Forest Service
U.S. DEPARTMENT OF AGRICULTURE

White Mountain National Forest, Saco Ranger District | February 2024

Sandwich Vegetation Management Project

Comment Period Consideration Summary
For the
Draft Environmental Assessment

Contents

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Introduction

This document provides a summary of comments received during both 30-day comment periods that were conducted for the draft environmental assessment and preliminary finding of no significant impact for the proposed project, as well as a summary of public involvement to date.

Summary of Public Involvement to Date

In January 2020, Saco Ranger District of the White Mountain National Forest announced the upcoming Sandwich Vegetation Management Project by publishing information about the project on the Forest Service Schedule of Proposed Actions for the White Mountain National Forest[1]. To introduce the project to the community, we held a pre-scoping open house on January 28, 2020, in Center Sandwich, New Hampshire. The open house was advertised on flyers posted around the community, an announcement was published in the *New Hampshire Union Leader* and shared on the Sandwich town website, and the open house invite was mailed to 108 interested parties and emailed to an additional 406 individuals. Sixty-eight people attended the open house, where they received preliminary information about the project and resource specialists from Saco Ranger District were available to answer questions.

We initiated scoping for the project on June 6, 2022, with a notice of proposed action and request for comments to be submitted by July 7, 2022. Using mail and email, we sent the notice to 614 interested parties and posted the notice on the Forest Service Sandwich Vegetation Management Project webpage[2]. A legal notice was published in the *New Hampshire Union Leader* on June 7, 2022, announcing the notice of proposed action, request for comments, and a public meeting. The public meeting was held virtually via Microsoft Teams on June 23, 2022, from 6:30 to 8:00 pm; twenty-one people attended the virtual public meeting. After the meeting, we posted to the project website all of the information presented at the meeting and a summary of questions and answers. We received 29 unique comment letters from the public and interested parties who attended the meeting. The comments received were compiled in a summary that was shared on the project webpage on October 3, 2022.

We initiated a comment period for the draft environmental analysis and preliminary finding of no significant impact for the project on July 31, 2022, with a requirement for comments to be submitted by August 30, 2023. Using mail and email, we sent the notice to 498 interested parties and posted the notice on the Forest Service Sandwich Vegetation Management Project webpage. A legal notice was published in the *New Hampshire Union Leader* on July 31, 2022, announcing the comment period and availability of the documents. We received 379 unique comment letters from the public and interested parties via hardcopy, email, and from the direct project comment page[3] generated by CARA[4], the Forest Service's application for receiving comments on projects.

Due to issues with comment submission through CARA, we held a second 30-day comment period on the draft environmental analysis and preliminary finding of no significant impact for the project. We announced the second comment period in advance of it beginning through a press release on September 7, 2023. The press release was also shared with local groups for distribution through their channels. Included in the press release was an invitation to a field tour with the project team to see the area firsthand and ask questions. A legal notice was published in the *New Hampshire Union Leader* and the *Conway Daily Sun* on September 20, 2023, announcing the comment period, availability of the documents, and requesting comments by October 23, 2023. Using email, we sent the notice to 684 interested parties and posted the notice on the Forest Service Sandwich Vegetation Management Project webpage. Members of the project team and 65 interested parties attended the field trip on September 24, 2023. We received 187 unique comment letters from the public and interested parties via hardcopy, email, and from the direct project comment page.

[1] SOPA link-https://www.fs.usda.gov/sopa/forest-level.php?110922
[2] Project webpage link-https://www.fs.usda.gov/project/whitemountain/?project=57392
[3] Comment on Project link- https://cara.fs2c.usda.gov/Public//CommentInput?Project=57392
[4] CARA=Comment Analysis and Response Application

In addition to the field trip and the two comment periods for the draft environmental analysis and preliminary finding of no significant impact, the responsible official Jim Innes, Saco District Ranger and project team members have attended 10 different meetings with the Board of Selectmen from Sandwich and Tamworth, residents, and clubs.

Next Steps

Comments are used to help the project team refine the proposed action, evaluate potential alternatives, identify relevant issues for analysis, develop project design elements or other minimization measures, and refine the environmental analysis.

The project team will complete the final EA and FONSI and develop the draft decision notice for the Sandwich Vegetation Management Project. A 45-day objection period for the draft decision notice is planned to be held in early 2024. Parties that that submitted comments during a designated public comment period (e.g., either the scoping or during either 30-day draft EA comment period) are eligible to object. For additional requirements regarding the objection period, refer to the legal notice for the draft EA 30-day comment periods.

Summary of Comments Received

The remainder of this document consists of a series of tables that provide a representative summary of the range of comments received during the both 30-day comment periods, organized by general resource area or topic. This summary provides a broad overview of the range of comments received and is not intended to represent specific, individual comments. Individual comment letters can be viewed in the project reading room[5]. There were a large number of both support and opposition comments, these were considered by topic and are not represented in their own table. References listed in the "Consideration of Comments" are included in the environmental assessment or supporting documents and aren't duplicated in this document.

To aid in navigating to specific sections, the topics are linked below.

List of Abbreviations used in this Summary

- BE Biological Evaluation
- BMP Best management practice
- CFR Code of Federal Regulations
- CEQ Council on Environmental Quality
- EA Environmental Assessment
- EIS Environmental Impact Statement
- FONSI Finding of no significant impact
- FP Forest Plan
- HMU Habitat Management Unit
- IRP Integrated resource project
- MA Management Area
- NEPA National Environmental Policy Act
- NLEB Northern long eared bat
- VMP Vegetation management project
- WMNF White Mountain National Forest

[5] Project reading room link- https://cara.fs2c.usda.gov/Public//ReadingRoom?Project=57392

Table 1. Summary of Comments Received Relative to NEPA.

Summarized Comments	Consideration of Comments
The Sandwich project does not have an adequate range of alternatives, including a no-action alternative.	Commenters suggest that the Forest Service consider a "range of alternatives". However, commenters do not propose an alternative to the proposed action or provide any specific deficiencies with the existing analysis in the EA and project record. Per 36 CFR 220.7(b) “The EA shall briefly describe the proposed action and alternative(s) that meet the need for action. No specific number of alternatives is required or prescribed.” No further response required as commenters do not provide substantive, actionable issues related to the project. Comments are general in nature. The consequences of not taking action are described in the EA, the Project Soils Report, and the BE. 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.
Project impacts will be significant and warrant the preparation of an Environmental Impact Statement.	The EA and the project record provide the responsible official with the information necessary to make an informed decision regarding the proposed project. Consistent with NEPA implementation regulation, the responsible official may prepare a finding of no significant impact (FONSI), if appropriate. If the responsible official determines that preparation of an EIS is warranted, the Forest Service would follow applicable NEPA implementing regulations for that level of analysis, including publication of a Notice of Intent in the Federal Register. The Sandwich VMP EA and preliminary FONSI are consistent with the Forest Plan and the CEQ and Forest Service NEPA implementing regulations.
The forest should consider the environmental impacts of the project.	NEPA requires that federal agencies consider and disclose the potential effects of their actions on the human environment, as well as ensure compliance with other applicable environmental laws and regulations including the National Historic Preservation Act and the Endangered Species Act. The Environmental Assessment discloses the potential environmental impacts resulting from the proposed action.
Previous comment periods have gone unacknowledged and unaddressed.	Federal agencies may address comments by modifying the proposed action, considering or adding alternatives, refining the environmental analysis, making factual corrections, or otherwise improving the analysis (40 CFR 1503.4). For an EA, there is not a requirement to provide a public response to comments. The Saco Ranger District posted a comment summary report to the project website in October 2021. All comments must be considered by the responsible official (36 CFR 218.25 (b)). The WMNF has responded to public comments to date by adding the additional comment period for the draft environmental assessment, adding project design criteria RE-8 which describes a minimum 66-foot no-cut buffer on trails that pass-through group selection cuts, added detail to the scenery effects report, updated the Forest Carbon Assessment for the White Mountain National Forest in the Forest Service’s Eastern Region White Paper 2024 (Forest Carbon White Paper) and Sandwich VMP Carbon and Greenhouse Gas Emissions Assessment (Project Carbon Assessment), updated the maps, and refined the units and prescriptions. These are described in greater detail in the EA on pages 7 and 8.
The cumulative effects analysis is insufficient in spatial boundaries. Spatial boundaries should extend far beyond project area to be adequate, and the forest did not take into account climate change.	Spatial and temporal boundaries vary by resource and are recorded in the project record. Due to the scale and scope of the project, effects to climate change were determined to be minimal (see soils/carbon/climate section). The Forest Service will follow Forest Plan direction, all national core and state best management practices, and project specific design features in the EA to minimize effects to the human environment.

