continues at relatively high levels for up to 300 years. By stark contrast, newly sprouting seedlings and saplings don't reach the carbon sequestration production of even older trees that are past their peak for about 20 years. This twenty years is exactly the "narrow moment" the President refers to. This does not seem to be an appropriate time for human action that reduces the power of any part of our forest to sequester carbon.

In trying to understand the business-as-usual reasoning expressed in the "Notice of Proposed Action", as we stand face-to-face with "a profound climate crisis", I am drawn to the second sentence of that document: "We are proposing a combination of silvicultural and fuels treatments to advance goals, objectives, and desired conditions of the White Mountain National Forest Land and Management Plan (Forest Plan)." That forest plan is critically outdated, having been developed at the turn of the century, before there was full appreciation of the rapidity and violence with which climate change would advance. The Forest Plan is long and detailed, but it does not address climate change.

Various Presidential Executive orders direct federal agencies to "protect America's natural treasures, increase reforestation" [Executive Order 14008, sec. 214], "[Lead] the Nation on a firm path to net-zero emissions by 2050" [Executive Order 14057, sec 101], and "conserve America's mature and old-growth forests on Federal lands" [Executive Order 14072, sec 1].

Executive Order 14072 is exclusively devoted to forests. The order is entitled "Strengthening the Nation's Forests, Communities, and Local Economies", and Sec. 4 of the order is "Deploying Nature-Based Solutions to Tackle Climate Change and Enhance Resilience".

The Policy section of Executive Order 14072 states, "America's forests absorb more than 10 percent of annual United States economy-wide greenhouse gas emissions. Conserving old-growth and mature forests on Federal lands while supporting and advancing climate-smart forestry and sustainable forest products is critical to protecting these and other ecosystem services provided by those forests."

The Climate Change concerns above lead directly to a number of questions left unanswered by the published FS analysis of the Sandwich Vegetation Management Project:

What orders or policies of the USFS, the USDA, or other authority govern your response to climate change? Where can we get copies of those documents?

Have you received any communication from your leadership or their superiors in reference to the above cited Executive Orders? Have you received any directives addressing climate change? Have you received any directives addressing preservation of mature, or post-mature forests?

Do you have information on how executive orders and Department-wide directives will be implemented at the individual forest level?

Does the WMNF -- or higher authority governmental authority -- have a policy or legal opinion that because planning for the Sandwich Range Vegetation Management project began before a particular Executive Order, that it is therefore exempt from requirements of that order?

Does the USDA, the United States Forest Service, or the WMNF consider itself eligible under Section 602 "Exemption Authority" of the Executive Order 14057? If so does any exemption, or any part of any exemption, apply to the Sandwich Range Vegetation Management?

What methods do you use to gauge the carbon impact of your logging proposals? What are the primary scientific sources supporting these methods?

When you plan cutting with specific goals in mind, how far into the future are you planning? How many years ahead are you looking to achieve your stated goals from the current cutting planned in the Sandwich Range?

Do you agree with the forest carbon assessment for the WMNF produced by Dugan, Janowiak and McKinley (2019)? Have you asked them for specific cutting recommendations? If so, what did they say? Do you agree that their data as expressed in Figure 9b, leads to the conclusion that cutting in the WMNF will reduce the carbon sequestration capability of the forest for the next 20 years? If not, why not? What other sources of information do you have?

Have you made a calculation of the carbon emissions from logging operations, apart from the loss of trees and their intrinsic carbon sequestration capability? If not, why not? Are you aware of studies, such as Law et al., "Land use strategies to mitigate climate change", PNAS, 2018,

www.pnas.org/cgi/doi/10.1073/pnas.1720064115, which states "Harvest-related emissions should be quantified, as they are much larger than fire emission in the western United States."

If you did make this calculation, did your calculation include the carbon fuel expended in road building, site preparation, log landings, cutting, loading and transporting the timber? Did your calculation include carbon release from the brush, chips and slash which will rot or be burned? Did your calculation include the carbon release from fossil fuel to mill the timber, and the slabs and sawdust and other organic mill waste? Did your calculation include the carbon loss from soils?

Are you aware of scientific studies (such as Law et al, cited above) that have found that restricting harvest on public lands will increase net ecosystem carbon balance?

What are advantages and disadvantages of the cutting in the Sandwich Range you describe, compared to no cutting at all? What specific quantifiable benefits do you see for both the described cutting and not cutting? What quantifiable harms? If you were to include climate change, how would that affect this balance?

In the "Purpose and Need" section of the "Notice of Proposed Action", the first listed purpose is: "to provide a variety of high-quality timber products". Is harvesting in the WMNF necessary to meet the need for high-quality timber products? What evidence do you have that the need cannot be met by NH's private timber owners? What percentage of the forest products used in NH comes from outside of the state? Have you commissioned a market survey that might allow quantification of the need for timber products in comparison to other needs?

Where does the money raised by timber sales go? Is it spent within the WMNF? Is production of a certain dollar volume of timber sales required of the WMNF? If so, under what authority? What motivates timber operators to bid on WMNF timber sales? Why isn't timber on private land equally attractive? Are the WMNF timber cuts more profitable than those on private land? Again, have you done a market survey to support your pricing? If there is a market survey, can you and do you accept bids below the market price? Is there administrative pressure or quota-fulfillment pressure that have the effect of depressing prices? How much Forest Service expense will go into this sale as a percentage of the gross revenue? Are financial records available that would allow the public to make an independent review of these transactions? How do we apply for them?

