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First name: Isaiah

Last name: Thompson

Organization:

Title:

Comments: To the United States Forest Service and Saco District Ranger and Team,

I am writing to comment that the proposed action, as it is currently conceived and expressed in the relevant documentation, especially the Draft Environmental Assessment (EA) released on July 31, should not take place; and that the U.S. Forest Service (USFS) should either drop this project altogether or go back to the drawing board and drastically reconsider its proposed action.

I submit these comments, concerns and questions to USFS with the hope and expectation that they will be taken into serious consideration as the USFS considers this extremely consequential action.

I would also like to submit my unequivocal support, endorsement and agreement with the public comments submitted for this comment period by Standing Trees and its executive director, Zack Porter. Please consider and note that every comment made by Standing Trees is also made by me via this statement.

I have had the great privilege of knowing the Sandwich Range of the White Mountains National Forest, hiking its trails and enjoying its unique and precious beauty, since I was in utero and throughout my life since.

My ties to the Sandwich Range, the project area, and the surrounding communities are deep. My parents live on Ferncroft Road, which is the proposed nexus of logging activities in the Wonalancet area. My great aunt lives up the road; my aunt and uncle live across the stream. And I am lucky to be able to count so many households and families in Wonalancet and the surrounding area as friends, neighbors and fellow community members.

I am also a proud member of the Wonalancet Outdoor Club (WODC), established in 1898, and whose mission is "...for provision and care of paths, trails and other facilities for persons visiting the White Mountain National Forest and other mountain and forest lands; regarding these lands, to promote their conservation and the enforcement of the laws regarding their conservation and use, to promote communication between their owners and the public on these issues, and to promote discussion and education on all these matters[hellip]"

The WODC acts as a steward of 52 miles of trails through the Sandwich Range. The trails we maintain draw thousands of visitors annually from across the state, the region, the country, and indeed the world. Such is the importance and uniqueness of the precious resource that is the forests of the Sandwich Range.

The USFS has been negligent in its preparation, planning, presentation and consideration of this proposed action. The Draft EA is so sorely lacking in specific information as to be insulting to the public it is supposedly meant to inform. If the USFS really cared about public input, it would have A) done far more public outreach than the feeble efforts thus far; and B) would have made a far greater effort to do its due diligence and produce a good faith effort at addressing potential concerns upfront.

The Draft EA is sorely lacking in specificity in virtually every area it considers and attempts, failing, to address. If the USFS actually intends to convey useful, actionable information it should go back and prepare an EA that elucidates the relevant information, rather than obfuscates it as does the current EA. I will expand upon and illustrate the basis of these comments in detail below.

If my comment is long, I make no apology. It's shorter, anyway, than the woefully insufficient Draft EA the Forest Service itself submitted to the public.

My reasons for commenting in opposition to the proposed action are numerous.

It is important to note that in addition to the lack of specific information in many areas as detailed below, the Assessment and plan offer no meaningful consideration of alternatives, including no action. Council on Environmental Quality (CEQ) regulations require that federal agencies, including USFS, shall [ldquo]inform decision makers and the public of reasonable alternatives that would avoid or minimize impacts or enhance the quality of the human environment.[rdquo]

It is additionally of high concern that the proposed action is being implemented under the now-outdated 2005 Forest Service Plan, and that plan does not reflect current conditions or current priorities. Specifically, the plan fails to address, incorporate or consider Executive Order 14,072, signed by President Joe Biden, regarding the preservation and protection of America[rsquo]s forests, especially mature forests like the ones in the proposed action area.

It is not the fault of the public that the USFS has failed to comply with federal regulations and update its own plan, or that it proposes this action under an outdated plan. Had the USFS done its job and updated its plan according to the law, it is entirely unclear that the proposed action, which proposes logging mature forest, would have been proposed in the first place.

The Environmental Assessment acknowledges that a main purpose of the proposed action is the commercial harvest of timber, projected at 6 million board feet. The Assessment contains no description of whether or how the revenue generated from this sale would benefit the Sandwich Range, its trails and recreation opportunities, or the forest.

Meanwhile, the Assessment offers no meaningful detail regarding the expected impact on the trails and trail use, or any precautions or procedures that would be undertaken to protect and/or restore the area[rsquo]s recreational resources, including the integrity of the trails and access to the trails.

The proposed action begs the larger question of whether the many recreational resources of the planned activity area should be sacrificed to facilitate logging operations in a forest so heavily used for recreational purposes.

