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Comments: I would like to add my comments to the Sandwich Vegetation Management Project #57392.as a late commentor, I have had the benefit of reading all the other comments to date and add my comments in the context of other's comments already on record.

I was married in the Wonalancet Chapel 45 years ago and have recently inherited the family land that my wife and I have called our summer home for that whole time. We love the place and valley and we know it well. I think that the plan needs to be commented on in specific and I will limit my comments to the area described in Map 2, Ferncroft. Although we are familiar with the other sites, we are not familiar enough with them to offer specific comments.

The plan shown in Map 2 is very coarse grained and lacks topography, detailed hydrology, setbacks from adjacent parcels, paths and waterways. When those elements are added back, the net acreage will be much less. If the plan is to be approved or denied, then the specifics of what is in the document must be looked at against what is actually there. This reduction in the area to be harvested reduces the area of a planned harvest, but does not reduce the impacts associated with it.

The trailhead off Ferncroft Road has always been busy, but in the last couple of years, due to COVID, it has been overflowing with hikers. Most weekends, the lot is full and parking overflows to RT 113A. One recent weekend we counted over 200 cars. There are a lot of new hikers in the valley and this trail head allows for them to access many of the trails in the valley. The added traffic of loggers, seems to be a conflict that is not adequately addressed in the plan.

*Rt 113A and 113 have been repaved this year and the bridge between Wonalancet and Tamworth just been reopened after a renovation. Logging trucks will age this new infrastructure prematurely. The cost of that wear and tear on the local roads is not accounted for in the project.

*If the trailhead access is there already, that favors a redevelopment of the existing logging roads from a physical cost basis, but are the conflicts too great?

*I understand that the grouse is an indicator species and it's decline is indicative of a rapid loss in open habitats and pioneer species. Those habitats are in decline and being pushed out, not by development, but by maturing woodlands. The pioneer tree and other species in these ecosystems are vital for recovery of areas from future devastation due to fire, hurricane or other cataclysmic events. They need to be in a balanced ecosystem, but do they need to be here?

*One of the advantages of opening up the woods is to increase game bird habitat. While that is a laudable and desirable goal, is there not a better site in a more remote area that would not build in decades of conflict between hunters and hikers? The State mandates a separation between hunters and trafficked ways, but many of these new hikers are not seasoned outdoors people and do not understand the role of hunting in conservation. There are bound to be conflicts, and there must be better and safer sites that can open up maturing woods for clearcutting.

*There has recently been clearing on private land between Wonalancet and Sandwich and also between Wonalancet and Tamworth. These openings change the balance of mature woods and new woods in the area and decrease the need to provide a similar area here.

*In the last couple of years there have been clear cuts on private land near Mount Catherine. The runoff from those sites has resulted in trail erosion downhill from the clearings that made the trails barely accessible through most of this summer. We don't want to have the same happen to the trails around Ferncroft.

*There was a clearcut on the south slope of Mount Wonalancet in the late 1970s that was very controversial at the time due to its visual impact and proximity to the Bowl Natural Research Area. Many of us remember that clearcut and the visual impact it had at the time. It is still very noticeable. This proposed clear cut would be much more prominent and take much longer to heal. The old clearcut area is still a much different landscape than the surrounding forest and it is slowly returning to the woods it once was. Doesn't this previous clearcut serve the purpose of habitat diversification without starting a new one? Won't opening up even more acreage to new

growth potentially impact the nearby Bowl with the inevitable windblown invasives that colonize such disturbed sites.

*Most of us in the valley get our drinking water from shallow wells and our watershed feeds into the Swift River, a productive trout fishing stream. The use of any herbicides and the inevitable erosion that comes with logging of this kind would impact both. We do not have any viable alternatives for drinking water., but maybe there are other alternate sites for a clearcut?

In addition, I would like to offer the following comments on the conclusion of the Draft Environmental Assessment finding of no significant Impact

*Context: While it is true that the context of a 1,300 acre disturbance within an 800,000 acre forest is small, the Ferncroft site is on the edge of the forest uphill and upstream from non-Forest land. If the site were surrounded by acres of national Forest, the Context analysis would be correct, but the true context is within the Valley downstream from the project, where the project is a significant portion of the watershed of Wonalancet.

*Non-Invasive species: We have poison ivy, bittersweet, honeysuckle and other invasives in the valley that have spread in recent years. There is a ready seed source that the logging trucks and wildlife will bring into the area. With the Bowl so close, it is worth the gamble of opening up so much disturbed area so close to seed sources?

*Recreation and Quality of Life: Seen only in the context of the Forest as a whole this may be true, but the impacts to the area roads, the conflicts for the large numbers of hikers, dust from logging trucks on Ferncroft Road for up to 10 years is not insignificant.

*Transportation and Access: This could have been minimal if implemented before the repaving and bridge work, but now it will be significant.

*Forest and Silviculture: This is true of National Forest land, but significant portions abut downhill private land owners, who will be impacted.

*Effects on Public Health and Safety: The use of herbicides within in the areas upstream from several private wells may be safe, but that is not guaranteed of safeguarded in this program. There are individuals living in close proximity to the site that have been affected by prior exposure to pesticides and herbicides and we have lost people before their time to similar exposures. We are very sensitive to the issue.

*Specific comments on Map 2 - Ferncroft on page 9

General - In the descriptions of Levels of Vegetation treatments, Group thinning is described as typically used for 0.1 to 2.0 acres. The area of Group thinning is many times that amount.

Parcel 35

*Thinning is indicated up to the edge of Old Mast Road path. Why is it necessary to include clearing up to the edge of this path while staying away from the nearby Kelley Trail?

*This area abuts private property. Shouldn't there be a setback?

Parcel 36

*Why is the clearing so close to the Kelley Trail path stream? It appears to be less than 50' from the stream.

*Why does the clearing extend downhill from Spur A into the stream. Should it not be set back from the stream entirely?

Parcel 39

*The Cabin Trail will be impacted on both sides for over a mile. Couldn't the clearing be pulled back from the trail? The same is true for the Big Rock Cave Trail.

Parcel 40

*This area abuts private property. Shouldn't there be a setback?

Parcel 46

*This area abuts private property. Shouldn't there be a setback?

*Why doesn't this parcel have a deeper section uphill from the pond to protect its water quality?

As they say, the devil is in the details and without addressing these details, the plan lacks specific benefits that would outweigh the costs other than a short-term economic benefit from timber sales alone. It also doesn't answer the fundamental question of "Why here?" and "Why now?"

Respectfully submitted

Thomas R Ryan FASLA