Summarized Comments	Consideration of Comments
Why were different buffers used for different areas of the project?	All vegetation management activities in the project area are within MA 2.1 General Forest land which does not require trail buffers, as such the proposed action does not include a set trail buffer. Rather, the trail buffers are at the discretion of the Responsible Official. Based on collaboration with stakeholders, project design criteria RE-8 was added which describes a minimum 66-foot no-cut buffer on trails that pass-through group selection cuts. Other resource buffers around the project area, for example riparian buffers, are in place to ensure the conservation of different resources with different needs and sensitivities.
Finding of no Significant Impact (FONSI) - forest analyzed effects on forest-level only and that was only reason the forest was able to come to a FONSI. Should have looked at proper scale based on resource effects.	Context and intensity were taken into account for the local area and the forest as a whole. As stated in the EA on page 28, the project would occur over an area totaling less than about one percent of the total acreage within the WMNF. Management actions are anticipated to begin in summer 2024 continuing over a 5- to 10-year period. Based on consideration of past projects, the project is a continuation of similar types of management actions that have occurred for the past 19 years under the current Forest Plan. The total proposed acreage to be harvested is less than 638 acres, which may not be the total treated amount during implementation, it may be less. To compare the most recent similar projects within the Saco District, the Cold River IRP-1,047 acres and North Chatham IRP-1,497 acres projects both have treated or are in the process of treating larger areas than the Sandwich Project. These projects are all similar in activity and scope, and have not shown to have significant effects on the human environment due to the forest service following Forest Plan direction, national core and state best management practices, and project specific design features listed in the EA. Moreover, the project would be conducted over a 5- to 10-year period, so effects would be spread out temporally. Due to these factors, the interdisciplinary team did not find any adverse effects likely to be significant that would warrant further analysis in an Environmental Impact Statement.
FONSI - FONSI inappropriate due to effects to effects to the newly uplisted NLEB.	For effects to the NLEB, refer to the wildlife section below.
FONSI - commenter disagrees that project is not highly controversial.	Controversy relates to scientific controversy, not social controversy. 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. The Forest Service has considered the proposed action and all potential effects based on the best science available. The WMNF uses multiple tools to determine whether the project goals and objectives were met, including stand exams post implementation and monitoring.
The online comment submission form through the project website is difficult to use.	The online comment system enables the Forest Service to better analyze comments submitted. Commenters using the online commenting form have the option to attach other documents along with their comment. In the case that the document they wish to submit exceeds the online submission form's capacity, commenters can always send the responsible official the documents directly, by email attachment or hardcopy mailing. Commenters also have the option to submit comments via mail. Commenters expressed issues with the comment system during the first 30-day comment period on the draft EA. When asked what issues they encountered, none responded. However, due to commenter issues with comment submission during the first draft EA comment period, a second 30-day comment period was offered.

Table 2. Summary of Comments Received Relative to Soils, Climate, Carbon, and Old Growth

These subjects were combined as they are interrelated, and multiple comments were related to more than one of the topics.

Summary of Comments	Consideration of Comments
Commentors requesting soils report.	The project soils report can be found on the project website under Draft Environmental Analysis in the Supporting Documents folder, it was originally published on July 27, 2023, along with the Draft EA.
Project activities will cause soil erosion. An analysis of the risk of soil erosion is needed. Erosion and runoff could impact soils, trails, waterways, wetlands, and diminish water quality.	Soil erosion is addressed in the Project Soils Report on page 3, which is available on the project website. 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). However, by following BMPs and the design features related to this project, and based on monitoring of previous similar projects, no long-term detrimental effects are anticipated.
Need to stop logging to sequester and store carbon.	When considering carbon and climate change in the context of land management activities, it is necessary to consider the overall management objectives associated with a piece of land, the carbon stocks in different pools, and the flows of carbon between these pools. That is to say it is necessary to consider the forest sector carbon cycle in its entirety and not single out individual processes. The White Mountain National Forest is incorporating the concepts of resistance, resilience and transition in responding to the issue of climate change at the project level. The environmental impacts section of the EA evaluates how the project adapts the forest to climate change. 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, as addressed in the Forest Carbon White Paper for the White Mountain National Forest. Furthermore, the proposed project would transfer stored carbon in the harvested wood to the product sector, where it may be stored for up to several decades and substitute for more emission intensive materials or fuels. This proposed action is consistent with internationally recognized climate change adaptation and mitigation practices. The Forest has incorporated management actions that help to sustain and conserve ecosystems over the long term and ultimately stabilize the capacity of the forest to retain long-term carbon stocks. The conclusion that the project would increase resilience to climate change by increasing diversity of age class, forest type and within-stand diversity is paired with the assumption that the project is designed to promote the Forest as a continuing carbon sink. This may indeed involve short term reductions in carbon due to disturbance facilitated by the project (see Forest Carbon White Paper, section 5.0) but such reductions due to disturbance have to be considered alongside the long-term management of the forest as a continuing carbon sink, with greater structural diversity, greater within-stand diversity of species, species composition that is better aligned with Forest Plan objectives, and continuing carbon uptake from young forests. The Forest Carbon White Paper speaks to mature and old growth forests in section 3.4 page. 25 and section 3.2 page. 20. Greenhouse gas emissions for a project the scope and scale of Sandwich is addressed in the project carbon assessment on page 2.

