

Sandwich Vegetation Management Project #57392, Saco Ranger District,
White Mountain National Forest

Jim Innes, District Ranger
USDA Forest Service Saco Ranger District
33 Kancamagus Highway
Conway, NH 03818

Dear Mr. Innes:

I can do no better than to echo many of the comments about the Sandwich Vegetation Management proposal already made by my friends and neighbors in Sandwich, Tamworth and Albany. Thank you for making the comments readily available on-line.

My wife and I have lived in Sandwich at the foot of the Sandwich Range for more than 20 years and have owned, and enjoyed, land here since 1989. In the early 2000's I was a member of the Friends of Sandwich Range and before that was on the Board of the Chapman Sanctuary. The missions of both of those organizations are intimately tied to land management issues that will be negatively impacted by your project. Because of my work with those organizations and as a concerned citizen of Sandwich and the Lakes Region I am outlining some of my objections to the project. Most of my comments simply support, and may supplement, comments made by others.

1. I do not believe that non-emergency vegetation management of the proposed type is of any significant value to society or, indeed, the forest as a whole. Much of the project area was proposed for inclusion in the Sandwich Wilderness during negotiations that led to the New England Wilderness Act of 2006. This area represents an opportunity to significantly expand the inclusion of lowland mixed forest in the Sandwich Wilderness. Expansion of the Wilderness is legislatively complicated and time consuming. Until it is done, however, it may be possible for the Forest Service to increase the level of protection by replacing the 2.1 designation with an appropriate 6.x Semi-Primitive management category.

2. Like many of the commenters, I am skeptical about the net monetary gain from commercial logging in any of the Eastern National Forests. I have been unable to find an analysis of the expense/income ratio for recent commercial timber sales in the WMNF similar to that publicized for sales in the Tongass Forest; but the billion or so dollars lost in those sales does not make me optimistic about what the ratio might be in the Whites. Of special concern is the loss of recreational and ecological potential by cultivating a tree farm on Federal land near millions of folks who are looking for forest recreation. This loss does not seem to be included on the expense side of the ledger.

The argument that we must somehow use National Forest resources as a direct subsidy of the forest products industry seems to me just one more example of federal support for a special interest group that has difficulty dealing with market fluctuations. Timber harvests on private land provide the majority of forest products in the East, and federal relief for market-induced unemployment in other sectors can be provided by more direct methods than cutting down trees.

3. A number of commenters have pointed out that an updated WMNF plan is now 3 years overdue. In fact, it appears that the Sandwich project was first proposed at about the time that a new plan should have been implemented, not just in the works. This alone would argue that the project should be discontinued until the public has an opportunity to work with the Forest Service to put in place an acceptable updated Forest Plan.

Attitudes about the environment have been altered by events and worries since the current management plan was implemented. I'm reminded of a specific incident that highlights how our thinking has changed in the last 20 years or so. At one of the several public hearings before the current plan was adopted, the topic of timber harvest projections over the following century came up. I recall specifically asking Tom Wagner, who was then the Forest Supervisor, whether he thought that climate change was likely to impact the yield of timber on the forest. His reply was that those working on the plan did not think that forest growth would be affected by climate change. I don't recall that any of us there followed up on that question or answer. I doubt if that would be the case now.

4. I am not a forest ecologist, but I do live in the forest just down the road from the Mt. Israel unit of the project. I fail to see any value at all in doing a prescribed burn adjacent to a local, frequently visited, bird sanctuary. Any change of vegetation induced by the burn would be trivial in extent compared to what we already have in the neighborhood on largely unmanaged private land. Furthermore, the eastern part of the Mt. Israel project lies along Forest Road 373, what we call the Tappan Trail. This is a road that was used during the last timber harvest in the area about 30 years ago. It also connects to one of the trails of the Chapman Sanctuary. The road and trails are regularly used for hiking and cross-country skiing. The overstory on many sections has recovered well since the last harvest and makes the walk especially nice on a summer day. All of these features of the road would be affected by the proposed operations in the area.

The bottom line about my comments: Don't carry out the Sandwich Vegetation Management Project!

Thank you for the opportunity to comment on your proposal.

Sincerely yours,

Ronald G. Lawler

