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Title:

Comments: I am writing to submit my second public comment on the Sandwich Vegetation Management Project #57392.

Having already submitted the bulk of my comments, I hope to keep this comment briefer than the last, though it will probably not be particularly brief; I guess I'll take my time exercising my right as a member of the public to weigh in on this deeply flawed process. I thank you and your staff, sincerely, for your time and effort in taking my comment and the hundreds of others who have taken the time to comment, into consideration.

I would like to state my opposition to the proposed action. I ask the USFS to cease action on this plan as soon as possible, ideally immediately, and to return to the drawing table, so to speak, in reconsidering any action at all, let alone the proposed action.

I write as an individual, with a long-standing and heartfelt connection to the Sandwich Range, as described in my first comment; but I also write as part of a group of individuals, many local residents of the proposed action area, who share the position that the proposed action should be tabled and reconsidered from scratch.

You can see our collective position on the proposed action, condensed into about two pages—which I respectfully submit for the public record as representing my own opinions—at the following website:  
<https://sites.google.com/view/protectsandwichrange/>.

While I'm citing opinions I officially endorse, I would like to re-state my unequivocal adoption of the 8/30/23 comment by Zack Porter, on behalf of Standing Trees, as supplementary to my own comments. In case there's some confusion about this, I'm saying that I raise every concern, point, consideration, objection and rebuttal that is contained in the relevant document, and I expect the USFS to consider my comment to include the comments submitted therein, to the extent I be recognized in the Objection process as having raised said concerns.

And I don't have a lawyer, so please don't mess with that.

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#### Additional Comments

My understanding of this project has evolved with time and with new information, including information provided by Ranger Innes and his team over the past weeks and months.

I believe my recent email to the Tamworth Exchange and Sandwich Board accurately represent my present opinions, concerns, objections, and deep misgivings about the proposed action. I include them here for the public record as an accurate representation of my public comment:

Dear Friends,

I'm writing on the eve of the closing of the U.S. Forest Service (USFS) second public comment period regarding the proposed commercial logging operations in the Sandwich Range of the White Mountains National Forest (WMNF). All new comments must be submitted (link here) by 11:59pm, October 23 EST.

Anyone can submit a comment, and comments do not have to be long, although they should be as specific as possible, for a very important reason: The next phase of this project will be an "Objection" period, in which only those who submitted public comments will have standing to "object" to elements of the proposed action; crucially, it's our understanding that the public can only raise objections based on the specific items they identified in their public comment. So: It's important in commenting to be as specific as possible in your comments.

(If this seems maddeningly bureaucratic and designed to prevent ordinary people from expressing themselves, well, I could not agree more; but it's what we're stuck with for now.)

I'm writing to respectfully encourage and request as many of you as possible to submit public comment (or another one, or the same one, if you already have) either in opposition to the plan altogether, or—as I'll be doing in a second public comment—commenting that the USFS should pause in moving forward with its current plan and go back to the drawing board to wholly reconsider any action. If you haven't submitted a comment already, doing so is relatively easy, and can be done online. (See below for more details and guidance about commenting).

Please feel free to use anything in this post, or anything from our (much shorter!) website to inform your own comments.

I know this is a rather long post; but because specifics are so important here, and because there has been a lot of confusing information in this entire process, I felt it important to lay out the case I and others are trying to make in some detail. I've tried my best to be precise in my language and cite relevant documents, language and public statements. Like everyone else here, I'm just an ordinary civilian trying my best, with the help of my colleagues in this, to sort through the mess the Forest Service has dumped in our collective laps (that's an example of my own opinion!).

In brief: The USFS proposes to contract out the commercial logging of some 6 million board feet of timber (a conservative estimate—since the USFS has not provided this information—suggests this is in the order of tens of thousands of trees), across 650 acres in the Sandwich Range of the WMNF. The cuts would occur along or adjacent to at least six hiking trails and numerous skiing trails in the Sandwich Range, with most of the timber being hauled out through the Ferncroft parking lot in Wonalancet, and the the Liberty Trailhead at Mt. Chocorua.

This August, the USFS released a Draft Environmental Assessment (I would attach, but the Exchange won't let me, so you'll have to find it with this link or email me for a copy), with a finding of "no significant impact" from the proposed action—a finding that will allow it to proceed much more expeditiously, should that conclusion be solidified in its "final" EA.

I am part of a group of people (see our website / info here) organized largely by the Wonalancet Preservation Association (WPA)—most local residents, but others, like me, non-residents with a deep connection to this place and this forest—who have come to the conclusion that the USFS' current plan is deeply flawed and could do great damage to our beloved forest, trails and the pristine beauty and ecological integrity of the Sandwich Range.