Summary of Comments	Consideration of Comments
Project activities will release carbon stored in the soil and lead to soil carbon loss.	Outside of a very few situations, forest management activities conducted properly (i.e. no major soil disturbance) have not been shown to result in significant loss of carbon from the soil. A portion of carbon from harvested stems remains stored in wood products, and slash decomposes slowly. As long as land use remains forest, those losses are offset. These comments do not reflect the relevant time scale or the current state of knowledge; Effects on soil carbon are generally small and transient. In the southern U.S. where there is blading, ripping, and subsoiling, you can see losses. Detectable effects are rarely found outside of that; 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.
The Forest Service is relying on a Forest Plan that does address "carbon" or "climate change". Climate change is an ever-growing threat and must be considered in forest management.	To evaluate the current carbon situation on the WMNF, ensure compliance with current agency guidance, and to respond to comments, the Forest Carbon White Paper was updated, the project carbon assessment was then updated as well. These two documents can be found on the project website under Final Environmental Assessment, Supporting Documents. The proposed action is consistent with recognized climate change adaptation and mitigation practices and the specific actions proposed enhance compositional and structural diversity within the project area. See response in the Land Management Section regarding the Forest Plan.
The proposed clear-cutting and prescribed burning do not seem to take what we now know about climate change and carbon storage into account. The burn will release huge, unnecessary carbon into the atmosphere from both slash and soil. Carbon Sequestration from not disturbing the larger trees and more mature forests will have a bigger impact than reforestation and replanting. The project will worsen the climate crisis.	The goal of carbon stewardship is to optimize carbon within the context of ecosystem integrity and climate adaptation. The Forest Service has a multi-use mission to steward the national forest for the benefit of current and future generations. To that end we have incorporated carbon stewardship into our holistic approach to land management. This proposed action is consistent with recognized climate adaptation and mitigation practices and specific actions proposed are intended to enhance composition and structural diversity within the project area. Silvicultural prescriptions considered forest health and habitat objectives. Additionally, prescribed burns conducted under expert guidance are an effective tool for achieving ecosystem benefits while mitigating soil carbon losses that would otherwise occur in a wildfire. This focus on long-term ecosystem integrity is in alignment with carbon stewardship. Additional information can be found in section 3 of the Forest Carbon White Paper and Project Carbon Assessment, both of which are available on the project website.
Executive Order 14072 not adequately addressed.	The WMNF Forest Plan prohibits timber harvest in old growth and forests with old growth characteristics (FP page 2-13, S-3). During our surveys of the project units, we identified, removed, and protected fifty acres of habitat meeting those descriptions. In addition, we identified, inventoried and mapped a stand in the project area outside the proposed units for future protection. To meet the requirements of the Executive order 14072, the Forest Service recently announced that all Forest Plans nationally will be amended to prohibit management in old growth forests. That amendment will apply to the WMNF Forest Plan however our plan is already very restrictive concerning the protection of old growth. Mature and Old Growth Forests are also addressed in the Forest Carbon White Paper.
Project activities will negatively affect mycorrhizal fungi and the arboreal ecosystem.	Since this project has no intention to convert forested land to a different land use, the specific actions proposed are intended to enhance compositional and structural diversity within the project area, this approach should insure a diversity of plant species, which will maintain a diverse soil microbiome. When a tree is harvested it is possible the ectomycorrhizal fungi associated with that tree might die, this along with the root system of the tree will continue to decompose within the soil profile and provide a source of organic matter and humic material that enhances aggregate stability in the profile. It should be noted that ectomycorrhizal fungi can extend far into the soil and infect multiple host plants at once, an evolutionary mechanism that helps these species persist despite disturbance. The Forest Carbon White paper discusses effects on soil carbon in section 3.1

Summary of Comments	Consideration of Comments
The Forest Service says 76% of the land under consideration is “mature forest”.	This comment is referring to the Habitat Management Unit that the project is located within, not the project area itself. This comment refers to the Desired Conditions description in the HMU rationale that describes this in further detail on pages 4 and 5. In summary, the HMU is approximately 25,000 acres, 76 percent of that is considered mature and is unsuitable for timber harvest. The remaining 24 percent of the HMU that is considered suitable for timber harvest is the area the Sandwich Project is located in. Additionally, as stated in the old growth section of this document, the WMNF Forest Plan prohibits management in old growth and forests with old growth characteristics. During our surveys of the project units, we identified, removed, and protected fifty acres of habitat meeting those descriptions. In addition, we identified, inventoried and mapped a stand in the project area outside the proposed units for future protection.
Will your team consider using any silvicultural prescriptions for increasing old-growth structural attributes?	The primary goal of the vegetation management proposal is to increase wildlife habitat diversity and improve forest health, vitality, and resiliency. Old-growth is defined in the Forest Plan. Part of this definition includes having an uneven-aged forest, an abundance of trees at least 200 years old, large diameter snags and down logs, a forest floor exhibiting pit-and-mound topography, and little or no evidence of past timber harvest or agriculture. Prescriptions are proposed on MA 2.1 lands where timber is managed to provide a sustainable yield of high-quality forest products, with an emphasis on sawtimber and veneer. Increasing old-growth structural attributes are not the primary goal of prescriptions. Certain prescriptions may provide some uneven-aged structural attributes but will lack other measures to be defined as old-growth.

Table 3. Summary of Comments Received Relative to Water Resources.

Summary of Comments	Consideration of Comments
Road construction will cause runoff.	No new road construction is included in the Sandwich project. To facilitate vegetation management and access, we will reconstruct approximately 4 miles of existing system maintenance level 1 and 2 roads and 0.5 mile of existing road on lands of other ownership. We will also decommission approximately 0.5 mile of existing system roads. Also included in the proposed action, of the approximately 16 miles of existing unauthorized roads in the project area, 12 miles will be converted to maintenance level 1 system roads, and 4 miles will be decommissioned (plans for roads are included in appendix C of the EA). The planned transportation actions will help stabilize the road system and will include stream crossing infrastructure, such as culverts or bridges where needed which will reduce the current runoff issues that can be found within the project area. Reconstructed features intended to capture runoff water are designed to drain into areas suitable for trapping sediment and do not drain directly into streams, wetlands, or vernal pools.
The forest should use national BMPs to protect perennial and intermittent streams.	Forest Plan Standards and Guidelines will be followed, and applicable State and National Core BMPs will be implemented to minimize erosion and sedimentation. Therefore, no measurable changes to water quality or quantity are expected (EA, pages 21, and 25-26).

Summary of Comments	Consideration of Comments
The project will cause higher levels of water quantity during rainstorms.	Research in the White Mountain National Forest has shown that water quality changes are not measurable at harvest levels below approximately 20% basal area removal in a watershed, and water quantity changes are not measurable at harvest levels below approximately 25% basal area removal in a watershed. Within the Sandwich Project, percent basal area removed exceeds 20 percent in one watershed, which is the watershed of an unnamed perennial stream in the vicinity of Unit 23 that flows into Cold River. This watershed is 78.9 acres in size, and the planned basal area reduction is 35.8 percent. The potential changes in water quality resulting from the implementation of the proposed action that may be of concern to aquatic ecosystems are a decrease in pH making the water more acidic, or an increase in aluminum. There are several characteristics of this watershed that reduce the water quality and quantity concerns resulting from harvesting 35.8 percent of the basal area. First, the perennial stream in this watershed is not a fish-bearing stream as the channel is quite small. Second, the slope of the watershed is lower than most, which leads to increased infiltration and slower water movement through the watershed. This allows more time for water to pick up ions along its path to the stream, making the stream better buffered against acidification and aluminum toxicity risks. Third, beaver activity in this watershed further slows down water and stores water, further reducing acidification and aluminum toxicity risks. All other watersheds within the project area will experience basal reductions of 20% or less.

Table 4. Summary of Comments Received Relative to Scenery.

