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Organization:

Title:

Comments: Project: Sandwich Vegetation Management Project, Carroll County, New Hampshire

Responsible Official and Forest/Ranger District: Jim Innes, District Ranger, Saco Ranger District, White Mountain National Forest

I am writing to reiterate my strong objection to the proposed logging and prescribed burning of 600+ acres of mature forest in the White Mountain National Forest. The area in question is the southernmost ridge of the White Mountains which is clearly visible from Route 113A and includes some of New Hampshire's most iconic scenery, including stands of mature trees with a very popular network of hiking and skiing trails.

I believe the Environmental Assessment is flawed for the following reasons:

Why is the area around Ferncroft not included in Figure 5. Sandwich scenery analysis map? Areas of detail only include Guinea Hill and the Liberty Trail. Most of the logging is being proposed for the Ferncroft area with potential for considerable negative scenic impact, especially, from Route 113A driving north from Sandwich.

Page 37 of SVMP Environmental Assessment

Excerpt from Recreation and Quality of Life (Noise, Public Safety, Hazmat)

"The proposed action will not have significant impacts on the quality of life or recreation experiences of forest users in either the short or long term. Project design criteria (for example, REC-4 and REC-5 in appendix A) will minimize adverse impacts such as temporary disruption of recreational use due to decreased parking, trail relocations and noise during implementation. The impacts are temporary and will be short-term in nature. Due to the limited nature, extent, and duration of the project, the project will not contribute cumulatively to impacts to recreation in the analysis area and the limited extent of the impact indicates that it is not significant."

This seems to me to be a purely subjective viewpoint by persons who do not use these trails for recreation. The limited parking at Ferncroft and Liberty Trailheads, as well as the noise and commotion of logging and hauling are more than likely to deter hikers, skiers or snowmobile drivers from coming to the area, both short-term and longer-term if the trails are disrupted.

Page 39 of EA

Excerpt from Appendix A. Project Design Criteria and Other Measures of the SVMP Environmental Assessment (page 39):

"RE-8 Hiking trails in units 5, 6, 10, 11, 39, and 46 will be buffered a minimum of 66 feet."

I repeat my concern that the buffer zones along existing trails are woefully inadequate - and do not adhere to UNH Extension's recommendation that all forestry practices "maintain an uncut or partially cut buffer of 150 feet along recreational trails [hellip]. "

[<https://extension.unh.edu/goodforestry/>]. Ref: Page 63 of "Good Forestry in the Granite State (2010)".

As owner of a farm and 90 acres of farmland on Chinook Trail in Wonalancet at the base of the Sandwich Range, I am also concerned about soil erosion and water runoff. Why is the 7.6 mile long Wonalancet River not included on page 27 in the section on the Clean Water Act? This river flows right below the Ferncroft proposed logging area, past Chinook Trail Farm and eventually into the Swift River.

Page 4, para. 2 of SVMP Soil Report

Excerpt

"Short-term negative effects including soil displacement and soil compaction are anticipated from the proposed action. However, based on a review of the best science, and the context and intensity of effects, no detrimental impacts to soil productivity as measured by soil displacement (erosion) or soil compaction are anticipated from timber harvesting (Colter 2020)".

My question is: can we be sure of this? "Best science" should be described in detail.

I do want to reiterate that I support forest management in general but I believe that a more comprehensive Environmental Impact Study, with a full range of alternatives, is required for the project. There are too many 'assumptions' of environmental impact and I would strongly encourage the incorporation of a broader range of available science in the planning and analysis of this project.

The reactions of the local populations of Sandwich, Tamworth, Wonalancet and Albany have shown that this project is controversial and the majority believe it will have significant impacts on the environment and quality of the life of those who live and enjoy this scenic area.

The EA's section on the "Consequences of No Action" is not sufficiently explained and is not equivalent to a No Action Alternative.

Page 19

"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. Existing recreation opportunities would remain, and current recreation management and operation would continue in the project area. In addition, no transportation management activities would occur, and long-term travel management needs would not be addressed."

I would like clarification on what is meant by "transportation management activities" and "long-term travel management needs" which the above paragraph says would not occur or be addressed. This wording is incredibly vague! And I'd like to know what "resource concerns" would fail to be addressed if no action was taken?

The last point I would like to make (although it was not included in my first comments), is that the Northern Long-eared Bat, an endangered species, is most likely present in the proposed logging area. This species has been decimated by the disease known as white-nose syndrome so it is imperative that the Forest Service survey for potential impacts to this endangered species, as required by the National Environmental Policy Act.

The proposed logging of the Sandwich Wilderness would remove a great section of potential habitats of the Northern Long-eared Bat. The following is a quote from the U.S. Fish and Wildlife Service website:

"The species typically overwinters in caves or mines and spends the remainder of the year in forested habitats".
<https://www.fws.gov/species/northern-long-eared-bat-myotis-septentrionalis>

In summary, I stand with many others in our community, in asking the Forest Service to cancel this project entirely or at least come up with an updated plan to protect the trails, protect the Northern Long-eared Bat's habitat and minimize the disruptions which this project will cause to the residents of the area and to the thousands of people who currently enjoy the recreational opportunities of this area of the Sandwich Range.

Respectfully, submitted
Francoise Meissner