We are not opposed to logging in general, nor are we opposed to responsible management of the forest; on the contrary, we want to make sure that any forest management conducted by the USFS be of the highest quality and be done according to modern standards of forestry that take into account new science and the new realities of our time, as well as new policies being adopted by the USFS itself (more on that in a moment).

We are asking that the USFS pause this project and reconsider it in light of various factors, including new

executive orders from the White House, as well as insufficient evaluations of all kinds of impacts this project could or will have on the integrity of the forest and its value to the public.

## The Forest Service Is Purposefully Ignoring New Federal Orders To Prioritize the Protection of Mature Forest On Public Land

In April, 2022 the Biden administration issued Executive Order 14072, which prioritizes the protection and preservation of old growth and mature forest on public federal land [mdash] exactly the kind of mature forest that exists throughout the proposed project area. (I would add here that this is in no way an attempt by me to engage in partisanship; I'm writing to try and protect our forest, not the current president, and I hope and believe that many of us, regardless of political affiliation, share that goal).

The significance of this order should not be understated. This isn't just a technicality: The executive order represents the codification of a much bigger and broader change in how we, the American public, are thinking as a society about the precious resource that is our national forests and how that resource should best be managed.

Since its inception, the USFS has had a mandate to preserve forests at least in part for the purpose of commercial logging. And there were some good reasons for that historically. But today, in 2023 and really for many years, ecologists, foresters, scientists and we, the public, have been rethinking and re-evaluating the significance of these mature forests[mdash]in light of climate change, but also in light of new ecological science informing forestry. I would argue our appreciation of uncut forest as a natural and recreational resource has changed as well. Does anyone honestly think the highest and best use of the White Mountains National Forest is as a commercial timber store?

The USFS Sacco District Ranger's team, the group leading the proposed logging action, is by its own admission disregarding Executive Order 14072 as it proceeds with the proposed cuts across nearly 650 acres of forest land.

In fact, the section of the recent Draft Environmental Assessment, titled [ldquo]Relevant Executive Orders[rldquo] contains no mention whatsoever of this order.

I find it highly suspicious that the excuses for ignoring this order that have been offered by Sacco District Ranger Jim Innes in public in recent weeks [mdash] I[rsquo]ll get to those in a moment [mdash] weren't echoed in print in the Draft EA, perhaps because they are weak and legally tenuous.

Regarding those excuses: Sacco District Ranger Jim Innes has repeatedly and publicly said on the one hand that his office lacks [ldquo]guidance[rldquo] on the executive order; and on the other hand has mischaracterized the nature of the order, repeatedly suggesting it merely calls for an [ldquo]inventory[rldquo] of mature forests, rather than acknowledging it also calls for the protection and preservation of such forests.

In the recent USFS meeting before the Tamworth Selectmen, Mr. Innes said (Youtube video, minute 8:00):

[ldquo]So really what that executive order talks about is inventorying old growth. And then it has a whole section where it talks about sustainable forestry and talks about stopping international deforestation. And so until that executive order is turned into, like, an actual policy and there's direction, [hellip] they're not telling us to do anything. So it's, I can't make up policy.[rdquo]

In fact, the executive order makes repeated reference to not just inventorying but "conserving" old growth and mature forest. (There is no old growth forest in the proposed action area; most of the area is, however mature forest).

What[rsquo]s more, the nonprofit Standing Trees documented in its own public comment on the project (again, I

would attach but too large; email me for a copy) that the USFS sent regional foresters like Mr. Innes's team a memo in April, 2023 stating that: "We will shortly issue guidance on using this information," referring to EO 14072 (see Standing Trees comment, attached, page 17).

Meanwhile, if Mr. Innes and his team still lack guidance on the executive order — that's all the more reason to pause, halt and/or reconsider this project, not move ahead with a major cut of mature forest while his office lacks guidance on the USFS policy towards doing so.

My own personal suspicion is that the USFS Sacco District is trying to get this done before guidance does come down, guidance which very well might strongly discourage or even prohibit exactly the project they are hurrying to push through now.

Recreation? What Recreation?

Anyone remotely familiar with the Sandwich Range, let alone the White Mountains National Forest itself, knows that it is a major recreational resource, drawing tens or hundreds of thousands of visitors annually to enjoy its trails and beautiful forest

The USFS acknowledges this as well, with Sacco District Ranger Innes' team noting in the recent field trip that the area is "a big recreational forest."

It's rather ironic, then, that the Draft Environmental Statement's finding of "no significant impact" to the area barely considers recreation in its analysis. In fact, Mr. Innes and his team intentionally removed an evaluation of impact on recreation management from the Draft EA.