Summary of Comments	Consideration of Comments
Project activities will have negative effects on scenery from several viewpoints, some that were not analyzed – the Sandwich Dome, Noon Peak, Mt. Israel, the Tripyramids, and nearby valleys.	The viewpoints chosen for analysis were determined based on the methodology described in the of the Project Scenery Resources Effects Analysis on page 4. The suggested viewpoints were determined to have minimal view of the treatment units and those that had a greater area of view were selected to ensure the area of visibility did not exceed FP standards. Additionally, views from the valleys will be less impacted than from the analyzed viewpoint due to screening from topography and vegetation.
Project will mar the landscape and make it unattractive to tourists, dissuade people from returning and negatively affect local economy.	Based on the visual analysis conducted by the Forest Service the visual character of the project area is not expected to change much and will likely not be noticeable to most people. From some viewpoints observers may notice slight changes to color, texture and shadows, and possibly a small amount of ground visibility for a short time. Based on this, the recreation experience is not expected to be significantly affected for seasonal users of the area.
Scenery analysis does not include an adequate number of viewpoints.	All viewpoints selected for analysis are included in the project record. Viewpoints are chosen by the highest potential opportunity and volume of public access as well as having the best proximity and quality of viewshed of the project area. Viewpoints on private land are not considered high potential opportunity for public access therefore they are not eligible as viewpoints to be selected for analysis. Some viewpoints are chosen for alternative views (alternate angles) to expose as much of the project area as possible for analysis (again meeting previously mention criteria). The analysis included computer modeling depicting and highlighting any potential impacts and GIS analysis derived data, all of which are described in detail in the project Scenery Resources Effects Analysis.

Table 5. Summary of Comments Received Relative to Socioeconomics.

Summary of Comments	Consideration of Comments
Claim that the Forest Service is putting short term financial gain of timber harvest above protection of the forest.	An economic analysis was conducted at the Forest Plan level, and an updated assessment was completed in 2013 (Lee et al., 2013). The proposed project is consistent with the Forest Plan goal of providing sustainable yield of high-quality forest products, with special emphasis on sawtimber and veneer. The Proposed Action would help move the forest toward desired conditions by maintaining and improving landscape resiliency, promoting forest health and resistance of Forest lands to disturbances and other stressors, and diversifying wildlife habitat. These benefits are not monetary and cannot be captured in an economic efficiency analysis.
Timber management is not a great help to the economy and does little to create jobs.	Timber management is a component of the greater economy. Timber management will provide to the local town 10% of the stumpage through the New Hampshire Yield Tax. Twenty-five percent of all White Mountain National Forest revenue is shared with local communities that have national forest land through the Secure Rural Schools Program. Timber sales provide direct employment to loggers and truckers, raw materials to local sawmills, firewood for local home heating. Supporting businesses benefit from fuel sales, mechanical services, and other types of services and sales.
The project will negatively impact area tourism.	The entire Sandwich Range region is a popular destination for recreation, the majority of the mileage falling within Congressionally designated wilderness which is not managed for timber. In the lower elevations, outside of wilderness, the land is managed for multiple uses, recreation, timber, and wildlife. This management does not exclude recreation, in fact it continues to provide access and allows the public to witness active management of a working forest. The periodic disruptions of full access will be temporary and therefore it is not expected to interfere with the local tourism economy. Furthermore, economics was not an issue identified for detailed analysis as it was not brought up during scoping. Additionally, it is not a required element to be analyzed.

Table 6. Summary of Comments Received Relative to Planning and Land Management.

Summary of Comments	Consideration of Comments
Land should be managed to benefit the ecosystem to the best extent possible.	The primary goal of the vegetation management proposal is to increase wildlife habitat diversity and improve forest health, vitality, and resiliency, which have similar outcomes to what the commenter wishes to see come from ecosystem management. Effects from the proposed action on vegetation, climate change, water quality, and wildlife can be found in the "Environmental Effects" section of the EA.
The Sandwich project prevents the land from naturally evolving.	The Sandwich Project is needed to achieve the goals and objectives discussed in chapter 1 of the Forest Plan. Vegetation management is suitable on approximately 40% of the WMNF land base, meaning that 60% of the land base is being managed to transition naturally through succession. The Sandwich Project is located in the Sandwich HMU where 24 percent of the HMU is considered suitable for vegetation management activities. The activities planned will benefit the project area and surrounding area in the long term.

Summary of Comments	Consideration of Comments
The Sandwich, Wonalancet, and Tamworth areas should not be affected by the project.	The Forest Service has a multi-use mission to steward the National Forest for the benefit of current and future generations. Impacts to neighboring communities are taken into consideration when planning activities on the National Forest. All of the planned activities associated with the Sandwich Project are planned on the National Forest and not on private lands. While the neighboring communities may see an increase in log truck traffic, and may experience short durations of smoke, impacts will be intermittent and short term. Short term impacts for long term benefits to the wildlife habitats will benefit the neighboring communities in the long term. Balancing the needs of present and future generations is one of the greatest challenges the Forest Service faces as a multiple use agency.
The WMNF Land and Resource Management Plan is out of date and should be revised before any timber projects are planned or implemented.	The current analysis is consistent with Forest Plan direction. Forest plan revision is out of scope for the current proposal and are planned at the agency level. A Forest Plan revision is a very timely and very expensive process; it is up to Congress to provide funding for a forest to revise its land management plan. Every year Congress includes wording in the appropriations bill that allows Forests to have plans that are more than 15 years old as long as the agency is conducting revisions across the country consistent with the funding Congress has provided. It does allow for a court to direct completion of a specific Plan, which would prompt shifts in agency funding plans. Currently there are National Forests and Grasslands whose Land and Resource Management Plans are substantially older than the WMNF. Some were signed in the 1990s and many in the early 2000's. The WMNF Forest Plan is still valid and if something needs adjusting, an amendment is proposed. The Forest landscape has not changed significantly in the last 18 years, meaning there has been no landscape scale fire, insect outbreak, or wind event that made it impossible to implement Forest Plan goals and objectives. Other units have not been so fortunate so revisions there have been prioritized. Big topics that were not covered in the Forest Plan, such as climate change, can and are addressed in WMNF land management because the Plan provides flexibility to do so. “Public Law 116 - 6 - Consolidated Appropriations Act, 2019: Sec. 407. The <<NOTE: 16 USC 1604 note.>> Secretary of Agriculture shall not be considered to be in violation of subparagraph 6(f)(5)(A) of the Forest and Rangeland Renewable Resources Planning Act of 1974 (16 U.S.C. 1604(f)(5)(A)) solely because more than 15 years have passed without revision of the plan for a unit of the National Forest System. Nothing in this section exempts the Secretary from any other requirement of the Forest and Rangeland Renewable Resources Planning Act (16 U.S.C.1600 et seq.) or any other law: Provided, That if the Secretary is not acting expeditiously and in good faith, within the funding available, to revise a plan for a unit of the National Forest System, this section shall be void with respect to such plan and a court of proper jurisdiction may order completion of the plan on an accelerated basis.” The language quoted above is used in every annual appropriations bill passed by Congress.

Table 7. Summary of Comments Relative to Implementation.

Summary of Comments	Consideration of Comments
Requests that Forest Service award contract to local companies that have history of abiding by state law and best management practices.	Timber sale contracts on the White Mountain NF have historically been awarded to local small business and we would expect that trend to continue. All purchasers are required to follow the terms of the contract and follow best management practices.

