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Comments: Comment on the Sandwich Vegetation Management Project Draft Environmental Assessment and Preliminary Finding of No Significant Impact.

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Wonalancet

Sadly, I am re-submitting the comments I originally submitted to you during the scoping period. The Draft EA left the major points I raised unaddressed, and the questions I asked unanswered.

This cover letter will treat only conclusions in the Draft EA dealing with the issue of climate change.

I had hoped for a report on progress made by the WMNF and the Saco District pursuant to EO 14072 and the Secretary of Agriculture's Memorandum 10077-004. Perhaps also the results of the required inventory and proposals to "protect, maintain, restore, and cultivate old growth and mature stand characteristics". These would certainly be essential elements of the SVMP, which proposes operation in an area that is -- according to the Draft EA -- 76% mature forest.

It is not just my scoping comments that were not addressed, it appears to be everyone's. Scoping comments were very thoroughly enumerated, but there is no apparent effect on any important element of the plan as described in the Draft EA. It's still commercial forestry as usual, based on an outdated Forest Plan that does not even mention carbon or climate change.

The Draft EA's short "Climate Change and Carbon" section "summarizes the project-level carbon assessment (Colter 2021)." But this document by Colter is not listed in the references, nor is it available anywhere that I can find on the Forest Service Website or on the Internet. There is however a 2023 Report by Patrick Moran, which provides more details about the Forest Service's reasoning.

Unfortunately, Moran's paper concludes: "In summary [the proposed operation] might contribute an extremely small quantity of greenhouse gas emissions relative to national and global emissions." The Draft EA uses the same words.

In solving a lesser problem where there are several possible solutions, it would make perfect sense to choose the one that is easiest or most profitable. But the climate crisis is like no other problem - "The United States and the world face a profound climate crisis. We have a narrow moment to pursue action at home and abroad in order to avoid the most catastrophic impacts of that crisis . . ." [Biden EO 14008] There is no single solution, nor any known combination of solutions, that can save us. At this point we need everything.

I would turn the hardly-enough-to-be-worth-counting logic around. The 6 million bf of forest products the Draft EA promises over 5-10 years is less than 1 one-thousandth of 1 percent of total US forest products consumption. Certainly "an extremely small quantity". So why bother? Why go to all that expense, release all that carbon, risk injuries, antagonize a large regional clientele of hikers, skiers, dog-walkers and amateur naturalists, and waste FS time which could certainly be profitably applied to other projects? Why make such a mess for less than a thousandth of a percent?

Finally, I have to admit that I've spent much of the past week steeped in scientific literature on forests, forestry,

carbon, and climate. My intention, honestly, was to prove to you, Forest Service reviewers, that for every assertion made in the Draft EA, for every reference, there was one equally good or better on the other side. But slowly I came to realize what you probably already knew: that this research takes years and the biology of all these questions remains frustratingly unsettled.

What it comes down to is not questions of science, but a difference of values. Neither the Forest Service -- nor its critics - is likely to succeed in educating away the others' values. So my final comment is this: Neither side is likely to win over the other, but we can listen to each other. The Citizen's Guide to NEPA (Council on Environmental Quality, 2021) describes facilitated "Environmental Collaboration and Conflict Resolution" processes, which they report require less time to produce decisions and less staff time, and improve working relationships and levels of trust. I feel this might be something worth exploring.