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First name: Barbara

Last name: Bloomberg

Organization:

Title:

Comments: Letter attached

To whom it may concern:

I am writing you today as a concerned citizen with a great love and extensive knowledge of the Sandwich Range. I first hiked Mt Whiteface over 50 years ago, and have hiked every trail in the region at least once in recent years. I spend a great deal of time in the woods. I am a hiker, a forest steward, trail maintainer, group hike leader, forest service volunteer, member of WODC, TOC(board), AMC, CMC, and above all, an environmentalist.

I am writing out of concern for the environmental impact and long-range consequences of the current Forest [ldquo]Management[rdquo] Plan. I wish to add my voice to the many who feel that the current proposal for logging in the Sandwich Range of the White Mountain National Forest is misguided and inappropriate at this point in time.

Among my many reasons for saying this:

~The stated plans to cut and remove whole trees appear to be more advantageous to the logging and forest products industries than anything else. Dead trees provide habitat for cavity-dwelling birds, animals, fungi and insects. When they decompose, they enrich the soil, which otherwise may be so severely damaged by logging that it will never recover. They support each other and other vegetation as well as animals and organisms both above and below ground. They give oxygen to the air and they help protect water quality and prevent erosion. We know today that a healthy forest needs trees in all phases of life, from young saplings of various species, to standing dead and decomposing logs.

~The stated benefits of habitat enhancement for wildlife do not make sense. How can you increase habitat by removing trees and destroying or damaging the adjacent forest floor with skidders and other heavy equipment? How can deer and other animals of the forest benefit if undergrowth to feed on and hide in is gone? What happens to small animals, microorganisms and all the life that currently inhabits the soil when sunlight hits areas that were previously shaded?

~How can the recreational value of this area not be impacted? Thousands of man-hours go into maintaining and improving these trails each year, so they can be enjoyed by skiers in winter as well as 100s or 1000s of hikers year-round. Aside from the short-term impact of losing parking space and trail access, the damage caused by heavy equipment going over these trails could take years to remediate, at best. Trails will be especially impacted if the ground is not frozen solid when they go in. Yet the Plan states that there will be no long or short term impact, and heavy equipment can go in fall and spring as well as winter. This makes one wonder how they define impact, or if any requirements will be made for remediation. Can we have a guarantee that damage will be minimized by restricting access when trails are wet, soft or too dry? What is required of contractors to ensure that full remediation will be done where needed, including restoring soils, waterbars and the like, and eliminating erosion where none existed before?

~The plan states that wildlife will benefit from openings in the tree canopy, but what happens when the duff is covered with many inches of slash - shredded tree waste - in clearings created strictly for storing the harvested trees? Will any animals bed down there or come there to find food ? I think not. They will not even want to walk there. The logging yards that are allowed are substantially larger than those in the past, and they do not appear to be included in calculations of area size, location, or remediation requirements. What is the environmental

impact of these areas?

~The trees that are targeted for removal are just beginning to enter the most productive phases of their lives in term of environmental health. In today's warming climate we are better off leaving the trees standing, shading and protecting the soil and sequestering vast amounts of oxygen. A mature, healthy forest is not a monoculture or tree nursery, it is multi-aged and diverse in species. What is the environmental impact of removing them?

~ Erosion and runoff should be considered in the environmental impact study that informs this plan. Trails, waterways, wetlands may be impacted, and water quality diminished, with long-term consequences. Soil does not easily recover and its importance cannot be overstated. The contractors who do this work need to be held accountable with written guarantees that they will restore all ground areas to pre-logging condition, and the long-term impact of the logging operations be minimized. Realistically, this is probably not possible. Just covering areas with wood chips does not accomplish this goal; soils must be taken into consideration. Have the consequences of logging on erosion and water quality been evaluated in any environmental impact statement? If not, why?

~ Regarding Visual Impact, let's state the obvious: there will be visual impact, and no consideration is made for this. Clearcut and even cluster areas especially will be visible from above for decades after the loggers are gone. In logging yards the chipped slash remaining from tree removal is likely to be a foot or more deep, as it is in other areas of the nearby forest that have been cut in the last year. We were told that it will be nicely leveled off to reduce visual impact, but what is the environmental impact of these areas? How is it beneficial to wildlife or encouraging revegetation (if any) when all remaining habitat and food sources are covered, soil smothered, and remaining peripheral trees unstable? It is difficult to even walk in these areas, and it is impossible to imagine anything growing there for a long, long time. Will there be regrowth when seed cones and acorns fall on a deep layer of undecomposed wood chips? I think not.

~The potential for use of herbicides should be eliminated from the proposal. There seems to be no legitimate justification for their use in terms of forest health. Granted, this means that some [undesirable] species will continue to flourish, some trees might suffer from disease or insect damage, and it may not be as easy for loggers to clear areas that might be prone to undesirable regrowth. In such cases, thought should be given to deny cutting in areas of trees that are prone to undesirable sapling growth and consideration given to the long-term benefit of the forest's health, rather than strictly ease of operations for the logging companies.

~Too much in the plan is NOT stated. What is the actual acreage that will be cut, when clearing access and logging storage yards are taken into account? What is the size and environmental impact of the logging yards? Buffer zone size is [to be determined,] evidently by a subjective process about which the Forest Service personnel are very vague. With little underbrush in these areas, one can see far past what these buffer zones are projected to be. How will this be addressed? How can we trust that the recreational and aesthetic value of these areas will not be impacted? If they are impacted, how will the damage be remediated?

~And finally, burning of any kind, controlled or otherwise, is a bad idea, although it was considered for many years to be helpful. With warming temperatures and air quality reduced significantly (a recent report states that air quality in our region is down 25% from what it was in the best years after the Clean Air Act) burning should be avoided at all costs. Because of climate change, our forests may no longer be considered immune to uncontrolled forest fires.. And again, trees can release vast quantities of oxygen if allowed to grow. Burning should be removed as an option for logging operations.

Why does it seem that this plan is being pushed through before regulations change to favor diverse mature forest over monocultures created by the logging industry for their benefit? The current plan is based on practices and knowledge that were current over 20 years ago. The world has been changing rapidly since then. President

Biden's call to stop the destruction of mature forest should be taken into account (FS Executive Order #14072) and a new Environmental Impact Statement be written to guide this and future Forest Plans. A long-term view is needed, and the "big picture" of overall forest health must be prioritized. We need to be able to look back and be proud that we've managed the forest in the best ways possible. If not, we will only have regret. The damage cannot be undone. We need to ask ourselves: what are best practices for the forest to remain healthy in our lifetimes, and for our children?

Forest Service employees have done a good job of presenting a well thought out plan, based on the parameters they are given. Criticism of this plan is not a criticism of these individual employees. You can't change the rules, but you can choose not to play the game. The choice for you now is either doing the wrong thing by going forward with this plan and letting the logging companies have their way, or doing nothing. I urge you to do nothing: put the current plan on hold NOW and wait for the science to be updated before any logging contracts are awarded.

The value of a truly mature forest cannot be overstated. Please allow these special areas to remain.

Thank you for your consideration.

Sincerely,

Barbara Bloomberg

Tamworth, New Hampshire