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Organization:

Title:

Comments: Dear USFS and Saco District Team,

Below are four areas in which I have many questions regarding the proposed action:

#### 1. Scenery Management Concerns

- a. How will the community be notified of viewshed analyses and get copies of the proposed impacts? On zoom, we were told that views from summits and other vistas were to be analyzed, and impact minimized.
- b. How will the USFS take community concerns over the visual impacts into consideration?
- c. If scenery management goals are sidelined and it becomes apparent that the impacts are far greater than those presented, how will the USFS repair this with the community?
- i. How can the community engage with the district to create a "stop work" protocol if the plan is being ignored to the effect of greater degradation?
- d. In the Q&A, a USFS rep mentioned that the likely visual impact to Ferncroft / Wonalancet will be minimal due to its high rating from a "scenic integrity perspective"; can the public receive a clearer definition of what this means? What are the ratings and which viewsheds are protected and to be included in this analysis? Blueberry Ledges? Mt. Katherine? Wonalancet Intervale from 113a? Ferncroft Intervale?

#### 2. Potential Use of Herbicide

- a. In the Zoom Q&A, the question of herbicide use was brought up and the district's spoken response was largely that herbicide use is commonplace in forest service practices and occurs at the base after cutting. The later-published online summary of the Q&A then heavily downplayed the likelihood of herbicide use.
- b. Herbicide use in our watershed is not something the community takes lightly.
- c. Under what scenarios would glyphosate (AKA "round-up") be used? How about triclopyr? How will the community know and track the types, locations and amounts used?
- i. While the EPA currently finds that there are no risks to human concern with glyphosate "if used according to label", how would the community be able to ensure that herbicides are used in accordance with label specifications?
- ii. The EPA has a history of making corrections on such stances, and communities have been left devastated with no way to remediate their soil and watershed. This can have life altering and/or fatal human health consequences. Just last month the EPA announced new drinking water advisories on polyfluoroalkyl substances (PFAS), after long holding the stance that they were safe. Now linked to various forms of cancers, neighboring small farmers are being forced to close shop at major personal economic and regional environmental losses.
- d. Ecological, historic, and contemporary importance of the watershed:

i. The health of the Kelley Brook, Wonalancet Brook, Whittin Brook and their tributaries is critical to the unique ecological significance of these isolated woods to wildlife (black bears, moose, bats, cat, birds, etc.).

ii. Steele Farm in Wonalancet sits upon some of New Hampshire's most pristine soil, the base upon which crop, produce, and livestock have helped sustain this community for centuries. Even as portions of the historic hayfield have turned to milkweed, these areas are a proven haven for the increasingly at-risk monarch butterfly. To introduce herbicides into the Intervale's surrounding hills would be a serious and ecologically unsound decision.

iii. Protecting the watershed is a key reason that the families who own the adjacent woodlots have kept them herbicide free and undeveloped for generations.

iv. We spend our lives swimming in, drinking up, and relying on this water!

3. Is this an ecologically or economically driven harvest?

a. Will the cost of the ecologically necessary management practices be funded by the harvesting of economically desirable trees?

b. In other words, would revenue from the sale of high value birch and oak, harvested from areas 39 and 40, be used to justify the cost of the ecological mission, addressing the overgrown and diseased American beech stands? If so, I would just as soon see those hardwoods stay standing as their carbon sequestration value is significant and having more of these hardwoods is a goal of the proposed action.

c. Is there an incentive in this structure of this plan to cut high value trees that are not ecologically out of place, to have the proposed action completed?

4. Carbon and Climate

i. What tools is the USFS using for carbon assessment?

ii. What is the carbon value of the proposed harvest?

iii. I was disappointed that while your team recognizes the climate emergency, and clearly cares deeply about the health of our planet, this is apparently not even a factor in this plan. I am concerned that this district takes the view that our country's forests are not playing a positive role in the larger climate picture and would prefer to "pass the buck to" and blame the fossil fuel industry.

I appreciate the time and thought that goes into considering and responding to these questions and concerns. Please know that your time and consideration is valued. I understand the importance of some management action in our area but feel there is a dire need for more public information.

Thank you for the work you've done managing the control of this spring / summer's fires.

Sincerely,

Benedict Semmes

3338 Chinook Trail

Wonalancet, NH 03897

Images shown in attachments.

ATTACHMENT: The historic Wonalancet Intervale 113a vista will be heavily degraded by harvest areas 35, 37, 36, 39, 46 and 40 (shown above in shaded areas).

ATTACHMENT: Wonalancet Intervale and Farm in 1910

ATTACHMENT: Indirect Effects of the Herbicide Glyphosate on Plant, Animal and Human Health Through its Effects on Microbial Communities; peer reviewed article.

SEE ATTACHMENT/LETTER: "The historic Wonalancet Intervale 113a vista will be heavily degraded by harvest areas 35, 37, 36, 39, 46 and 40 (shown above in shaded areas)"

SEE ATTACHEMT/LETTER: "Wonalancet Intervale and Farm in 1910."

ATTACHMENT: Peer reviewed science "Indirect Effects of the Herbicide Glyphosate on Plant, Animal and Human Health Through it's Effects on Microbial Communities"

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