



Zack Porter &lt;zporter@standingtrees.org&gt;

---

## Questions re: Sandwich VMP

---

**Innes, James - FS, NH** <james.innes@usda.gov>

Thu, Aug 10, 2023 at 4:44 PM

To: Zack Porter &lt;zporter@standingtrees.org&gt;

Cc: "Corless, Theresa - FS, NH" &lt;theresa.corless@usda.gov&gt;, "Hall, Scott - FS, NH" &lt;scott.hall@usda.gov&gt;

Hi Zack,

If I understand your question correctly you would like to see the age data displayed spatially by harvest unit vs. what is displayed in in the HMU analysis. If we were to do that the majority of those stands in Appendix B would be classified as "mature" and the rest would be "young". What is important to understand is that the definition of age classes we use are for wildlife habitat. They are not silviculture definitions. There is also no connection to Executive Order 14072 either because we are still waiting on direction. The stands are uneven aged so therefore the age, which is determined by coring, are approximate. When we survey the HMU initially, we take out any stands that classify as old-growth or have any old-growth characteristics, therefore you would not find those in the data. We don't disclose old-growth locations because we don't want the habitat disturbed. I understand the Green Mountain displays the data differently, but they also operate under a different Forest Plan. So, to conclude, the age class table in the HMU analysis is the most meaningful data we have on stand age.

Sincerely,

Jim

**Jim Innes**  
District Ranger**Forest Service****Saco Ranger District, White Mountain National Forest**

p: 603-447-5448 x5102

c: 603-520-2321

[james.innes@usda.gov](mailto:james.innes@usda.gov)33 Kancamagus Highway  
Conway, NH 03818[www.fs.fed.us](http://www.fs.fed.us)**Caring for the land and serving people**

---

**From:** Zack Porter <zporter@standingtrees.org>  
**Sent:** Wednesday, 9 August, 2023 11:17 AM  
**To:** Innes, James - FS, NH <james.innes@usda.gov>  
**Cc:** Corless, Theresa - FS, NH <theresa.corless@usda.gov>; Hall, Scott - FS, NH <scott.hall@usda.gov>  
**Subject:** Re: [External Email]Re: Questions re: Sandwich VMP

Thanks, Jim, for those responses and for your concern about the flooding that we've had over here.

The Sandwich VMP Draft EA says that 76% of the forest in the HMU is in the mature age class, and 24% is in the young age class. However, the public can't determine where the mature forest is located, where the young forest is located, and what ages the stands are that are proposed for harvest or prescribed burns. The Forest Service must know the ages of these stands or it would not be able to categorize them in the table in the HMU Rationale on page 4. If a table or map of stand age classes does not exist, I am asking the WMNF, as politely as possible, to please create a table and/or map. At a minimum, the table in Appendix B of the Draft EA ("Proposed Vegetation Management and Seasons of Harvest") could simply be updated with one additional column indicating the stand age.

What percentage of the HMU is in the old age class? The old age class is not shown on the table in the HMU Rationale on page 4.

To be clear, this is not unusual information for the Forest Service to share: the Green Mountain National Forest has provided stand age-class maps and stand age-class tables for every project in the past several years (going back at least to 2019 if not earlier). I have never needed to request the information - the GMNF provides this information up front. The same can be said for maps that depict harvest units overlaid on Forest Plan management area boundaries.

This hardly seems like an unusual or burdensome request, since such information has to inform the management decision that you will make. How can the Forest Service be sure that its proposal falls within the bounds of what is allowed in the Forest Plan if it doesn't know the age of the stands that it will be harvesting, or if it does not know which management area the proposed actions are located within or are adjacent to? And if the Forest Service doesn't know, how can the public know?

Thanks for your consideration,

Zack

On Wed, Aug 9, 2023 at 9:21 AM Innes, James - FS, NH <james.innes@usda.gov> wrote:

Hi Zack, Hope your doing well. I imagine the flooding up your way has made things difficult. I answered your questions in blue below.

Thanks, Jim

On Tue, Aug 8, 2023 at 1:57 PM Zack Porter <zporter@standingtrees.org> wrote:

Hi Jim, Theresa, and Scott,

I hope you're doing well. Thanks for the notification about the Sandwich VMP Draft EA comment period. I have some questions that I would be grateful for your help with.

- It looks like the comment period runs through 11:59:59 on August 31. Do I have that right? If not, can you share the correct date?

The comment period ends on August 30 at 11:59:59 pm, not August 31.

- Is there an email inbox where comments can be submitted in addition to submitting via the project website?

There is not an inbox. Its best if you can submit your comments and upload any documents through the project website. Please don't send a thumb drive because we aren't allowed to use them with our computers.

- I don't see any public meetings scheduled. Are there any meetings or outings under consideration?

We had two public meetings, one in January of 2020 and the other in June of 2022 with no additional meetings planned.

- Could you please share a stand age class map for the project area as well as a table of stand ages?

We do not have a stand age table or map.

- Could you please share a map of the project area that overlays proposed management actions with the boundaries of roadless areas (2001 RACR IRAs and 2006 Forest Plan Inventoried Roadless) within the project area (even if management actions are not proposed to take place within the boundaries of these areas)?

We do not have a map that displays the management area and the IRA's and RACR.

- The Biological Evaluation says that "The northern long-eared bat has been documented throughout the White Mountain National Forest. Roosting and foraging habitat does exist within the action area. Presence of the bat is assumed, as suitable roosting habitat is abundant and available" (page 10). The Biological Evaluation also says no acoustic surveys were done to look for NLEB in the Sandwich VMP project area. The Biological Evaluation does not specifically reference *any* surveys (that I could tell) for NLEB in the Sandwich VMP project area. Am I correct that no surveys have ever been done in the Sandwich VMP project area?

We assumed presence of the NLEB as is explained in the Biological Evaluation, therefore we did not conduct any surveys.

- The Biological Evaluation says that there are no known NLEB hibernacula. Are there any known maternity roost sites in the project area?

Correct, there are no known roosts or maternity sites.

Thanks for your help with these questions. Please reach out if my questions need clarification.

Zack

--

Zack Porter

**Executive Director, Standing Trees**

*he/him/his*

Montpelier, VT

802.552.0160

[zporter@standingtrees.org](mailto:zporter@standingtrees.org)

*Standing Trees works to protect and restore forests on New England's public lands.*

--

Zack Porter

**Executive Director, Standing Trees**

*he/him/his*

Montpelier, VT

802.552.0160

[zporter@standingtrees.org](mailto:zporter@standingtrees.org)

*Standing Trees works to protect and restore forests on New England's public lands.*

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

--

Zack Porter

**Executive Director, Standing Trees**

*he/him/his*

Montpelier, VT

802.552.0160

[zporter@standingtrees.org](mailto:zporter@standingtrees.org)

*Standing Trees works to protect and restore forests on New England's public lands.*