Summary of Comments	Consideration of Comments
Suggestions for the forest to use interpretive signage for educational and informative purposes where recreation and forestry activities intersect.	The Forest Service appreciates the suggestion and has already discussed installing interpretive and education signage along some of the trails in the project, with one of the local trail groups.
The prescribed burning, how often will this process be implemented and how far into the future will it continue?	The prescribed burning will occur 3 years after completion of harvest. The two units where prescribed fire will be applied to promote red oak generation and establishment may see recurrent burns on a 5- to 7-year basis until the desired red oak stems are established and competitive in the stand. Once the oaks are established, the stand will be left to grow. The wildlife opening will be prescribed burned on a 3- to 5-year rotation to maintain the early successional habitat desired by range of wildlife species.
Concerns regarding the impacts of log trucks on the roads, also concerned about the safety of local residents driving among log truck traffic	Public and Forest Service roads are built to handle truck traffic of all types, including log trucks, and conditions will be monitored during operations to ensure effects to resources is limited. The additional traffic from log trucks will be a small increase over the current traffic and will be intermittent, and temporary. Traffic amounts will be similar to current levels as logging occurs on private lands as well. Signage will be utilized during timber harvesting operations to notify road users of the log truck traffic and on Forest Service roads staff will monitor traffic for safety concerns. Traffic control on non-Forest Service roads is the responsibility of local and county law enforcement.

Table 8. Summary of Comments Relative to Quality of Life (Noise, Safety, and Smoke).

Summary of Comments	Consideration of Comments
Project activities will create noise pollution that will affect local community and recreators.	Vegetation management activities will occur during all times of the year, except spring. Noise will be a short-term impact during operations and will be sporadic and not constant. Noise impacts will occur during weekdays and will affect a limited number of non- motorized recreationists. Noise will be a short-term impact during operations and will be sporadic, not constant. Noise impacts to recreational visitors will also be dampened where buffers are applied. Work would be conducted using standard equipment and techniques, similar to previous projects on the National Forest. Recreational users in some places at sometimes seeking naturally silent activities may experience some disturbance during periods of activity.
Residents express concerns regarding smoke and air quality associated with the planned burning.	The prescribed burn plan contains a smoke management section that identifies favorable conditions to minimize smoke impacts to communities and roads. Ignition of the burn units will be completed in one day. The prescribed burn will occur when atmospheric conditions allow for rapid lift and dispersion of smoke.
The project will cause safety issues and interruptions of use for recreationists.	There is no plan to close the Ferncroft Trailhead or any other trailheads. When timber operations are active, parking sites will be reduced to allow safe passage and where needed for safety, trails also may be temporarily relocated. Both Liberty and Ferncroft Trailheads will have temporary interruptions through the seasons by way of limited size of the parking lots to allow trucks to safely come through and temporary trail relocations to allow trails to continue being used safely by the public. While there will be periodic reductions of parking in the parking lots, the trails will not be closed. During the times of hauling, up to 15 vehicles will not have access to the parking lot at Ferncroft. Hauling will be along the existing road prism which runs along the south side of the Ferncroft parking lot. During timber operations, parking will not be allowed on the south side of lot. One side of the parking lot will still be open for parking. Hauling will be limited to Monday-Friday except holidays. There will be an effort to communicate partial closures in advance. There will also be a safety plan included in the timber sale contract and oversight by Forest Service personnel in the areas of the parking lots and roads.

Summary of Comments	Consideration of Comments
What additional traffic safety measures will be implemented in order to insure that current laws are obeyed? Speeding on local roads has been an ongoing and largely unchecked problem for residents.	Traffic control on non-forest service roads is the responsibility of local police departments and county law enforcement. On Forest Service roads used for the timber sale, forest staff will monitor traffic for safety concerns. Timber sale contracts also include provisions that address road safety and when signage is required.
Will buffers be applied to private property and parking lots?	The Forest Plan does not require buffers along property boundaries or parking lots and are therefore not included in the project. Additionally, clearcuts are not planned adjacent to either of these features.

Table 9. Summary of Comments Relative to Cultural Resources.

Summary of Comments	Consideration of Comments
Forest Service did not coordinate with tribes.	The list of Federally recognized tribes contacted during scoping is included in the National Historic Preservation Act section of the final EA.
Request for the Guinea Hill Settlement area to be protected.	Guinea Hill settlement is not in a treatment unit. Measures to protect archaeological sites and historic landscape features, such as stone walls, and provisions for the inadvertent discovery of previously unknown archaeological sites are described in the Project Design Criteria located in appendix A of the final EA. The New Hampshire State Historic Preservation Office (New Hampshire Division of Historic Resources) was consulted and concurred with the finding of No Historic Properties Affected under Section 106 of the National Historic Preservation Act, subject to the described protection measures.
Why are the local hiking trails not considered Traditional Cultural Properties?	Traditional Cultural Properties are identified by federally recognized tribes as described in Section 101 of the National Historic Preservation Act.

Table 10. Summary of Comments Relative to Recreation.

Summary of Comments	Comment Consideration
Project activities will negatively affect hiking in the area.	The White Mountain National Forest manages and formally recognizes 1200 miles of trail. In addition to these miles, there are numerous additional miles including historic non-maintained and unauthorized trails on the National Forest. The Forest Plan does not recognize trails that are not formally included in the WMNF trails system. Project design is in compliance with Forest Plan direction in regard to vegetation management along the recognized trails within the project area. On the Brook Trail (Liberty trailhead) we reduced the size of one of the units to move it up the slope and away from the trail. The other units on the Brook trail are buffered over 150 feet or are up on the ridge and cannot be seen. The Liberty trail does not have any regeneration harvests adjacent to the trail. The Cabin and Big Rock Cave Trail will be buffered by a minimum of 66 feet from group selections. As a multiple use agency, the Forest Service strives to balance competing uses for the needs of present and future generations.
Project activities will have a negative effect on winter recreation use in the area.	Although the USFS does not manage developed recreational opportunities in this area, it is recognized that opportunities for primitive undeveloped recreation do exist in the project area. Winter users of the area trails should be minimally affected by the project but may experience reduced parking availability, intermittent noise, and temporary trail relocations. Winter recreationalists seeking naturally silent activities may experience some disturbance during periods of activity in some places at sometimes.

Summary of Comments	Comment Consideration
Trails will be damaged by the project.	Skid trails are laid out by the Forest Service in conjunction with the purchaser. The Forest Service must approve all skid trails before they are cut out and used. The Forest Service follows all Best Management Practices during skid trail layout and use. When trails are used, the Forest Service works with the purchaser to make sure there is no unacceptable resource damage. When skid trail use is complete the Forest Service works with the purchaser to restore skid trails where needed including waterbars and seeding. The logging operation will not be skidding on existing roads and trails. At most a crossing is made and then rehabilitated after the logging is completed. This project follows Forest Plan direction, and the timber sale contract requires the rehabilitation. Recreation project design criteria RE-3 specifically addresses this concern.
Parking availability will be impacted by the project.	There is no plan to close the Ferncroft Trailhead or any other trailheads. When timber operations are active, parking sites will be reduced to allow safe passage and where needed for safety, trails may be temporarily relocated. Both Liberty and Ferncroft Trailheads will have temporary interruptions through the seasons by way of limited size of the parking lots to allow trucks to safely come through and temporary trail relocations to allow trails to continue being used safely by the public. While there will be periodic reductions of parking in the parking lots, the trails will not be closed. During the times of hauling, up to 15 vehicles will not have access to the parking lot at Ferncroft. Hauling will be along the existing road prism which runs along the south side of the Ferncroft parking lot. During timber operations parking will not be allowed on the south side of lot. One side of the parking lot will still be open for parking. Hauling will be limited to Monday-Friday except holidays. There will be an effort to communicate partial closures in advance. There will also be a safety plan included in the timber sale contract and oversight by Forest Service personnel in the areas of the parking lots and roads.