I request that further evaluation and assessment be undertaken and more information made available about the anticipated and/or potential impact of the proposed action on recreation, specifically:

- * Impacts of the proposed action on recreational use of the Sandwich Range forests.
- * Impacts on access to hiking and skiing trails
- * Impacts on the trails themselves, potential relocations of trails, and the present apparent absence of buffer zones around trails.
- * Impacts of partial parking lot closures on visitation to the Sandwich Range and its trails, as well as impacts on both visitors and the surrounding communities
- * Impacts of noise on trails, visitors and the surrounding communities
- * Impacts of the proposed action on the beauty, scenery, view sheds, and integrity of the trail systems affected
- * Locations and impacts of planned reconstruction and new construction of landing sites
- * Impacts of landing sites on the trails and surrounding environment.
- * More detailed timelines and locations of activity related to the proposed action.
- * Lack of detailed analysis of alternatives.
- * Lack Recreation Plan
- * Lack of description of any benefits from proposed commercial timber harvest to Sandwich Range, its trails and resources.

Recreation, Trail Use, Cultural Resources

Recreation is a major use of the project area, drawing thousands of visitors every year. Yet potential impacts to recreation are largely absent from this Assessment.

As noted earlier, the USFS has removed recreation management from the plan and intends to address it as a [ldquo]separate project.[rdquo] Meanwhile, the Assessment contains no reference to the USFS Recreation Opportunity Spectrum (ROS), whose purpose is to inform the Agency in decisions that affect recreational use on its lands.

I have numerous concerns and outstanding questions regarding the impact of the proposed project on the hiking and skiing trails in the project area.

The proposed project area is located on, along or adjacent to at least four trails maintained on behalf of the USFS by WODC: The Cabin Trail, Old Mast Road, the Big Rock Cave Trail, and the Kelly Trail. The project area is also located on, along or adjacent to several trails near Mt. Israel, including the Liberty Trail and Brook Trail.

The Draft Environmental Assessment fails to include any specific or even general information about potential impacts to these trails. Meanwhile, it describes no buffer zones along any of these trails or indeed any trails in the Sandwich Range, nor any indication that buffer zones were considered or evaluated.

I request that the USFS conduct an evaluation of impact on the trails in and around the project area that includes a consideration and evaluation of buffer zones to protect the integrity of the trails and the recreational experience they provide to thousands of visitors every year.

The only description of buffer zones in the Report is as follows:

[ldquo]All cultural resources are located outside project activity areas. Cultural resources near timber harvest units, skid trails, landing areas and roads were flagged for avoidance in the field as heritage reserve areas with a fifty-foot buffer where no heavy equipment will be allowed to enter.[rdquo] (27)

The Assessment does not specify what constitute said [ldquo]cultural resources,[rdquo] nor whether trails are considered a [ldquo]cultural resource,[rdquo] [mdash] although it might be presumed that they are not, considering that several of the trails maintained by WODC are located decidedly within the project activity areas.

The Report does not state what [ldquo]cultural resources[rdquo] were considered or identified for the report, nor does it state which [ldquo]cultural resources[rdquo] were flagged or where they are located.

Meanwhile, the Report makes the categoric claim that [ldquo]The proposed action will not have significant impacts on the quality of life or recreation experiences of forest users in either the short or long term.[rdquo] (32)

What is the basis for this conclusion? The proposed action will occur on, along or adjacent to at least six popular hiking trails in the Sandwich Range region, and, as stated before, the Assessment mentions no buffers between the proposed actions and these trails. Meanwhile, the Assessment refers repeatedly to anticipated skid crossings with trails, in some (unspecified) cases potentially requiring (unspecified) trail relocations. And the actions will occur over a 5 to 10 year period. It would seem to stand to reason that the proposed action will have significant impacts on the quality of life or recreation experiences of forest users, at least in the short-term and possibly in the long term, depending especially on the nature of the actions being undertaken on, along or adjacent to these trails.

Additionally, the Assessment does not appear to consider at all the impact of the proposed action on the pristine beauty and quality of present forest habitat relatively undisturbed by human activity. The Assessment does not

consider the impact of hauling operations, skid crossings, landing sites etc. on the quality of peaceful forest habitat that attracts so many visitors to the area.

I request that more evaluation be undertaken and more information made available about the anticipated and/or potential impact of the proposed action on recreation, specifically trail use.

I am additionally concerned about the general lack of further information regarding recreation included in the Assessment.

The Assessment states:

[ldquo]Note that early versions of this proposal and associated maps included actions related to recreation management; however, those actions have been removed from the proposal and recreation management will be analyzed as a separate project. We prepared this environmental assessment and finding of no significant impact to evaluate the potential impacts of the proposed project and activities. (1)[rdquo]

I am very concerned that the fact that recreation management has been [ldquo]removed from the proposal and [[hellip]] will be analyzed as a separate project[rdquo] makes informed comment about the ramifications of this project on recreation difficult if not impossible.

I request that USFS include a full recreation management plan, with opportunities for public input and public comment, as part of this proposal.

