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Comments: Please Review my Comments Regarding the Sandwich Vegetation Project as follows:

### Reasonable Alternatives

Please consider amending or rewriting the hopelessly out dated Forest Plan bringing front and center the obligation of the Forest Service to promote and safeguard mature trees and reduce the emphasis on a sustainable yield of high-quality timber products. Most, so called, timber products come from private land.

Under the National Environmental Policy Act (NEPA), federal agencies are required to evaluate the potential environmental impacts of a major federal action. NEPA also requires that federal agencies consider a "reasonable range" of alternatives. What is a reasonable range? The White Mountain National Forest, (after the Comment Period), should not present the Sandwich Vegetation Management Project as an all or nothing proposition: ie [hellip]... either log 630 acres (within 1,400 acres) of publicly-owned land in one of the most scenic areas in New Hampshire's White Mountains AND burn and cut trees (96 acres) for wildfire control AND reconstruct 4.5 miles of forest road; OR we can do nothing at all.

### 30% By 2030 / Carbon Sequestration

The climate emergency and sixth great extinction have not lessened the commitment of those driving forest management to "get out the cut" at the expense of the future. The US Forest Service uses euphemisms like "forest restoration," "habitat improvement," and "even-age management" to excuse outdated commercial logging practices like clearcutting that degrade forest health, jeopardize water quality, and endanger biodiversity. Maturing and centuries-old trees are still growing across the country, but on federal forest lands many of them are vulnerable to logging. Once these maturing trees are cut down, the opportunity to develop old-growth forests will be irreversibly set back at a time when scientists are making it clear that we have only a short period of time to stabilize the climate. Our older forests are still being logged at an alarming rate -- this directly undermines the Biden administration's efforts to address climate change and protect 30% of lands and waters by 2030. Old-growth and mature trees form the backbone of their ecosystems, absorbing the greatest amount of carbon dioxide, maintaining genetic diversity and providing habitat for all sorts of life, including our own.

### Forest Plan Out of Date

Every national forest the Forest Service manages is required to have a land management plan (forest plan) that is consistent with the National Forest Management Act of 1976 (16 U.S.C. 1604) and other laws. The National Forest Management Act directs that these plans be amended as necessary and revised within 15 years.

The White Mountain National Forest last revised its management plan in 2005. The ensuing 17 years have produced vast changes in science and public opinion. Scientists now inform us that we have a little less than 8 years to radically change our ways to avoid irreversible negative effects of Global Warming and the consequent Climate Emergency. Those same scientists believe that we can avoid the worst effects by drastically reducing our use of fossil fuels and, at the same time, stopping logging and allowing forests to mature on our public lands.

Project documents state that site assessments and other data indicate that existing conditions in the Sandwich HMU do not meet MA 2.1 habitat composition and age class objectives described in the Forest Plan (pp. 1-20 to

1-21). The last 17 years have changed completely what an up-to-date Forest Plan would have as objectives for MA 2.1. 17 years ago the terms "Climate Change" and "Carbon Sequestration" were used by a hand full of scientists and concerned citizens. Today, the entire world is using those terms every day and is suffering from our unwillingness to use the tools available to us to mitigate the most severe outcome.

## Wildlife Impacts

The extinction crisis is coming home to roost. In March of this year the Northern Long-eared Bat was proposed for listing as an Endangered Species with the full protection of the Endangered Species Act. However, the Sandwich Vegetation Project proposal makes no mention of the heightened risk for this imperiled mammal. Northern Long-eared Bats are uniquely dependent on mature and old forests for their survival. The bat's habitat requirements are the polar opposite of the type of habitat that will be generated from logging proposed by this Project. According to the US Fish and Wildlife Service Species Status Assessment Report for the Northern long-eared Bat, dated 3/22/22, the bat depends on mature and old forests for roosting and foraging. Preferred roosting habitat is large diameter live or dead trees of a variety of species, with exfoliating bark, cavities, or crevices. Bats change roosts approximately every two days. Preferred foraging habitat is old forest with complex vertical structure on hillsides and ridges.<sup>1</sup>

