

Comment Submitted by
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Re Comment: - The value of mature and old growth trees to store carbon and help address climate change are not sufficiently recognized in the current plan. We will never get the old growth forests we need if encroachments on mature growth continue. Once there is some indication that we as a country or as a planet have some small assurance that we have successfully met our climate goals, other goals can be considered. As is required by environmental law a reasonable alternative to the proposed plan must be offered. A no-action alternative is not a reasonable one.

The Forest Service "Forest Carbon Assessment for the White Mountain National Forest in the Forest Service's Eastern Region" January 2024 notes "even though the oldest forests take up carbon more slowly than younger forests, decades of carbon accumulation make these forests hotspots of carbon stocks, especially in the forest floor and downed woody components (Hoover et al. 2012; Hoover and Smith, 2023; Gray et al. 2016). **Yet no changes were made in the plan to reduce the harvest of older growth.** Additional information provided in the "Carbon Assessment" goes on to note "Across all national forests in the Eastern Region harvest has been the greatest disturbance affecting carbon storage since 1990 causing non-soil forest eco-system carbon stocks to be 1.59 per cent lower by 2011 (Figure10.) **Yet no changes were made in the plan to reduce the harvest of older growth.**

Re Comment requesting alternative plans: The forest service replied, "commenters do not propose an alternative." However, it is the responsibility and obligation of forest service with its professional expertise to generate specific alternatives. The forest service has failed to fulfill this responsibility.

Re Comment - President Biden signed Executive Order 14072 on Earth Day in Seattle as rampant fires were burning across the west destroying thousands of homes, thousands of forested acres and leaving air hardly breathable hundreds of miles away. We all know what has caused climate change and we have all been warned of the possible or likely catastrophic effects if we do not act immediately to stem and reverse it. The primary goal of the executive order is clear- carbon sequestration is of utmost importance and old and mature growth forests are one of our very best tools to achieve it.

The service in "Sandwich Management Project – Comment Period Consideration Summary For the Draft Environmental Assessment" notes that "the Forest Service recently announced that all forest plans will be amended to prohibit management of old growth forests." Yet instead of pausing for the amendment, the service is forging ahead with its current plan with the vague assertion that the current plan is "very restrictive." Surprisingly, it refers the reader to the "Carbon White Paper" cited above which notes that harvesting in the Eastern Region has reduced non-soil carbon stocks by 1.59%. The forest service has failed to address its responsibility to comply with the goals of E014072.

Re Comment – Acknowledgment that the White Mountain National Forest is an ecosystem and that small disruptions in several parts can have a large disruption throughout. There is much recent research showing that many of these impacts are just coming to light and not yet fully understood. The plan needs to acknowledge the importance of these studies and incorporate them in a revised plan.

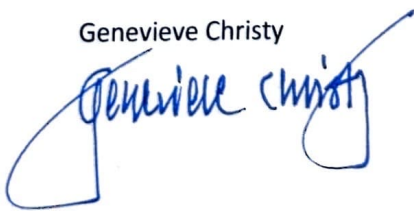
The Forest Service has not provided a thorough analysis of the cumulative impacts of the small disruptions in several areas and the potential damage the larger ecosystem. The statement that the FS has found not adverse impacts from the recent Cold River and North Chatham projects on the environment is vague, lacking details of what information was gathered and over what period of time. The cumulative effects of the disturbance may not be apparent over a short period. In the "Consideration of Comments", regarding FONSI the forest service dismisses articles supporting assertions of damage as not comparable because they were studying different ecosystems as though we will have to incur damage to our ecosystem to prove that it can occur.

Re: Comment: - The assessment begins with this statement: "the purpose of this management area is to provide a sustainable yield of high quality timber products" which you later clarify is to benefit local economies. There could hardly be stronger proof that the 2005 plan is badly skewed and not towards a public benefit. As a case in point, how was the goal of 6 million board feet derived? What net revenue will be generated from each of the three sections, how long before regeneration in these three sections will provide another 6 million board feet and if not again here where else? In short, is the stated harvest of 6 million board feet sustainable in land managed by the forest service?

The plan fails to provide the requested economic analysis; specifically there are no estimates of net revenue after the deduction of costs and no information or analysis to show that the harvesting is in fact "sustainable" in land managed by the forest service. This analysis must be provided to support the assertion that the plan is sustainable.

Respectfully submitted,

Genevieve Christy

A handwritten signature in blue ink that reads "Genevieve Christy". The signature is written in a cursive style with a large loop at the end of the last name.