Roads

The Draft EA states that sixteen miles of roads will be either upgraded, constructed or otherwise put into use for the proposed action. Yet the EA contains nothing by way of evaluation of the impact of this heavy road construction on the environment, on the trails, on access to recreation, or frankly anything else. This is a severe deficit of the EA and requires further evaluation assessment and reporting to the public.

As stated by Standing Trees in their comment: [ldquo]The Draft EA fails to show how many units proposed for timber harvest will be accessed, suggesting that the Forest Service has failed to account for the access that will be needed for proposed activities or is instead failing to disclose those access needs.[rdquo] I endorse this comment.

Landing Sites

I am concerned about the lack of information provided in the Draft Environmental Assessment regarding landing sites.

The Assessment states:

[ldquo]Five existing log landings would be reconstructed and expanded, and up to five new log landings would be constructed to support vegetation management activities. Log landings would be approximately 0.75 acres or smaller. Final locations of log landings may be modified during project layout subject to applicable forest plan standards and guidelines, best management practices, and other site-specific requirements. Consultation with resource specialists would occur as needed. (7)[rdquo]

The Assessment provides no further detail regarding where the existing landing sites, to be [ldquo]reconstructed and expanded[rdquo] are located; nor does it provide any information on where the additional five new landing sites will be located.

Without such information, it is impossible for members of the public to properly assess or comment upon the potential impacts of such landing sites on recreational use, on area cultural resources, and on the trails that WODC and other trail clubs maintain on behalf of the Forest Service.

I request that, prior to approval of this proposed action, the USFS provide more information regarding the intended locations, size and environmental impact of these 10 landing sites.

* Parking Lots, Access to Trails

Thousands of visitors annually travel to the parking lots at the Ferncroft and Liberty trailheads to access hiking and skiing trails.

The Draft Environmental Assessment contains only two brief mentions of the action plan with regard to these parking lots:

[ldquo]RE-4 Ferncroft Trailhead parking lot is a year-round lot with extremely high use, allowing access to 10 trails and the Sandwich Range Wilderness and a community cross-country ski area in the winter. Based on safety concerns during timber hauling, one side of the parking lot may be closed during hauling operations in all seasons.[rdquo] (40)

Both the Scoping and Environmental Assessment propose partial closures of the Ferncroft and Liberty parking lots without proposing or evaluating any alternative parking offerings or considering the impact such closures will have on recreational access to the area or the potential for impacts of overflow parking on the surrounding communities.

The Assessment includes no evaluation of the impact of the closure of one side of the Ferncroft parking lot [ldquo]in all seasons[rdquo] on public access to the trails or the potential impact of such closure on parking elsewhere in the region. Likewise, the Assessment contains no evaluation of the impact of the partial closure of the Liberty Trailhead parking lot during hauling operations during the summer.

While the Assessment does limit hauling of timber along Spring Brook and Paugus Road to Monday through Friday and precludes hauling operations on weekends and federal holidays [ldquo]to allow for safe recreational opportunities during the weekends and holidays.[rdquo] it makes no such provisions for hauling along Ferncroft Road, despite the [ldquo]extremely high use[rdquo] that trailhead sees. No evaluation is made of the impact of unrestricted hauling operations at the Ferncroft Trailhead on the public[rsquo]s recreational access to hiking and skiing trails.

Meanwhile, I have serious concerns about the safety implications of heavy hauling operations at these parking lots / trailheads. The Assessment makes no provisions for safety outside of partial closure of the lots. Will speed limits be enforced for hauling operations? What will those speed limits be? What precautions will be taken to ensure the safety of visitors to the trailheads, including children, dogs and infants, given the proposed presence of heavy hauling machinery?

I request that the USFS conduct further evaluation of and provide further information about the impact of the proposed action on the Ferncroft Trailhead and Liberty Trailhead parking lots, access to parking, and access to the trails, impacts on safety and possible safety precautions, as well as evaluate alternative parking opportunities for recreational access to the area.

* Impacts on Trails

The Draft Environmental Assessment makes various references to anticipated impacts of the proposed action on trails without providing any detail about the location, number, size, or nature of these impacts or any evaluation of how such impacting actions will affect recreational use of the trails and area.

The Assessment states:

[RE-3] [ldquo]Skid trail crossings of hiking trails would be minimized. Where necessary, skid trails would cross hiking trails at right angles.[rdquo] (40)

The Assessment provides no locations of such crossings, nor any information about how many such crossings would be expected to occur. Nor does the Assessment provide any evaluation of the impact of such crossings on the trails, including damage to the trails, impacts on erosion, and impacts on hikers and skiers.

The Assessment states:

[RE-7] [ldquo]Hiking trails that coincide with proposed skid and haul roads will be temporarily relocated to allow for safe concurrent use.[rdquo] (40)

The Assessment contains no information about what trails would be affected by relocation, how and by what means they would be [ldquo]temporary relocated[rdquo] or any assessment of the requirements or impacts of such relocation. Trail relocations on trails maintained by WODC have been generally undertaken by WODC. Yet the Assessment provides no detail about how or where USFS anticipates such relocations, nor any indication that USFS has consulted or will consult with WODC on such anticipated relocations and/or pay for such work.

