
Objection to the Sandwich Vegetation Management Project #57392 - Draft Decision Notice

Objections

Actual Text of WMNF Response to Previous Comments in the official Project Record OR Planning Rules; followed by this objector's objection

The Environmental Assessment (EA) and the Draft Decision are solely based on Long term vs Short term Impacts

“The proposed harvest treatments, prescribed burning, wildlife openings, and transportation management activities would result in a **short-term increase** in the amount of **non-detrimental soil erosion, compaction, and nutrient cycling** in the project area (Sandwich Soils Report 2023)”

What is non-detrimental soil erosion, compaction and nutrient cycling ?

“Management proposed in the Sandwich Project can be expected to have **short term carbon emissions**, and also maintain the Forest as a **net carbon sink in the long term.**”

Scientists deliver ‘final warning’ on climate crisis: act now or it’s too late (the Guardian)

This article is more than 1 year old (20 March, 2023)

IPCC report says only swift and drastic action can avert irrevocable damage to world

Scientists have delivered a “final warning” on the climate crisis, as rising greenhouse gas emissions push the world to the brink of irrevocable damage that only swift and drastic action can avert.

The Intergovernmental Panel on Climate Change (IPCC), made up of the world’s leading climate scientists, set out the [final part of its mammoth sixth assessment report](#) on Monday.

The comprehensive review of human knowledge of the climate crisis took hundreds of scientists eight years to compile and runs to thousands of pages, but boiled down to one message: act now, or it will be too late.

The UN secretary general, António Guterres, said: “This report is a clarion call to **massively fast-track climate efforts by every country and every sector and on every timeframe. Our world needs climate action on all fronts: everything, everywhere, all at once.**”

We must act NOW because we don’t have time to see the long term benefits of short term losses.

The EA and the Draft Decision are both restricted to Site Specific Impacts while ignoring regional and global effects

“Controversy relates to scientific controversy, not social controversy. In all submitted articles by commenters they claim refute the project purpose and need **are not comparable due to the articles studying a different ecosystem in a different part of the country or in some cases a different country** altogether, **or articles that refer to actions on private land that do not adhere to the same laws and regulations as the U.S. Forest Service.**”

“Effects on soil carbon are generally small and transient (Nave et al, 2010). Submitted articles reference soil **studies from varied locations .which are not applicable to soil types or project activities in the project area.**”

Executive Order (EO) 14072 specifically orders actions necessitated by climate change and global warming. The EO does not order the preservation and promotion of mature and old-growth trees because they are pretty to look at.....But because they sequester large amounts of carbon.....not just for the benefit of the Sandwich Vegetation Management Project. Site Specific impacts have always been a red herring used by the Forest Service to minimize the negative effects of logging....But, at long last, the EO and consequent agency wide old-growth Forest Plan should shift Forest Service outlook and actions toward a global perspective. Do not cut the trees before the new rules are in place.

The Use of Fire is unnecessary and dangerous in New Hampshire

Executive Order (EO) 14072–Strengthening the Nation’s Forests, Communities, and Local Economies–instructed the U.S. Department of the Interior, Bureau of Land Management (BLM) and U.S. Department of Agriculture (USDA), Forest Service to implement a set of actions focused on the health of the Nation’s forests. Section 2.c.(ii) directed the agencies to analyze the **threats to mature and old-growth forests** on Federal lands, including from **wildfires** and climate change. That analysis revealed that the **WMNF has very low exposure to expected wildfires.**

The “No Action” alternative is not adequately addressed

“The project was developed to address issues in the Habitat Management Unit as directed by the Forest Plan, to fully evaluate the consequences of not taking action, the area would have to be left to further **deteriorate** and **research would be necessary** which is **not required by the Forest Plan or other policy.**”

There is **no evidence available from any source, even from the Forest Service, that an unmanaged forest will deteriorate. Of course, research was and is required to produce even an EA, with or without a “No Action” alternative.**

In the words of the Responsible Official “While **taking no action would allow the natural successional processes to continue**, it would not address the issues identified by the IDT following the goals and objectives of the forest plan for which I am charged to implement. Therefore, taking no action would not meet the need for the project. The proposed action will have minimal impact on the environment and will benefit multiple resources.”

The current Forest Plan upon which this Decision is based, is outdated and will shortly be amended by the Forest Service. Therefore, the basis for the rejection of a “No Action” alternative, namely the current Forest Plan, is not applicable.

The “No Action” alternative is the only logical action in light of the following: Old Growth Amendment “The Forest Service is currently working through the National Environmental Policy Act process to develop an Environmental Impact Statement. The National Old-Growth

Amendment is the first-of-its kind proposal to amend all 128 forest land management plans. The proposed amendment is intended to provide consistent direction to conserve and steward old-growth forest conditions in response to rapidly changing climate conditions. The National Old-Growth Amendment process is anticipated to be **completed in early 2025** following intensive public scoping and analysis of comments. A draft Environmental Impact Statement is slated for completion **this summer**. Input from a wide variety of audiences will help inform the effects analysis and decision-making process. Analysis and consideration of [input](#) from the initial scoping period, which closed Feb. 2, 2024, are **currently underway.**”

The “Finding of No Significant Impact”(FONSI) is not justified by the facts A 2023 [threat analysis](#) of mature and old-growth forests on National Forest System and Bureau of Land Management lands suggests that **“current management activities may not be responsive to rapidly changing disturbances and conditions that threaten old-growth forests.”** “American forests are entering uncharted territory with climate change. As our understanding of the implications of climate change evolves, so will understanding the places and methods to best steward and conserve our Nation’s older forests. **In the meantime, existing younger and mature forests provide the building blocks for future mature and old growth.** A sound management approach will help ensure that older forest species composition and structure fits its environment (such as future fire patterns, climate, and locations least likely to burn). A deep understanding of ecological, social, and cultural dynamics must play a role. **Most importantly, the environment of the predicted future, and not that of the past, should guide policy considerations related to mature and old-growth management.”**

The Forest Plan needs to be and can be “Amended”
by the Responsible Official

Forest Plan Amendment (when)

- Monitoring results suggest a need to change the desired forest condition or projected timber outputs.

- A need to change the plan is identified that cannot be made through administrative changes (36 CFR 219.13) or by changing management practices rather than plan components.

- The Responsible Official may rely on a monitoring report **or other documentation of new information, changed conditions, or changed circumstances to identify a need to change the plan**

(36 CFR 219.13(b))

- A plan amendment is required to add, modify, or remove one or more plan components, or to change how or where one or more plan components apply to all or part of the plan area (including management areas or geographic areas).

- (e) Plan components. Plan components guide future project and activity decision making. The following plan components are required (36 CFR 219.7): desired conditions, objectives, standards, guidelines, and suitability of lands. Goals may be included as an optional plan component.

- **Plan amendments may be broad or narrow, depending on the need for change, and should be used to keep plans current and help units adapt to new information or changing conditions.**

- Base an amendment on a preliminary identification of the need to change the plan. The preliminary identification of the need to change the plan may be based on a new assessment; a monitoring report; or other documentation of new information, changed conditions, or changed circumstances.
