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Comments: Sandwich Vegetation Management Project #57392

I have carefully reviewed the Draft Environmental Assessment for the above project; it raises far more questions than it answers. This project is large in scope, covering three key areas in the Whiteface/Wonalancet area of the Towns of Sandwich, Tamworth, and Albany. The purported benefits to the health of forest are minimal, and the Project will be disruptive to the forest, to wildlife habitat, to residents, and to those who use the area for outdoor recreation over a period of several years. Any economic impacts will be negative once all local impacts more than zero out any projected revenue.

Other commenters have addressed the issues of the Executive Order to maintain mature forests as a climate change mitigation strategy, as well as the circular logic and justification of actions based on an outdated 2005 Forest Plan that is now more than three years past its legal expiration date. I will focus these comments on two concerns that are given short shrift in the Draft Environmental Assessment: air quality effects of the prescribed burn plans and water quality impacts of both the prescribed burns and the clear cuts.

While prescribed burns may be a useful strategy in certain forests, the case for using this strategy in this region is not made in the Plan. The risks associated with prescribed burns include wildfire, risks to wildlife, decrements to air quality, and risks to water quality. Our community has already had numerous days poor air quality and exposure to wildfire smoke from Canada for the last several months, which has been documented by local sensors on [fire.airnow.gov](https://www.airnow.gov) and on some days has been as much as 75 to well over 100 times the normal rate of particulate matter. The short and long-term risks of exposure to wildfire smoke have been well documented, with risks to children, older adults, the chronically ill, and even healthy adults. The cumulative effects of smoke over the last few months on our residents' health will be exacerbated by the unnecessary and destructive prescribed burns outlined in the proposed Plan. The Draft Environmental Assessment ignores these potential serious impacts.

The proposed Plan also will affect water quality, both in the immediate area and downstream to our rivers, ponds and lakes. It has long been said here that "an inch of rain on top of Whiteface equals four inches in Bearcamp Pond." Given the new "normal" of extremely heavy rains and downpours, it's possible that that equation has changed significantly. Removal of vegetation by clear cuts and prescribed burns (not to mention the addition of miles of logging roads and equipment trails) will exacerbate erosion and run off and negatively impact our brooks, aquatic life, ponds, and lakes, and potentially exacerbate flash flood and areal flood risks. Again, the Draft Environmental Assessment ignores these potential serious impacts.

Again, the negative impacts of this Plan are many. The Draft Environmental Impact report oversells the benefits of the project and dangerously underestimates the risks.

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