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Comments: No Reasonable Alternatives Offered

The National Environmental Policy Act (NEPA) requires that federal agencies consider a "reasonable range" of alternatives. The White Mountain National Forest presents the Sandwich Vegetation Management Project as an all or nothing proposition: We can either log 650 acres; OR we can do nothing at all. This approach is neither reasonable nor legal. At the very least, the White Mountain National Forest should provide a detailed No Action Alternative that investigates the benefits of leaving the forest as it is.

#### Scenic Values on the Chopping Block

People have traveled to the villages at the foot of the southern Sandwich Range for over 125 years to enjoy its spectacular setting and access to the outdoors. Local communities as well as visitors from distant cities come to the Sandwich Range for the opportunity to reconnect with wild nature. Hundreds of acres of proposed logging will occur along major trail corridors accessing the Sandwich Range Wilderness and Mt Chocorua Scenic Area, and will be visible from the village of Wonalancet, from high points such as Mt Chocorua and Mt Israel, and from summits and rocky outcrops inside of the Sandwich Range Wilderness.

#### Forest Carbon and Climate Change

After near-total forest clearing during the 1800s, the forests at the foot of the Sandwich Range have regrown and matured, and many have been unlogged since agricultural abandonment. These healthy, mature forests store vast amounts of carbon, and they will recover the characteristics of an old-growth forest if allowed to grow older. Recent studies show that unlogged forests in the Northeast will continue to accumulate and store far more carbon than is contained in logged forests or in wood products. Logging and burning these carbon-dense forests would immediately release significant amounts of carbon into the atmosphere, worsening the climate crisis. President Biden issued an Executive Order in 2022 directing the Forest Service to conserve mature forests just like those targeted for logging in the Sandwich Vegetation Management Project. Instead of racing headlong to cut these climate-critical forests, the Forest Service should allow them to grow old.

#### Endangered Species and Water Quality

The US Forest Service uses euphemisms like "forest restoration," "habitat improvement," and "even-age management" to excuse outdated commercial logging practices that degrade forest health, jeopardize water quality, and endanger biodiversity. Logging, road construction, skid trails, and the likely use of herbicides all serve to degrade and fragment habitat for rare and imperiled species that prefer old and interior forests, and risk harming downstream communities. The Northern Long-eared Bat is a federally-endangered species that prefers older forests and is assumed to be within the project area. Yet the White Mountain National Forest does not intend to survey for the bats before logging, and is planning to log forests when bats would be most vulnerable (i.e. when they are not hibernating in caves during the winter). In addition to their impacts on habitat, logging threatens to introduce invasive species, worsen local water quality, and heighten the risk of flooding.

#### Forest Plan Out of Date

The White Mountain National Forest last revised its management plan in 2005, and climate change was given scant attention at the time. The scientific consensus on the threat of climate change and its impacts has increased exponentially in the years since. Forest Plans are required by law to be revised after 15 years. How

can the public trust a Forest Plan that was developed without regard to climate change?