

August 30, 2023

REFERENCE: Sandwich Vegetation Management Project Draft Environmental Assessment and Preliminary Finding of No Significant Impact

To Whom it May Concern:

I am writing regarding the Sandwich Vegetation Management Project Draft Environmental Assessment (EA). The EA is a cookie cutter approach to a proposed action that has generated much discussion and concern in the nearby and surrounding communities. There are not enough details or explicit analysis and current references in the EA for residents to make informed decisions about the proposed action, or for an adequate environmental impacts assessment. A revised Draft EA and FONSI is required.

It appears that none of the scoping comments were addressed in the Draft EA. The purpose of scoping is to shape the proposed action through discussion, and to use the scoping comments to shape the EA itself. That was not done. Your own document (*Sandwich Vegetation Management Project – Scoping Comment Report*, Sept. 2022) states that “Scoping comments are used to help the project planning team refine the proposed action, evaluate potential alternatives, identify relevant issues for analysis, develop project design elements or other mitigation measures, and refine the environmental analysis.” It appears that most of the scoping comments were ignored and people who took the time to attend public meetings and submit scoping comments had no input, in the end, to the proposed action. A few examples are these scoping comments: comments requested more informative detailed maps, including stand age maps; comments concerning impacts to the Abenaki community; comments concerning bear dens in the Ferncroft project area; comments on the northern long-eared bat, the last of which was addressed perfunctorily.

EAs are required to consider alternatives to accomplish the purpose and address the need, but there were no alternatives, apart from the No Action alternative, or alternatives proposed and discarded. Were any other actions considered before this one proposed action?

The EA did not address the Migratory Bird Treaty Act of 1918. Please revise this draft and include impacts to bird species from the proposed action.

Many of the analyses are not explicit and do not provide data to back up conclusions. For example, in Appendix A, Heritage, one sentence states that ‘Cultural sites shall be avoided.’ But the next sentence states what would happen if they cannot be avoided. Similarly, under Wildlife, the text states that should any listed species be found prior to implementation, mitigation measures would occur. But there is no discussion of what the mitigation measures will be. Earlier in the document, the discussion of Endangered Wildlife on page 34 concludes that “there may be indirect beneficial effects to foraging habitat from the creation of new roads and trails, including skid trails...” But there is no analysis. The reader doesn’t know why there would be indirect beneficial effects.

In sum, the Draft EA requires much more detail, more specific maps, and more explicit analysis of impacts that would lead to a conclusion of no significant impacts. Please publish a revised Draft EA to support a FONSI.

Thank you,
Paula Bienenfeld