The Draft EA states this on page 1:

"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."

When I asked Mr. Innes why this crucial piece of the analysis was removed from the study, during a recent "field trip," held by USFS, Mr. Innes' answer was, in so many words, that including it would have made the EA process more complicated.

I have no doubt that's true! But it hardly justifies essentially ignoring the impact of this proposed logging on the quality of recreation in the area. On the contrary, it shows why the finding of "no significant impact" is lacking in context and analysis and should be wholly reconsidered.

Let us just imagine the impact that this logging will have on the hiking experience alone. While the Draft EA states nothing about potential buffers from logging for the hiking trails, Ranger Innes has stated that trails buffers will be only either 33 feet or 66 feet in distance — meaning the logging will extend to essentially right next to the trails — an impact that will last not just for years but for a generation or more. I would call that a "significant impact," wouldn't you?

And that's just one example. The impact the proposed logging will have on the recreational experience includes access to the trails, which may be temporarily closed due to logging, the shutting down of half of the Ferncroft parking lot to allow logging trucks to come in and out, the creation and recreation of landing sites to store the timber, the creation of new roads, the impact of skid trails, the noise associated with the project ... the list goes on and on — yet the Draft EA contains only a tiny handful of mentions of any of these factors, and virtually nothing about their potential impacts on recreational use of the forest.

To essentially ignore the recreational impact of this plan and at the same time state it will have "no significant impact" is sloppy and/or negligent at best and, in my opinion, highly disingenuous.

#### The Diseased Beech Cover Story

On the recent [ldquo]field trip[rdquo] to the Ferncroft parking lot and a nearby area of planned logging, Mr. Innes and his team showcased a stand of diseased Beech trees, explaining that the removal of diseased Beech as a major objective of the project.

While there is healthy disagreement among knowledgeable folks over whether the Beech disease is, in fact, a problem that warrants cutting, I would argue that either way, the diseased Beech story is serving as a cover for a much larger logging project than the USFS is acknowledging out loud, and one that will involve extensive commercial logging that has nothing to do with diseased Beech.

Complicating everything is that the USFS refuses to say how much revenue they expect to raise from bidding out the contract to log the Sandwich Range.

However, it seems from various conversations I[rsquo]ve had with folks knowledgeable about forestry that no one thinks that cutting a bunch of diseased Beech will possibly make for a profitable logging operation[mdash]and because this is being bid out to private industry, it must be profitable for loggers to want to bid[mdash]or yield the anticipated 6 million board feet of timber.

That would lead us to ask: What else is being cut[mdash]and why? Is the forest management component of this project acting as cover for the potentially much larger commercial logging component of the plan?

Unfortunately, we can't look to the USFS environmental assessment to answer those questions, because yet another piece of the puzzle noticeably left out in the Draft EA is a description of the species and number of trees to be cut. Without that information, we have no way of knowing what the USFS is really planning here, or to what extent its purported motivation of forest management is undercut by, or hiding, a larger commercial logging operation whose purpose is to generate private and public revenue from mature timber harvest.

#### Meaningful Consideration of Alternatives and Revenue Incentives

The USFS is required by federal environmental law to consider and offer [ldquo]reasonable alternatives[rdquo] to its proposed actions.

And yet the USFS has provided essentially nothing, at all, by way of alternatives (reasonable or not), disposing of this crucially important part of the Environmental Impact analysis in a few meager paragraphs under the heading [ldquo]Consequences of No Action. (p. 18)[rdquo]

It states that taking no action, the only alternative being considered, would result in [ldquo]lower diversity of tree species, ages, and structures in the project area and the Sandwich Habitat Management Unit overall.[rdquo]

And then it states:

[ldquo]Taking no action would also mean that funds generated from timber sales would not be produced which are utilized in the area in which harvests occur to address resource concerns and improve transportation and recreation infrastructure. While generating funds is not a purpose or need of the project, it would not occur without action.[rdquo] (18)

The documentation speaks for itself: Despite representations by Mr. Innes to the contrary, there is a connection between revenue from the project and the finances of the Forest Service.

The Sacco Ranger team has repeatedly asserted that this action is not motivated by financial considerations. However, the language in the Draft EA exposes the reality that USFS rangers operate under institutional incentives and/or pressure to facilitate such revenue-raising operations, and that at least some of the revenue from the overall action will be available to the USFS Sacco Ranger District to be used for various Forest Service activities, as acknowledged by Mr. Innes himself during the field trip.

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Given the little time left before this second public comment period closes, I'd better end it here.

I thank you all for reading, hope you will consider submitting comments, second or third comments, or, if nothing else, re-submitting your initial comment for the second comment period.