More broadly, but within the scope of the above questions related to climate change, are there some records of FS activity that are not available to the public? If so, which documents and records or classes of document and records are restricted, and why? On the other hand, which documents and records, or classes of documents and records, are available, and how can members of the public view them?

II. Safe coexistence of timber harvesting and recreation

National Environmental Policy Act of 1969, Congressional declaration of purpose

"The purposes of this chapter are: To declare a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation . . . "

As described in the Notice of Proposed Action, the Sandwich Range Vegetation Management Project is likely to disrupt the "enjoyable harmony between man and his environment" in several ways.

Issues of safety are paramount. Traffic of heavy logging equipment and logging trucks through the Ferncroft parking area is a major concern. That parking area, recently expanded for the benefit of recreational visitors by local volunteers and WODC financing, can accommodate up to 50 cars parked at a time. The estimated number of annual visits is 3000 - 5000 cars, typically with two or more people per vehicle. So in summer, and on weekends during most of the year, vehicles are constantly coming and going, people walking, children and dogs cavorting. As the trucks pass over FS road 337 they will encounter -- and could present a hazard to -- hikers and skiers, as 337 and 337A are part of a number of popular routes, including two WODC trails -- the Gordon Path and the Kelley Trail -- and significant stretches of ski trails groomed by the Tamworth Outing Club that form connecting links in a larger system.

Protection of the environment through which the equipment will be passing is also a concern. Much of it is steep and subject to runoff. Most of the roads are narrow, have become overgrown, and currently support a rich growth of wildflowers, including several species of violets, trillium, lady slipper, and trout lily.

Part of the appeal of these WODC and other routes is the mature forest, beautiful in all seasons. In this area the stands of paper birch are particularly impressive. This species gave the area its 19th century name, Birch Intervale.

The Recreational, safety and aesthetic concerns above lead directly to a number of questions not fully answered by the published FS analysis of the Sandwich Vegetation Management Project:

Beyond the closure of one side of the Ferncroft parking lot, are additional safety measures to be part of the plan? For example, will there be a speed limit for trucks and other heavy equipment? If so, what would the FS consider a safe speed to be, and how will that speed limit be communicated to drivers and enforced? Is there a map of the plan to temporarily relocate hiking trails that coincide with skid/haul routes? Besides the planned signage, will blazing and treadway clearing be created to help hikers follow them in the summer, and skiers in the winter? The greatest activity on roads 337 and 337A probably occurs in the winter. Will there also be temporary relocation of ski trails? While operations are

ongoing, what will be the mechanism for communicating safety concerns from the public to the Forest Service and from the Forest Service to the operators and drivers?

The Notice of Proposed Action states that one purpose is to "provide a variety of recreation opportunities; and manage high-use or highly developed recreation areas to acceptable social and ecological standards." Does this mean there will be new recreational opportunities created? What sorts of new opportunities are contemplated? Or does "manage high-use . . . areas" mean some system for restricting previous levels of activity? Are there in fact any high-use areas in the Ferncroft (Map 2) area? Is the Ferncroft Parking Lot considered a high-use recreation area? If so, what might be done in that area?

Proposed action includes buffer zones for protection of wildlife and sensitive features such as vernal pools. Other than the described skid road crossing mitigations, will there be any buffers or other protections for the Cabin and Big Rock Cave Trails?

III. Community

"Look, the Society [for the Protection of New Hampshire Forests] has been fighting the Forest Service for years over even-aged management, and it has not been a cozy relationship. Clearcutting is a bureaucratic solution to a complex problem. When people see a clearcut on the hillside, they're naturally going to be upset." -- Paul Bofinger, quoted in Wilderness Winter 1982, page 26.

The Wonalancet community is drawn together by a single factor: we are all here because we love these mountains and our little valley in the midst of them. So we are very appreciative of the Forest Service and the beautiful forest environment that they work every day to preserve.

Years before the Forest Service was here, the Wonalancet community agitated against irresponsible logging, and shared the victory when the Weeks Act became law and the White Mountain National Forest was created. This community built the mountain trails, and has maintained them for more than a century. We drew the maps, wrote the guides, and hosted guests from the cities for decades. We made sure visitors could find a good place to park. When irresponsible logging attacked our mountains again in the late 20th century, we responded by leading the charge for Wilderness designation, and shared another victory.

There is no access to the National Forest in Wonalancet except via trails that cross private land. Wonalancet landowners not only built hiking trails across their land for the public, they frequently roll up their sleeves or reach deep into their pockets to maintain those trails. If hikers have lost their way, their phones, their pets -- or just need a bit of advice -- local residents are happy to help them out.

We feel that we are the guardians of these mountains, and do not appreciate "NIMBY" designation when we happen to disagree with the Forest Service. But if we can work together in a milieu of mutual respect -- respect by the community for the expertise of the Forest Service and respect by the Forest Service for the collective experience and wisdom of the community -- then our productive relationship, and mutual progress, can continue.