To quote the Forest Service Biological Evaluation for the Tarleton Vegetative Management Project (pg 8), "The temporal scope for indirect effects is on the order of several decades to centuries because that is how long it can take for forested stands to provide similar habitat structure post-harvest compared to pre-harvest." This same Biological Evaluation shows the Federally Threatened Northern Long-eared Bat is present in the area to be logged and will be disturbed as follows: "Indirect effects include those that affect bats through alteration of habitat, such as the removal of roost trees when bats are not present. While there would still be ample roost trees available within the HMU and the surrounding area after the proposed timber harvests have been conducted, bats may be impacted if existing maternity roost trees are removed. Site fidelity is common in [Northern Long-eared Bats] habitat and females often return to the same maternity area over multiple years (USDA Forest Service 2014). "There is a risk of impacting maternity colonies with the degree of tree removal proposed."

What's more, there is no mention of the lethal effects on pollinators when herbicides are used to kill invasive species. Logging invites the introduction and spread of invasive species.

## President Biden issued an Executive Order to Protect Mature, Old-Growth Forests on Federal Lands

President Joe Biden has issued an executive order today that directs federal agencies to conduct an inventory of mature and old-growth forests on America's federal lands so that policies can be adopted to protect them. The administration framed the move as a key strategy to store carbon and address climate change.

The WMNF MUST conduct that inventory PRIOR to any logging project to comply with this order. Otherwise the order is useless.

Conservation groups welcomed the president's commitment to forest protection and praised Council on Environmental Quality Chair Brenda Mallory's dedication to full-scale environmental protection. The spotlight is now on the United States Department of Agriculture and the Department of the Interior to quickly develop a policy protecting mature forests and big trees from threats, such as logging, that can stand as a global model for forest protection.

"We welcome the president's Earth Day announcement," said Ellen Montgomery from Environment America. "We have no time to lose when it comes to protecting our forests both in the United States and across the globe. Our global forests help mitigate climate change by absorbing carbon dioxide from the atmosphere and storing it for decades or even centuries. And forests provide habitat for our wildlife and are a critical source of drinking water

for our communities. This announcement is a critical step forward not only for the United States but for our role as an international leader in the fight against climate change."

Reinforcing the administration, 135 climate and natural resource experts sent a letter to the president that affirmed the importance of mature forests and big trees. Older trees accumulate and store tremendous amounts of carbon over many centuries, providing vital wildlife habitat, clean water, clean air, and mitigation for floods and droughts. Protecting them is a key tool in the fight against climate change.

"We applaud President Biden's commitment to protecting and restoring mature and old-growth forests and recognizing the value of forests as a climate solution. We urge this administration to move forward promptly with a simple rule to safeguard federal forests nationwide from logging and other threats as a central pillar of our national climate strategy," said Earthjustice President Abigail Dillen. "The United States can and should be an international leader in implementing forest protections as a remedy against the dual crises of climate change and biodiversity loss, and this is a major step toward safeguarding our federal forests here at home."

Reflecting widely held scientific agreement on the urgent need to protect mature and old-growth forests as a climate solution, the executive order directs the USDA and Interior to complete an inventory of old-growth and mature stands on forest lands managed by the U.S. Forest Service and the Bureau of Land Management within one year. This process should quickly inform a rule-making process to confer durable protection for mature and old-growth across all federal lands.

"Protecting mature forests is meaningful climate action," said Garrett Rose, staff attorney with NRDC (the Natural Resources Defense Council). "The president's welcome move recognizes the importance of older forests and big trees and the need for their robust protection on our federal lands. The day has long since passed when Americans relied on federal forests for their timber. And rural communities have largely made the transition to processing small-diameter trees. This is a golden opportunity for USDA and Interior to set a durable policy and a strong example for global conservation of the trees that are so critical to fighting climate change."

