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Organization:

Title:

Comments: 10/23/2023

Firstly, I am grateful to Ranger Innes and his team for taking the time to visit with our community on the September field trip, and for both him and USFS Landscape Architect Kenneth Allen visiting with me over Teams to discuss the scenery management standards, guidelines, and plan.

The later discussion helped me better understand the scenic considerations made, despite the alarming official wording that these harvests will not be visible from 113a or Mt. Katheirne. I still feel strongly that they will be visible with the common sense understanding of what every you can see is visible. I understand that the EA uses the USFS' definition of visibility: you must be able to see >4 acres per individual clearing from a designated scenic area, for it to be considered "visible".

While the USFS is allowed to clear 20% of the designated group selection acreage in Ferncroft, I was told you may very likely log less. I'd like to put on record that group selections totaling 20% of ~350 acres in units 36, 39, 40 would open over 60 acres of forest floor. While none of these cuts will be >4 acres the collective impact is substantial, even through dozens of smaller 1-2-acre cuts. I am very concerned about that percentage of clearing.

The images below show what a harvest of just half the allowable amount might look like from Mt. Whiteface.

2 Images in attachment: Potential View of what 10% harvest would look like from Mt. Whiteface

While Ken was right to point out that I do not have LIDAR data to measure the heights of the existing vegetation to the forest floor, I feel strongly that if he had taken the moment to look at my polygon acreages, and follow my process step by step, that he would have, albeit unofficially, agreed that my approximation was not a dramatized reframing of potential impact. I recognize it is possible that the clearings shown could be slightly less visible around the edges, but there could also be twice as many clearings. I view this as a moderate representation of potential impact. Given what is allowable, the impact could be much worse (2x the patches). At the Ranger's discretion the impact could be less than this.

I urge the team to continue leaning to the side of less is more here.

The public is very interested in seeing what a reasonable alternative to this plan be; Will your team consider using any silvicultural prescriptions for increasing old-growth structural attributes? Why not? Will any harvested material be left on the floor to contribute to the soil? Or will it all be sold for pulp/lumber?

What can be done to ensure that the gates are kept closed to other unauthorized motorized vehicles?

Secondly, please share information with the public regarding accountability for cleaning up of litter. Attached are photos of fuel cans that were left behind during the last harvest and were never cleaned up. These photos were taken on the day of the field trip, along one of the roads that is set to be restored.

Images in attachment (2)

At this time, I remain opposed to the harvest as planned. While the Ranger's guidance may ultimately be less than what the standards allow, I still feel that it would be best for some of the team's "measures of restraint" be

publicized as a show of good faith, to ensure public safety, and to acknowledge the steps that are being taken to protect scenic integrity even in areas where there is not an official requirement to put so in writing.

Thank you,

Ben Semmes

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Images are in attached .pdf.