Data Submitted (UTC 11): 4/1/2024 4:00:00 AM First name: Ben Last name: Semmes Organization: Title:

Comments: I am not opposed to the Forest Service increasing managing vegetation in these units, and appreciate the value of the proposed actions for fire prevention. I'm somewhat unconvinced that the beech scale disease poses a major ecological threat. It is certainly widespread, the trees may not be reaching their peak age and potential, but their appears to be plenty of mast produced and regeneration. Still, creating openings would bring benefits of biodiversity, and probably help mitigate the worst of beech scale. However, all these points considered, I do have cause for objection, in the continuation of previously raised concerns:

While I have found the USFS team to be willing to partially answer some of my questions in private, I am still disappointed that the consideration of comments that were shared failed to consider any of the concerns that I have raised repeatedly in the scoping period and second commenting period.

I object as a direct abutter and seventh generation landowner to steward a harvest adjacent woodlot, with a disproportionately large share of impacted watershed, shown in attached map. Several streams flow out of the proposed harvest units 36, 39, and 40, and converge in our family's woodlot. These tributaries are shown in blue flowlines from the National Wetlands Inventory (USFWS). Our lands are outlined in a purple polygon. As a close observer in these woods, I can attest that this terrain is a highly trafficked wildlife corridor. At dusk in the summer, particularly at the end of pupping season, we watch different varieties of bats swarm out of these woods to feed and drink, and then return to roost. That I can tell the harvest plan does not offer any restrictions on the purchaser of a sale from storing their equipment and toxic hydrocarbons right above our watershed. The almost certain parking of heavy machinery and fuel tanks in staging areas on the logging road above these tributaries is deeply concerning to our community. The Ranger team has made clear that the plan will likely reuse the former landing sites, so I have marked them on my map as pink circles. Careless use of gasoline, lubricants, diesel, and other toxic fluids by unchecked contractors stands to bring considerate environmental damage to one of NH's most pristine watersheds, bounded by wilderness areas.

In my most recent comment, I specifically asked questions about littering and shared photographs of gas cans left from previous harvests. When I followed up via email with the Ranger team it seemed that my original comment was never even read, as the head district ranger admitted to having never seen the photos. These cans are only two remnants of what was once likely even more hazardous waste left behind in this watershed by the purchaser of the last sale. What is the USFS doing to hold purchasers accountable now? Simply relying on a cultural change towards littering does not seem sufficient. Real environmental protection requires guardrails. Perhaps even more concerning than the lack of consideration to this comment is that these old gas cans have not been listed as Recognized Environmental Conditions (RECs) in the proposed harvest plan. A thorough Phase I Environmental Site Assessment should have identified these, and when notified of the location of these likely RECs, that Forest Service has not provided the Saco District Ranger team enough resources to plan accordingly is even more concerning. How does this plan comply with the National Environmental Protection Act if known possible RECs are being casually dismissed without investigation?

Lastly, when I enter the location of our woodlot, and the proposed harvest units, into USFWS' IPaC (Information for Planning and Consultation) tool, I'm reminded that the proposed harvest is covering protected Northern Long Eared Bat (Endangered) habitat. Does the USFWS issue a Technical Assistance Letter to the purchaser of the sale to offer any guidance on how they can avoid incidental take of this listed species? Are we really not concerned about this location? If so, can the Forest Service or Fish and Wildlife provide an explainer to the community on why this harvest doesn't warrant field surveys? Or did they take place? As a sideline observer, I would think that bringing heavy machinery into a wilderness adjacent harvest unit, that hasn't been disturbed in over thirty years, would create a risk of pollution to a key water resource. More significantly, I think that the

operation of that heavy machinery after May 1st, when pupping season starts, and through the summer could create environmental impact that would benefit from further study or explanation to the public. Loud noises can easily trigger mothers to abandon their pups before they have developed the ability to feed themselves, causing "take". I understand that this particular species' population has been quite decimated, hence the uplisting. Still, undisturbed land with plenty of large snags, cool rock features and nearby caves, adjacent to wilderness seems worth the funding for further environmental assessment, or a desktop report to support technical assistance of any purchasers operating in this area. I understand that all of these agencies must triage with limited funds and resources, but am shocked that this harvest area didn't warrant on the ground environmental assessment / field studies.

Lastly, I still object that this project will not have an environmental effect of visual impact. As stated clearly in earlier letters, even harvesting 10% of the highlighted acres would have a visual effect, and the plan permits 20%. I can appreciate that the Ranger team must follow the Forest Plan definition that if less than 4 acres of an opening are visible than there is no environmental effect, but as someone who will be looking at the impact, I respectfully disagree with the backwards use of that word. The cumulative effect of clearing 10-20% of >350 acres is undeniably visible in the standard use of the word.

I have attached two visual renderings that were completed last year. The most useful shows hypothetical group selections in the proposed Wonalancet/Ferncroft units, overlaid on 1996 aerial imagery. The visual impact of this scale of harvest will have have an impact on this viewshed for decades. While it will fade overtime, it is not invisible. The second shows the direct view of the units from the viewpoint aside Mount Wonalancet.

For the record, the Consideration of Comments continues to fail to recognize several popular, publicly accessible, highly trafficked, and known viewpoints. Even if by the rules of the Forest Plan the prescribed treatment would be found to have a negligible environmental impact, I would like the record to show, that Mt. Whiteface, Mt. Wonalancet, Mt. Hibbard were never recognized in the proposed plan, despite meeting all of the objective criteria of the Project Scenery Resources Effects Analysis.

I have attached my former comments, so that they can be reconsidered in the context of this objection. 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.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. 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.