

Comment on: “Sandwich Vegetation Management Project Draft Environmental Assessment and Preliminary Finding of No Significant Impact” dated July 2023

By Ferncroft/Wonalancet area landowners abutting and near the White Mountain National Forest
August 30, 2023

We, the undersigned, are landowners and residents in the immediate vicinity of Ferncroft/Wonalancet. Several of us are direct abutters of the White Mountain National Forest. As area residents and stewards of properties near or adjacent to the proposed management project, we have a direct and immediate interest in the rationale for, conduct of, and ultimate outcomes of the proposed project. The body of our comments follows our signatures.

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The draft assessment raises many issues that we believe are either insufficiently addressed or addressed in ways that raise concern. Our concerns include:

Trails

Among us, we own the pre-National Forest sections of several major hiking trails, including the Blueberry Ledge Trail, the Dicey Mill Trail, the Wonalancet Range Trail, the Old Mast Road and the Bickford Trail. We are committed to preserving public access to these trails as gateways to public enjoyment of the riches of the National Forest. In that context, we are alarmed that the draft assessment includes no provision for buffer zones along the trails that cross or abut areas designated for major cutting operations. The absence of such buffers could lead to both unnecessary physical degradation of the trails themselves and degradation of visitor aesthetic experience of the trails. A trail buffer plan should be developed in consultation with the local community, particularly the Wonalancet Outdoor Club, which has played an exemplary role for over 100 years in citizen volunteer maintenance and support of the trail system.

The draft assessment does indicate that there will be substantial intersections between trails and logging skid trails and that some trails will have to be temporarily closed or relocated, but gives no details on the scale or duration of such major disruptions to the trail system. These issues too should be subject to consultation with the community.

Viewpoints

The discussion of impact on views is limited to just three viewpoints, said to have been chosen for “improved vantage and potentially higher visitation by the public relative to other potential viewpoints, as well as their overall representation of the full project area.” They appear to include two views from Mt. Katherine and a view from the peak of Chocorua. There is no substantive discussion of what would be seen from those points or the project impact on the aesthetics of the viewer experience. The omission of other prominent viewpoints, such as from Whiteface and various points on the Blueberry Ledge trail is inexplicable, as is failure to consider the panoramic view of the Sandwich range from Route 113A entering Wonalancet from Sandwich. The more senior among us remember well the conspicuous scars from the clearcuts in the last timber harvest that marred that panorama for decades pending regrowth. The issue of views should be revisited in more depth from more perspectives.

Traffic and Roads

The draft assessment specifically omits detailed analysis of roads, access and traffic. We think this is a serious omission. The comings and goings of hundreds of logging trucks will inevitably have negative impacts on the quality of life here in Ferncroft/Wonalancet. Two groups will bear the brunt: residents and National Forest visitors. The proposal to close half of the Ferncroft visitor parking lot during weekdays as a safety measure will have major repercussions. Even on weekdays the parking lot is often more than half full and there is no area accessible for spillover parking between the parking lot and the bridge on Ferncroft Road near Route 113A, which is a half mile away. We request that the Forest Service, in consultation with the community, develop a parking lot management plan that includes provision for notifying prospective hikers of the parking situation, providing both on-site and online information.

We are also concerned about maintenance of Ferncroft Road and the parking lot cutoff road. Most of Ferncroft Road is in the town of Albany, with a small portion just off Route 113A in the

town of Tamworth. It is a gravel road and already bears traffic disproportionate to the area population due to recreational hikers, sometimes hundreds daily, driving to and from the Ferncroft Parking Lot. We request that the Forest Service, in consultation with the local road agents, develop a plan to maintain all roads traversed by logging trucks in safe condition and good repair, with the Forest Service picking up costs of increased road maintenance due to truck traffic.

Invasive Plants and Animals

The draft assessment dismisses the possibility of important impacts from alien invasive species. We believe this matter deserves more than a perfunctory mention. Our casual observations note the local presence of several plants in this category, including Norway maple, barberry, Oriental bittersweet and Japanese knotweed. The latter two species are well established locally at nuisance levels and knotweed now occurs in large patches along the stream on the Brook Path in Wonalancet (our local trail, not to be confused with the Brook Trail on Mt. Chocorua). Both invasive bittersweet and knotweed thrive in disturbed open areas, like those created in logging operations. We note that these species are included as species of concern in the document “White Mountain National Forest Forest-wide Invasive Plant Control Project Decision Notice and Finding of No Significant Impact” issued January 2007. We ask that threats posed by these species for this operation be addressed.

We also note that there is provision for reseeded areas disturbed by logging skid trails and log landings. We ask that there be specific provision for reseeded with native species appropriate for the areas in question and specific safeguards against accidentally introducing invasive species in the process.

The draft assessment completely omits discussion of invasive insects. The Hemlock woolly adelgid poses a major threat to hemlocks, which are an important constituent of our local forests, and the Emerald ash borer is already attacking and killing our ash trees. The draft assessment anticipates growth of ash as an outcome of management activities, but in view of the ash borer threat, this may not be a likely outcome. The loss of hemlocks would be a major change to local ecosystems. Both of these issues should be addressed in the plan.

Fire Potential

The draft assessment specifically omits detailed consideration of the effects of the project on fire potential. We think this is shortsighted. The issue of increasing fire danger linked to climate change has come to the forefront of public concern over the past several years. This year, the major fires in Nova Scotia, in habitats not so different from ours, brought those concerns closer to home. We believe that an assessment of effects on fire potential, both in the short and long term, should be an important part of any plans developed now and ask that this be done.

Climate Change and Carbon

The net effects of the management plan on carbon balance are deemed to be negligible and inconsequential. This argument is unconvincing and unsubstantiated. For example, it is suggested that cutting will substantially affect only the above ground storage of carbon:

“The proposed action would largely be limited to carbon stocks stored in above ground live vegetation. Carbon stocks found in aboveground live vegetation comprise about 35 percent of the total ecosystem carbon stocks of the White Mountain National Forest (Dugan, Janowiak, and McKinley 2019). Ecosystem carbon stored in soils (approximately 39 percent in forests on the White Mountain National Forest) and other pools are not likely to be affected by the proposed action.”

This is demonstrably inaccurate. Most of the trees and shrubs in our forests are ectomycorrhizal, meaning that their roots are symbiotic with fungi that live on the photosynthetic products of the plants in exchange for providing them with nutrients, especially otherwise unavailable nitrogen. When the trees are cut, the ectomycorrhizal fungi, which comprise a substantial part of all soil carbon, die, to be replaced by other fungi, with profound consequences for the soil biota and structure, including carbon pools. Ectomycorrhizal trees in our forests include oaks, beeches, birches and all the conifers, which encompass a large majority of the forested area, all the more reason to include this issue in the analysis.

Whatever the immediate consequences for carbon balance, the report elides a bigger question. Should not the Forest Service, as a matter of national policy, engage in forest management that actively seeks to increase long-term carbon sequestration? Surely such a policy should be part of our national effort to stave off climate change caused by human-generated increases in atmospheric carbon dioxide. We ask that measures to increase long-term carbon sequestration be included in this plan. This is appropriate for an agency that is engaged for the long term.

We love our community and want to manage local forests, public and private, in ways conducive to preserving the land for our children’s children and those to come.