Table 11. Summary of Comments Received Relative to Wildlife Resources.

Summary of Comments	Consideration of Comments
Need for permanent wildlife opening management.	The Forest Service Final EIS (2005) summarizes the role that natural disturbances play in creating open areas and young forest habitat on the WMNF. As stated in the FEIS (page. #3-79), an estimated one to three percent of hardwood forests and three to six percent of softwood forests would be in a seedling-sapling stage at any given time under natural conditions. Unlike the permanent wildlife openings managed by the Forest Service, these areas would eventually succeed into mature forests, barring additional natural disturbances. The Forest Plan includes desired future conditions for wildlife openings on page 1-21, and the HMU rationale for the Sandwich Project includes an analysis of the difference between the existing and desired future conditions. In addition, the terrestrial habitat management documented cited on page 5 of the EA and pages 5-8 of the HMU rationale provides further background on the need for the creation and maintenance of wildlife habitat, including permanent wildlife openings. These documents inform the need for wildlife habitat management. In addition, on page 5 of the HMU rationale describes the need for management of the relatively large wildlife opening to address recommended opening sizes of 30 acres or less. The commenters reference wildlife habitat off-Forest. However, the scope of this proposal concerns wildlife habitat management consistent with the Forest Plan and within the Sandwich HMU objectives. Further, open areas located on private lands are not necessarily managed as wildlife habitat and are not subject to Forest Service control. The Forest Service manages wildlife openings for the sole purpose of providing this habitat to the species that utilize it. Great care is taken to minimize negative impacts to wildlife in the maintenance of these areas. The Forest Service has not claimed that a lack of open habitats on the WMNF is a limiting factor for any species, rather that a suite of species benefit from maintenance of open habitats. The rationale for maintaining areas in an open state is detailed in the Forest Plan and its supporting documents.

Summary of Comments	Consideration of Comments
The EA does not acknowledge the value of beech as a source of mast.	Unit prescriptions include the retention of large healthy disease free/resistant beech in non clearcut/patch cut units for seed source/mast for wildlife. Additionally, within the Sandwich HMU there will be about 675 acres that will not have planned treatments assigned to them where beech will be left unmanaged.
Project will in general have negative impacts on wildlife.	The Forest Service acknowledges the proposed timber harvests would have negative impacts on some species while benefitting others. Specifically, timber harvests would decrease the available habitat for species that depend on mature, interior forests for all or some of their life cycles. For example, there is likely to be less nesting habitat for ovenbirds after project implementation. On the other hand, species that require or prefer early successional forests, such as the chestnut-sided warbler, would benefit from the proposed harvests. There is no doubt the proposed action would change the wildlife species composition of the project area. There are a number of Standards and Guidelines in the Forest Plan that would minimize effects to wildlife (2-33 to 2-36), including rare and unique habitats and wildlife species (2-13 to 2-16). The silvicultural treatments were carefully planned to ensure that all existing habitats would not be minimized to the point that any wildlife species would be lost. This includes common species as well those designated as threatened, endangered, or sensitive. The degree of forest management proposed would not disrupt migratory pathways. The commenters expressed concern over a number of individual species. All of these would continue to persist within the project area. Many, including the chestnut-sided warbler, Canada warbler, moose, deer, and bear, either depend on early-successional forests or are known to regularly use such habitats, including those created through timber harvests. The WMNF acknowledges that project activities will attract game species such as deer, moose, grouse, bear, and turkey. However, the main goal of vegetation management on the White Mountain National Forest is to "manage vegetation using an ecological approach to provide both healthy ecosystems and a sustainable yield of high-quality forest products, with special emphasis on sawtimber and veneer." FP, page. 1-17. The project helps the forest move towards this goal.
Project will affect vernal pools and wetlands.	The Forest Service will follow the Guidelines set forth in the Forest Plan (pages 2- 24 to 2-26 and pages 2-30 to 2-32) regarding the buffering of vernal pools and wetland. Specifically, no tree cutting, or other timber harvest would occur within 25 feet of a vernal pool. From 25 to 75 feet from a vernal pool, tree cutting would be permitted, but would be designed to maintain a relatively continuous forest canopy. The Forest Service acknowledges there may be effects to wetland-dependent wildlife species, primarily in the form of changes to their habitats. However, following the Standards and Guidelines previously mentioned, effects to wetlands and wetland dependent wildlife species would minimize these effects. The silvicultural treatments were carefully planned to ensure that impacts to existing sensitive areas and habitats, including vernal pools and wetlands, would be minimized. As documented in the EA and BE, the proposed action would not result in a trend toward federal listing or loss of viability of any RFSS. No wildlife habitat would be impacted to a degree that would threaten any federally listed, sensitive or, by extension, common wildlife species in the affected area.
Support of treatments to increase the early successional habitat, which is needed by many species including many non-game species such as songbirds and pollinators, as well as many game species including American woodcock, roughed grouse, and cotton tail rabbit.	Most disturbance-dependent species, especially birds, are declining throughout the region whereas species affiliated with mature forests are generally increasing or maintaining populations. Disturbance must be simulated for conservation of early-successional species, many of which are habitat specialists compared to those associated with mature forests. (DeGraaf and Yamasaki 2006). The Sandwich VMP uses guidance from this paper which suggests using habitat composition goals to maintain a balanced and integrated set of forest conditions that includes early-successional habitats and young as well as mature and old forest for a broad diversity of species over time, also summarized in DeGraaf et al. 1992.

Summary of Comments	Consideration of Comments
What is the cost of maintaining permanent wildlife openings and how often will this occur?	Without frequent maintenance (every 1-5 years depending on the site), the vegetation will return to a forested condition. Less than one percent (~0.1%) of the land on the WMNF is considered part of a permanent wildlife opening. This is below the objective (1%) outlined in the WMNF Forest Plan (USDA-Forest Service, 2005a, page 1-21). This project will create a new opening which will create and retain a critical habitat and prevent the Forest from growing farther from its habitat goal. While there is a cost associated with maintaining these areas, the habitat benefits gained from this project can't be represented monetarily.

Table 12. Summary of Comments Received Relative to Invasive Species.

