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Comments: I write to register my strong objections to the Sandwich Vegetation Management Plan [SVMP] as now proposed. I filed comment previously on August 28, 2023 and October 19, 2023. The following are my main objections, which reflect the fact that the subjects I commented on before have not been addressed. I urge the Forest Service to withdraw the proposed Sandwich Vegetation Management Plan and let the forest grow to be enjoyed by the public.

1. No planning for recreation management. The Plan still does not include any plan regarding recreation management. The area proposed for cutting is heavily utilized by the public for hiking year-round, and, in addition, for cross country skiing and snowshoeing in the winter months. While the Forest Service promised to produce a plan, it has not done so. The excuse given is "in the planning process the number of trails we were going to include exceeded the project area boundaries and for simplicity we decided to analyze the trails under a separate analysis." That excuse cannot be acceptable because the separate analysis HAS NOT BEEN DONE. Those of us with homes in Ferncroft are acutely aware of the intense use of this part of the forest for hiking. Hundreds of hikers park in the Ferncroft and Liberty lots each week and then hike throughout the area. The trails are not only used by local people but attract people from the entire Eastern seaboard and Quebec. The failure to take into consideration the impact of this logging operation on recreational enjoyment of this precious resource can only be regarded as a total disregard for the public's right to enjoy the forest. Further, there is no plan for protecting hikers from the comings and goings of logging trucks and other heavy equipment.

2.No protection of mature forests. The management plan asserts that "no treatments in this project will take place within identified old growth stands". Of course, there are virtually no "old growth stands" of trees in New England, since in years past, the forest was completely logged. The President's Executive Order 14072 urges consideration not just of "old growth" forests, but of "mature forests" as well, conserving those areas and protecting them, so that they can be recruited to become old growth. The plan cites Executive Order 14072, but only as it relates to "old growth" and makes no mention of the very clear and explicit references in the plan to protecting "mature forests."

3.No meaningful consideration of carbon capture. In the Project Carbon Report, the authors give as a justification for not considering carbon capture in this planning that the effect of the project would be minor because the acreage involved is less than 0.1% of the White Mountain National Forest. This is a specious argument. The WMNF is indeed a large forest, spreading over a good portion of the state of New Hampshire. But the Sandwich Range is not large, and the proposed logging operation would make a significant dent in this, the southern portion of the WMNF. A portion of the Sandwich Range is in fact protected as wilderness and the areas adjacent to the wilderness should therefore be treated with special protective measures to enhance and ultimately expand the wilderness area.

4.No consideration of alternatives. The Forest Service is charged with considering alternatives to its plan. But it never undertook to consider any alternatives, at all. For this reason, alone, the Plan is fatally flawed.

5.There is no good reason to carry out this plan. There is no justification in terms of benefits to the forest or to the public from this plan. The forest of course includes trees such as beech that have experienced damage from insects and fungi, but there is no evidence that this plan will ameliorate these things. And, most importantly, there is no evidence that the forest will be stronger as a result of the planned logging. The forest is doing well, providing a lovely habitat for plant and animal life and a precious place near Eastern population centers where the public can access and enjoy nature.