The Assessment makes repeated reference to [ldquo]trail closures[rdquo] (21, 32), but provides no details about whether trails will in fact be closed, which trails might be closed, at which locations or for what length, how long such trail closures would be in place, or what impact such trail closures would have on recreation as well as upon other trails in the system.

Nor does the Assessment contain any information on what, if any efforts will be undertaken[mdash]or by whom, at what cost, on what timeline[mdash]to restore trails damaged or [ldquo]temporarily relocated[rdquo] as a result of the action plan.

I request that the USFS conduct further evaluation of and provide further information about the impact of skid trail crossings and haul roads on trails and recreation.

* Skiing Trails

The proposed action would occur along or possibly on existing ski trails, including a network of popular ski trails maintained by the Tamworth Outing Club and accessed from the Ferncroft Trailhead. The Assessment contains no evaluation of the impact of the proposed action on the use of these ski trails or the safety of recreational users of the ski trails during the duration of the proposed action. Furthermore, the Assessment provides no evaluation of the impact of the proposed action on the safety of skiers.

Meanwhile, FR 337 is currently used by both cross country and back country skiers and is partially groomed by the Tamworth Outing Club for skiing. What accommodations will the USFS make for winter skiing on FR 337 during logging operations?

I request that USFS conduct further evaluation and provide further information about the impact of the proposed plan on recreational access to ski trails in the area of the proposed action.

* Noise

In addition to the beautiful sights and scents the trails in the proposed area provide to the public, recreational users of the trails of the Sandwich Range enjoy the sounds of our forests, from the peaceful respite from the sounds of [ldquo]civilization[rdquo] the trails provide to the abundance of natural sounds of the forest.

The Assessment provides no evaluation of the impact of the proposed action on noise levels, whether on the trails (including not just the trails most directly affected by the proposed action but all of the trails throughout the Sandwich Range); at the trailheads; or in the surrounding communities. Nor does the Assessment provide any details of strategies to mitigate noise during the proposed action. The Assessment contains no evaluation of the impact of noise related to the proposed action on the quality of recreation in the area or on local wildlife which constitutes part of the recreational experience of the forest.

I request that USFS conduct further evaluation of and provide further information about the impact of noise from hauling operations on the project area, the surrounding area and trails, on the surrounding communities, or on wildlife.

* Scenery

The Draft Environment Assessment provides only scant consideration of the impact of the proposed action on scenery, restricting itself to consideration of just three [ldquo]viewpoints[rdquo] in the area.

It states: [ldquo]An initial scenery analysis was conducted to determine key viewpoints which would best represent viewsheds within the project area. Three final viewpoints were selected to assess potential impacts to scenery resulting from the proposed even-aged silvicultural treatments (figure 5). These viewpoints were selected based on the improved vantage and potentially higher visitation by the public relative to other potential viewpoints, as well as their overall representation of the full project area.[rdquo] (22)

An evaluation of the impact on area viewsheds based on just three viewpoints is insufficient.

I request that USFS conduct a more thorough and comprehensive evaluation of the impact of the proposed action on viewsheds in all activity areas.

* Endangered Species

It is of serious concern that the EA makes only cursory reference to the potential impact of the proposed action on the Northern Long-Eared Bat (NLEB).

* Carbon and Climate Change

[rsquo]I say this for the Draft EA: It provides a remarkable example of a way that any agency, company, or individual might justify completely ignoring the carbon and climate change implications of destroying mature forest.

Rather than provide a meaningful or even half-baked attempt at assessing the consequences of logging the WMNF, the EA simply compares the project area to [hellip] the world [hellip] and declares it, by virtue of that comparison, [ldquo]not significant.[rdquo]

As Standing Trees notes in its public comment, a court recently ruled on a similar assertion by USFS, noting:

[ldquo]Under this logic, the USFS could always skirt [ldquo]hard look[rdquo] analysis when doing a carbon

impacts review by breaking up a project into small pieces and comparing them to huge carbon stocks
[hellip][rdquo]

* Soils:

As stated by Standing Trees in their comment: The Draft EA also fails to provide any analysis, discussion and clarity surrounding localized impacts on soil resources. I endorse this comment.

* Wildlife

As stated by Standing Trees in their comment: [ldquo]The Draft EA[rsquo]s discussion of wildlife is inadequate, and the completion of an EIS is necessary to determine the true impacts that the Project would have on wildlife in the area.[rdquo] I endorse this comment.

* Streams

As stated by Standing Trees in their comment: [ldquo]The Draft EA does not describe any potential impacts on perennial streams, nor provides information for the public to evaluate.[rdquo] I endorse this comment.