Summary of Comments	Consideration of Comments
Project activities will introduce and spread invasive species.	The Sandwich Project Non-Native Invasive Species (NNIS) Risk Assessment describes, and maps known invasive species locations; discloses and analyzes anticipated effects of the project on NNIS; assigns an overall risk level for the potential spread and establishment of NNIS; and identifies applicable Forest Plan Standards and Guidelines, Standard Operating Procedures, and project specific Design Features to control and limit the spread of NNIS in the project area. The level of infestation within the project area is very low, consisting of two known locations: one occurs at an old log landing and the other near a road culvert. Any invasive treatments within the Sandwich project area would be carried out as part of the WMNF Forest-wide Invasive Plant Control Project, which identifies infestations requiring control work prior to implementation of projects across the Forest based on priority and need (i.e., threat level and risk of spread). This annual prioritization of control work under the Forest-wide Control Project will include a plan for addressing control needs in the Sandwich project area before or during implementation. Planned control work is just one aspect of preventing the spread of invasives within the project area; Standards, Guidelines, Standard Operating procedures, and design features include numerous strategies designed to prevent the introduction or spread of invasives, such as equipment cleaning, gravel pit inspections, and use of native plants in revegetation efforts. The WMNF Control Plan EA discusses how the Forest follows an Integrated Pest Management (IPM) based approach to controlling invasive species, which is fundamentally about using multiple complimentary strategies. The Control Plan identifies specific non-native invasive species targets on the Forest, and applicable preventative measures, and control strategies and techniques. Manual control techniques and application of herbicides are both important strategies for effective control of NNIS. The Control Plan evaluated risks and effects of specific herbicides to humans, soils, aquatic systems, invertebrates, and other wildlife, and authorizes the use of three herbicides on the Forest. When herbicide applications are warranted, the WMNF almost exclusively uses spot foliar application methods or cut-stump applications according to the required herbicide label directions. The applications are very targeted to individuals of the invasive species and involve very limited amounts of herbicides (since the infestation sizes of invasive species on the WMNF are relatively small). We follow all applicable federal and state laws and regulations regarding application of herbicides, including obtaining an annual Special Permit from the NH Division of Pesticide Control and required setbacks from public water supplies and surface waters. Herbicides used in the vicinity of water or wetlands are formulated for use near aquatic systems (that is, they are relatively immobile, will not readily leach offsite and into aquatic systems, and quickly biodegrades naturally on-site). The Forest Wide Control Plan EA concluded that by following an IPM approach, and all applicable federal and state laws and regulations, that risks to humans, water quality, wildlife and other environmental risks from use of the three authorized herbicides are very small or negligible.

Table 13. Summary of Submitted References and Links.

Summary of Comments	Consideration of Comments
Multiple pictures and images were submitted.	The IDT reviewed submitted photos, screenshots, and attachments as a group during and IDT meeting. They were asked to consider the submitted materials as the considered the associated written responses.
Attachment consisted of an excel spreadsheet with 69 commenters in opposition to the Sandwich Vegetation project	Comments included in the letter are addressed in the subject specific sections of this document.
Attachment to a comment letter that included 50 signatories to the letter	Comments included in the letter are addressed in the subject specific sections of this document.
https://nypost.com/2017/09/15/theres-a-1-in-20-chance-humans-will-be-wiped-out-this-century/	This is not science and was not considered.
https://sites.google.com/view/protectsandwichrange/	Comments weren't included in this submission but were submitted separately. Website includes opinions and claims, but no requests for information. Comments that were submitted separately are addressed in the subject specific sections of this document.
https://www.bcg.com/publications/2020/the-staggering-value-of-forests-and-how-to-save-them	This article discusses the value of forests in terms of their ability to regulate the climate. This project is in line with this article. The analysis found that land use changes and rising global temperatures, major drivers of deforestation, will actually be the main causes of forest value losses. And the number one suggested action “to protect forests and limit deforestation—and therefore preserve forest value: restore and plant forests for the purpose of protection as well as wood production, sustainably manage these and more of the existing forests, and increase their productivity” which this project aims to do.
https://www.washingtonpost.com/archive/politics/1997/11/21/us-lost-15-million-selling-public-timber/85e9e176-a900-44b4-940c-da66c34f2c40/	While the reference provides information regarding carbon, the FS doesn't sell carbon credits and the project isn't economically driven, rather ecologically driven.
https://www.chocorualake.org/news/forest-carbon-replay-resources	Information included in the provided link is already being implemented in references used by the Forest.
https://www.governor.nh.gov/news-and-media/new-hampshire-tourism-reports-record-breaking-fall-season	Article discusses New Hampshire tourism experiencing a record-breaking fall. This article is not project specific. Additionally, the White Mountain National Forest as a whole is a tourist destination, bringing in and visitors which stimulates the local economies, this project does not convert land to other uses and will be available for use during and after implementation.
https://extension.unh.edu/goodforestry/	Document includes suggested forest management practices, comment referred to the last bullet on page 63, which reads, “Maintain an uncut or partially cut buffer of 150 feet along recreation trails.” The primary concern heard during meetings with local residents and clubs was regarding trails that pass-through regeneration harvests where all trees are removed. On the Brook Trail (Liberty trailhead) we reduced the size of one of the units to move it up the slope and away from the trail. The other units are over 150 feet from the trail or are up on the ridge and cannot be seen. The Liberty trail does not have any regeneration harvests adjacent to the trail. The Cabin and Big Rock Cave Trail will be buffered a minimum of 66 feet from group selections.

Summary of Comments	Consideration of Comments
https://onlinelibrary.wiley.com/doi/pdf/10.1111/gcb.14656	Document refers to old forests (at least 170 years old) being the best among forest types in strengthening ecosystem services and biodiversity. Article is general in nature and not site specific. MA 2.1 lands, the MA which the timber management actions are proposed in, are managed for increased wildlife habitat diversity and to provide high-quality timber products, per the WMNF Forest Plan. Accessible MA 2.1 land (outside of RACR which are roadless areas designated under the Roadless Areas Conservation Rule) represents about 40% of the White Mountain National Forest, therefore the other 60% are not managed for forestry and are left mostly as they are, with minor exceptions for recreation and public safety needs.
https://iopscience.iop.org/article/10.1088/1748-9326/ac5c10	Document refers to southern Australian forests and their flammability during different successional stages. Document is general in nature and not site specific. Study is not relevant to the forest types of the Northeastern United States.
https://onlinelibrary.wiley.com/doi/abs/10.1111/geb.12747	Document refers to the contribution of large-diameter trees to biomass, stand structure, and species richness across forest biomes. Article is general in nature and not site specific. Management Area 2.1 lands, the Management Area which the project is proposed in, are managed for increased wildlife habitat diversity and to provide high-quality timber projects, per the WMNF Forest Plan. Accessible MA 2.1 land (outside of RACR) represents about 40% of the White Mountain National Forest, therefore the other 60% are not managed for forestry and are left mostly as they are, with minor exceptions for recreation and public safety needs. The WMNF Forest Plan prohibits management in old growth and forests with old growth characteristics. During our surveys of the project units, we identified, removed, and protected fifty acres of habitat meeting those descriptions. In addition, we identified, inventoried and mapped a stand in the project area outside the proposed units for future protection. While timber harvesting does lead to tree mortality, it also leads to opportunity for new trees to take root and grow where they otherwise would not have the opportunity. Climate change is analyzed for effects under NEPA, no significant effects to climate change were found by the interdisciplinary team or the responsible official.
https://cbmjournal.biomedcentral.com/articles/10.1186/s13021-016-0066-5	This reference looks at carbon change by disturbance at a national scale across all ownerships based on FIA and disturbance maps from 2010. It is important to consider the scale of an assessment, the White Mountain NF have incorporated disturbance data in addition to updated 2020 FIA data in our forest carbon assessment. Harvest is the dominant disturbance type on the White Mountain NF but accounts for less than 0.2% of the total area of the White Mountain and the Forest is currently a carbon sink despite disturbance losses.

Table 14. Summary of Comments Received Relative to Vegetation Treatments, Prescribed Burning, and Roads.

Summary of Comments	Consideration of Comments
Old trees are essential for providing nutrients for younger trees in the forest and the forest did not consider this during proposal development.	As trees mature and fill out the canopy, they shade smaller (which can mean younger) trees which reduces growth rates and will sometimes kill shade intolerant tree species. Overstory removal as proposed in the Sandwich Project provides benefit to certain species of young trees as it will create growing space, provide additional sunlight, and nutrients for growth.
This area can be left alone, and other areas of the forest can be logged instead.	The Sandwich Habitat Management Unit (HMU) is one of many HMU's on the WMNF that is managed for the goals and objectives starting on page 1-20 of the Forest Plan. See bullets 12 and 16 for a summary of the process of how silvicultural treatments are determined. The goals and objectives of the Sandwich project align with those in the Forest Plan which move the WMNF toward the stated desired future condition.
What species will be cut?	All merchantable tree species will be cut, including beech.

