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Comments: I am a resident of North Sandwich, and I do not support this plan moving forward in any capacity until the Forest Plan from 2005 has been revised as per the NFMA requirements that all plans are revisited at least every 15 years [16 USC 1604 (f)(5)].

I have further objections to this proposed plan on several other bases:

1. There is no demonstration of the need for these actions, and the consequences of inaction are inconsequential or speculative and fail to highlight benefits of inaction.
2. Mature class stands are apparently undervalued in favor of regeneration class stands and arguments to justify this are poorly founded.
3. The plan does not appropriately value endangered or threatened species, nor does it properly evaluate the effects this action may cause regarding invasive species introduction to the affected areas.
4. The plan does not adequately consider the effects of climate change and does not sufficiently consider fire management in this proposal.

The proposal does not demonstrate adequate need for the planned actions. The proposal should clearly explain which goals each action aims to further rather than simply stating that they "advance forest plan goals and objectives". There is insufficient evidence provided that the forest needs improvement, nor any explanation as to what conditions the forest needs to be improved from.

The assessment states that "The proposed action will not have significant impacts on the White Mountain National Forest's forest resources as effects are well documented and consistent with past forestry practice". I disagree with the basis of the claim that, simply because proposed actions are consistent with past actions, they will not have significant impacts. Past forestry practices have included wasteful destruction and permanent degradation of the land. While I do acknowledge that modern forestry practices have improved, I do not concede that they are as good as they should be, nor that their shortcomings should be considered acceptable simply because there is precedent for them.

There is also insufficient explanation or justification for why the advance regeneration class of American beech must be removed. There is passing reference to beech bark disease, but insufficient explanation of its effects, the current extent of impact on the trees suggested for removal, nor any discussion as to alternative methods for managing this disease. The stated goal of full tree removal of these trees is to promote understory development of other hardwood species, suggesting that the true goal this action is economic, not ecologic, serving to increase future timber value of these stands rather than to address beech bark disease infestation.

Outright removal of these beech trees is short sighted, especially if there is no system in place to identify trees with potential resistance. Removal of these trees ensures that any individuals with resistance never have an opportunity to reproduce. Many of these trees may succumb to the disease and will need to be removed at a future date, but I do not support removal en masse at this point. Despite higher costs, individual selection of clearly diseased and non-resistant trees would further the goals of understory hardwood development and diversity while providing an opportunity for resistant individuals to succeed. Preservation of these trees is especially important as they are one of the few remaining mast producing trees in our forests and therefore an important food source for many animals.

Regarding management plans targeted at removing overrepresented species on ecological land type, I disagree with the necessity of this operation. Clearing hardwood on an ELT designated for softwoods to promote succession to spruce/fir feels like a convenient excuse to harvest these trees. Natural succession will occur regardless of intervention, and there is no apparent negative effect of letting this process occur without human intervention. Arguments that this selection to promote desired succession types is helping the forest recover from extreme logging historically are irrelevant. Again, natural succession will proceed without our intervention, so the harvesting of these trees without other rationale appears purely profit driven.

The "Consequences of No Action" section is insufficient. "Diversity of age and structure in the habitat management unit would remain relatively limited, and a wildlife habitat objective of the forest plan would not be met as wildlife habitat diversity would continue to decline. Overall, stand vigor in the proposed treatment units may decline over time due to increasing competition for sunlight, moisture, and nutrients among trees." There are no negative consequences to inaction; the stand vigor "may" decline due to competition, but this is a natural process I do not see non-economic reason for interrupting. Additionally, there is no analysis on the benefits of no action, only a focus on the presumed drawbacks of inaction. I find this omission to be especially glaring, as the benefits of intact mature class forests are becoming more understood and more important as our climate destabilizes.

This management plan is clearly targeted towards maintaining a landscape benefiting timber production, not preservation of natural landscapes or increasing forest diversity (though diversity is used as a convenient excuse for many of these actions). Indeed, the foremost stated goal in the outdated Forest Plan is "to provide a variety of high-quality timber products". I understand the need for sustainable harvest of timber, but there is no demonstrated need for logging the White Mountain National Forest. Is there any evidence that timber needs cannot be met by New Hampshire's private timber owners?

The proposed actions in this plan outright disregard Executive Order 14072, which has the stated purpose of conserving mature and old-growth forest. I do not agree with or understand the apparent devaluation of mature class forests in favor of regeneration class even aged forests. Increased forest diversity created by regeneration class forest is used as justification multiple times, but the assessment fails to outline which species benefit, fails to make the case that those species currently lack suitable habitat or their habitat is in decline, and fails to demonstrate that existing diversity in the forest is low or needs to be increased. The assessment does not seem to account for privately owned lands outside of the Sandwich HMU. There is no shortage of regeneration class forests nearby - in fact, it seems to be the intact mature class forests that are dwindling. This assessment also does not seem to consider the species dependent on unfragmented mature class forests, instead focusing primarily on the benefits and diversity added by creating regeneration class forests, which conveniently aligns with timber industry interests. Fragmentation is already a large cause for concern on private land and it is a shame to extend it into the national Forest. Large blocks of intact forest minimize harmful vectors for the spread of invasive species, impacts of which are not adequately evaluated in the assessment.

Regeneration class forests occur naturally due to disease or disaster without intervention, so these ecotypes will continue to occur naturally on their own schedule. Indeed, with more extreme climate and disease, blowdowns and stand die offs will occur more frequently than ever - we should preserve what we have while we have it. It is easy to create a regeneration class forest, but there is nothing we can do to increase mature class forest once they are gone, so we should prioritize maintaining the resource that cannot be easily converted.

The reclassification of the Northern Long-Eared Bat should absolutely result in changes to the proposed actions. Disturbance and fragmentation of habitat for this species is unacceptable. Though there is a reduced chance of taking a bat during logging activities (because bat population has been decimated), each incidental take of a bat is a proportionally larger loss to the remaining population for the same reason.

This assessment includes insufficient detail of the effects to fire potential proposed actions will have. As we have seen this summer, wildfires are becoming increasingly common and increasingly intense. Any management plan that does not include in-depth evaluation of the effects on fire potential cannot be considered complete.

This assessment is seemingly unaware of modern research that shows the benefits of mature class forests over regeneration or young class forests. Mature forests are more resilient to climate change (<https://onlinelibrary.wiley.com/doi/pdf/10.1111/gcb.14656>), the pose less of a risk for fire potential (<https://iopscience.iop.org/article/10.1088/1748-9326/ac5c10>), and it is the largest 1% of mature trees that comprise the half the aboveground biomass in a forest (<https://onlinelibrary.wiley.com/doi/abs/10.1111/geb.12747>). Clear cutting, patch cuts, and large group selection increase surface temperatures, wind speed, and therefore drying effects which increase risk of fire. Additionally, these drying effects extend into adjacent undisturbed areas, potentially altering the microclimate in designated wilderness areas near the proposed action areas.

I acknowledge that the Forest Service is responsible for ensuring a sustainable yield of forest services, including timber, and that a complete cease of all logging is not a reasonable expectation under the current directives. However, I consistently find that timber interests are prioritized above all others. Logging activities have the largest adverse impact on all other resources and activities these forests provide, while contributing no more economically than forest recreation activities (which are far less destructive). Overall I am very disappointed with this assessment and cannot support it until my concerns have been adequately addressed. Until the Forest Plan is revised, climate change effects (including fire potential) are more thoroughly evaluated, and a justification of need for each action is presented, I will oppose this plan.