The Climate Forests Campaign has been urging the Biden administration to enact a strong, lasting rule across federal public lands that protects mature and old-growth trees and forests from logging, allowing the recovery of old-growth forests that have been lost.

"This smart move by President Biden signals to the world that he's serious about protecting forests here at home and abroad," said Randi Spivak at the Center for Biological Diversity. "There's no carbon-capture technology better than older forests and trees. For the sake of our climate and nature, it's time to stop logging these carbon-storing champions on federal forests now. We don't have a moment to lose to secure permanent protection for mature and old growth forests and trees."

This announcement comes 13 months after President Biden signed an executive order, Tackling the Climate Crisis at Home and Abroad, which set out a path to achieve net-zero emissions, economy-wide, by 2050 and to work with partners internationally to put the world on a sustainable climate pathway.

"Our federal forest lands sequester 35 million metric tons of carbon, making them a natural solution in the toolbox to tackle the climate crisis," said Kirin Kennedy from Sierra Club. "Conserving and protecting our remaining old and mature growth trees and forests has been the missing link of U.S. climate policy for decades. We are encouraged by President Biden's leadership today in the hopes forests can be part of the climate solution."

As people search for the best human-created carbon sequestration technology, they often overlook what already exists in nature. By simply managing oceans and forests responsibly, the world could effectively reach up to 37% of the emission reductions needed to avoid worst-case climate predictions by 2030.

"Mature and old forests are workhorses, providing essential habitat, clean water and resilience to droughts and floods," said Zack Porter, executive director of Standing Trees, which advocates for recovering New England's native old-growth forests. "And yet, only 3% of New England forests are allowed to grow old. We can do justice for the climate, biodiversity, and our communities by recovering old-growth forests on federal public lands."

The Center for Biological Diversity, Earthjustice, Environment America, Natural Resources Defense Council, Oregon Wild, Sierra Club and Standing Trees plan to engage with the administration in the months ahead to develop a strong, lasting rule applicable to federal forestlands.

"Protecting America's old-growth forests, and letting new giants grow, is one of the biggest single steps we can take to combat climate change," said Steve Pedery with Oregon Wild. "We thank President Biden for taking this important first step, and we look forward to working with the White House to enact strong, permanent protections for mature and old-growth forests on America's public lands."

#### Finding of No Significant Impact (FONSI)

The White Mountain National Forest invariably issues a FONSI for their proposed projects. The reason for this is quite simple....it avoids the necessity of preparing an Environmental Impact Statement (EIS).

Preparing an EIS is time consuming and opens the project up to greater potential for negative analysis.

A FONSI is not appropriate for this project. The definition for "significantly" from the Council on Environmental Quality regulations, citing the intensity factors at 40 CFR 5108.27: of the 10 listed definitions numbers #4 and #8 and #9 seem to apply:

\* #4 states "The degree to which the effects on the human environment are likely to be highly controversial". A majority of scientists throughout the world believe that logging contributes to Global Warming and must be stopped and this indicates that it is "highly controversial"

\* #8 states "The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, or may cause loss or destruction of significant scientific, cultural, or historical resources". The likely damage to stone walls, and foundations, will cause the loss or destruction of significant cultural and historical resources.

\* #9 states "The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973." As stated in the section on wildlife above, the Northern Long-eared Bat was proposed for listing as an Endangered Species on March 23, 2022 by the US Fish and Wildlife Service. Given this likely upgrade in protections, the Sandwich Vegetation Project surely warrants the level of analysis that would come with an Environmental Impact Statement.

1 U.S. Fish and Wildlife Service. 2022. Species Status Assessment Report for the Northern long-eared bat (*Myotis septentrionalis*), Version 1.1. March 22, 2022. Bloomington, MN.

#### Management of Beech Trees

The Project documents describe the proposed actions vis-a-vis Beech trees as follows: "Encouraging the establishment of shade-intolerant species in the understory. Other objectives include retaining existing disease-free mast producing trees for wildlife, discouraging beech regeneration, and removing beech saplings during treatment to reduce their dominance in the new stand."