Summary of Comments	Consideration of Comments
The Forest Service is misguided in their view of needing to create early successional habitat through forest management and natural processes provide the best benefit.	Most disturbance-dependent species, especially birds, are declining throughout the region whereas species affiliated with mature forests are generally increasing or maintaining populations. Disturbance must be simulated for conservation of early-successional species, many of which are habitat specialists compared to those associated with mature forests." (DeGraaf and Yamasaki 2006). The Sandwich VMP uses guidance from this paper which suggests using habitat composition goals to maintain a balanced and integrated set of forest conditions that includes early-successional habitats and young as well as mature and old forest for a broad diversity of species over time, also summarized in DeGraaf et al. 1992.
Why would you add unauthorized roads into your database? Are these illegal ATV, snowmobile or bike roads? They should all be decommissioned.	The roads being added from the TAP (Travel Analysis Process) have been reviewed and were determined to be beneficial to the management plan of the forest. The unauthorized roads are not illegal ATV, snowmobile, or bike roads. These roads most likely existed before the acquisition of the land, the addition of the roads to the database helps the maintenance and operation of forest road systems. Additionally, these roads can provide access to future use of the area for wildlife and timber programs. Maintenance Level 1 roads have been placed in storage between intermittent uses, storage must exceed one year. "Basic custodial maintenance is performed to prevent damage to adjacent resources and to perpetuate the road for future resource management needs." Maintenance Level 1 road entrances are blocked to motor vehicle use such as ATV, snowmobile, and bike traffic. Refer to FSH 7709.59, sec. 62.32 for further information on ML 1 roads.
Timber prescriptions should be altered to prevent effects to water and viewshed (less clearcutting, more single tree selection).	The draft EA includes a variety of silvicultural prescriptions, including single tree selection, for forest management (EA, pages 9-18). Proposed vegetation management activities are consistent with Forest Plan direction, including goals and objectives for wildlife habitat, scenery, and hydrology. Potential impacts to water quality and quantity and scenery are considered in the EA (pages 21, and 25-26). Additionally, of the 638 acres of planned treatments, 65 acres are clearcuts, with the remaining 90 percent of treatments being other prescriptions.
Logging large trees will cause an increase to the forest floor temperature.	This is an anticipated outcome of some of the silvicultural treatments on the Sandwich Project. Woody and herbaceous vegetation should germinate due to the abundance of light, corresponding warming of the forest floor, and increased nutrient cycling in the project area.
Doesn’t believe logging diseased Beech is necessary.	Addressing insect and disease issues, as well as allowing shade intolerant species to gain a competitive advantage is a main reason for cutting diseased beech while retaining healthy disease-free beech on the landscape. American beech exhibits characteristics of having slow early height growth compared to that of paper birch (fast), black cherry (fast), and aspen (very fast) (Leak et al. 2014). If appropriate light conditions are created through management, such as clearcuts, patch cuts, and group selection accompanied by mechanical site preparation to removed residual suppressed understory stems, the species listed above will outcompete beech regeneration within 5 years of harvest. There are stands included in this project proposal where the objective is to create canopy openings of varying sizes to recruit established softwood regeneration, which over time, will return to softwood dominated stands. To create a more resilient stand, harvesting diseased trees will create growing space for healthier more desirable trees within the stand.
Landing location should be disclosed.	The EA estimates the number or existing and new landings that may be used for analysis purposes. The actual location of landings used is determined by agreement between the FS and timber purchaser after sale award. All landings are located following Forest Plan direction.
The project is occurring in old growth stands that will take centuries to recover.	All treatment units in the project area were inventoried and do not meet the Old Growth Forest criteria listed on page 21 of the Abbreviations, Acronyms, and Glossary section of the White Mountain National Forest Land and Resources Management Plan. More information regarding the current age classes is included in the HMU rationale document.

Summary of Comments	Consideration of Comments
There is a lack of early successional habitat addressed in the project. This project will result in areas in the 0- to 5-year age class, but there is a complete lack of 5- to 20-year-old early successional habitat in the Sandwich Range and surrounding area.	As described on page 5 of the EA, approximately 24 percent of the Sandwich habitat management unit comprises a young age class, 76 percent is mature forest, and regeneration-age stands are limited or absent. Although some stands are too young to harvest, or natural processes are resulting in desired conditions without management, many opportunities still exist in this area to manage vegetation to advance Forest Plan goals and objectives described on pages 1-20 and 1-21 of the Forest Plan. The young age class of 5-20-year-old can't be achieved without first having the regeneration-age class of 0-5 years old. The prescriptions for this project were developed to target specific objectives which is why there are numerous silvicultural prescriptions, these treatments will move areas within the project area towards the desired condition by providing a mixture of age classes. Additionally, the purpose would be to harvest again to promote new regeneration-age stands as the regeneration-age stands will age into the young-age class. It is important to note that the wildlife goals and objectives cannot be attained in a single entry. As regeneration-aged forests mature into young-aged forests, more regeneration-aged forests will be needed to maintain age class objectives. It takes up to 70 years or more for a mature forest to develop from regeneration and thus a long-term objective for some habitats. Promoting lower stocking levels, or reducing density/competition, promotes growth as individual trees are retained and have increased access to resources such as water, nutrients, and growing space while other trees are removed that exhibit defects, disease, etc. that negatively affect overall stand growth.
There is not enough information on current stand conditions, how harvest selections are determined, how habitats will be changed to achieve the goals laid out in the project Purpose and Need.	All information related to current stand conditions and desired future conditions are described in the HMU rationale document. Before a vegetation management project begins, an inventory of the area of interest is completed in each stand to inform a stand diagnosis, which is defined as the process of examination, analysis, description, and delineation of silvicultural opportunities, limitations, and management options of a stand. This stand level diagnosis provides current conditions such as composition, density, age, forest health, and informs the Habitat Management Unit (HMU) analysis. The HMU analysis summarizes stand composition and compares to potential natural vegetation (PNV) to create habitat management objectives and goals described on page 1-20 of the Forest Plan. A rational for habitat objectives in the Sandwich HMU can be found on the project website. Silvicultural treatments listed on pages 9-18 of the EA describe the intensity and expected outcome of each treatment. Commercial thinning and improvement cutting intensities are not defined because they are stand specific. Tools such as stocking charts and silvicultural guides are used to determine optimal residual densities given other considerations such as health conditions, composition, age, future goals, etc. Reference Leak et. al 2014 as an example.
Is controlled burning necessary? The Forest Service has a history of escaped fires.	The attached link provides information on the changes to Forest Service practices since 2022. https://wildlifemanagement.institute/brief/september-2022/forest-service-resume-prescribed-burns-after-90-day-review The attached link provides information on the goals and objectives of USFS prescribed burns and includes information regarding number of prescribed burns that are successful. https://www.fs.usda.gov/features/professionals-prepare-for-prescribed-burn#:~:text=%E2%80%9CPrescribed%20fires%20only%20become%20wildfires,to%20damage%20property%20or%20structures.%E2%80%9D