No mention is made of preserving the seedlings and saplings generated by the disease-free mature and maturing Beech trees. Beech nuts are a major source of protein for black Bears and Deer as well as for many smaller mammals and birds.

The Project documents quote out-dated information on this subject ie...To allow other northern hardwood species a chance to become established and develop within harvested stands, and consistent with forest plan desired future conditions and objectives for this HMU, undesirable species should be controlled by cutting these stems when the stand is harvested (Hannah 1991). (31 years ago)

#### Prescribed Fire

Project documents propose that prescribed fire would also occur across approximately 96 acres in select units

A wildfire in northern New Mexico that destroyed at least 330 homes and displaced thousands of people was caused by a planned burn by the U.S. Forest Service, federal fire investigators said on Friday.

The Calf Canyon fire escaped containment lines and merged with the Hermits Peak fire, which was also caused by an out-of-control planned burn, to form the largest wildfire in New Mexico's history.

The combined Calf Canyon/Hermits Peak fire has burned more than 312,000 acres, threatening remote mountain villages and forcing thousands to evacuate, sometimes repeatedly, over the past two months.

The Forest Service's chief, Randy Moore, said last week that the agency would pause its use of prescribed fires on the agency's lands.

The lawsuit was filed Wednesday in U.S. District Court in Albuquerque on behalf of 50 Mora County residents, the Santa Fe New Mexican reported.

It asks the court to declare that the Forest Service improperly withheld planning documents for the burns, agreements or contracts with anyone who helped carry out the burns and information on the rules and regulations that govern the prescribed burns.

Burned patches cover the forested mountains for miles around. The fire destroyed homes, burned parts of the forest used for logging, and he's clear who he blames.

Some Quotes from affected people[hellip][hellip][hellip][hellip]...

GRIEGO: The people in this area are disgusted with the U.S. Forest Service.

FORDHAM: The fire, still only two-thirds contained here, began as two planned burns by the Forest Service, which got out of control. Those are designed to burn parts of forests so there's less fuel and bigger fires don't break out. But residents and state politicians say during a windy, dry spring, a planned burn was a bad idea and that the federal government should pay for the considerable damage. Foremost among those voices is Governor Michelle Lujan Grisham, whom I run into out and about in Mora.

#### Roads

Why would the White Mountain National Forest propose the following:[hellip][hellip].. of the approximately 16 miles of existing unauthorized roads in the project area, 12 miles would be converted to maintenance level 1 forest system roads. Since these roads are unauthorized, why should they be authorized? Isn't this a case of adding roads to the National Forest Inventory when literally thousands of miles of Forest Service roads are not

and never will be maintained but be left to produce harmful ecological conditions. Under the 2001 Roads Rule they should be decommissioned.

Under the 2001 Roads Rule

"The emphasis of this policy is on managing the existing road system. The intended outcome would be that fewer new roads will be built; unnecessary classified and unclassified roads would be decommissioned

This policy will help ensure: 1) the rehabilitation of ecological processes disturbed by past road construction; 2) efficient reconstruction and maintenance of Forest Service roads; 3) the construction of new roads is limited to those necessary for National Forest System resource management; and 4) that future construction, restoration, and maintenance of roads will have a minimal long-term adverse environmental impact.

Improperly constructed roads and poor road maintenance can increase the risk of erosion, landslides, and slope failure--endangering the health of watersheds that provide drinking water to millions of Americans and critical habitat for fish and wildlife. Although today's standards are more environmentally sensitive, much of the Forest Service's road system was constructed using less environmentally-sensitive standards. Growing scientific information demonstrates that road construction and other activities in sensitive areas can allow for the entry of invasive plants and animals that threaten the health of native species, increase human-caused fire, disrupt habitat connectivity, and compromise other social and ecological values.

In 2021 the Forest Service had a growing \$3 billion maintenance and reconstruction backlog and receives only 20 percent of the annual maintenance funding it needs to maintain its existing 370,000+ mile road system to environmental and safety standards. "