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Comments: Thank you for the opportunity to comment on the Draft EA for the Sandwich Vegetation Management Project.

I recognize that the Forest Service balances many uses on the WMNF, and does an excellent job overall, and that timber harvesting is one of the important uses. I support timber harvesting on the Forest in appropriate locations, though I would prefer a stronger emphasis on single tree/selective cutting rather than clearcutting and "group selection" patch cuts.

However, recreation and scenery viewing are equally, if not more important uses on the Forest, especially in the project area being considered here, with its popular hiking trails. The way this project is currently designed - with two of the three project locations heavily impacting both hiking trails and trailhead parking areas - there will be unacceptable negative impacts on both recreation (hiking trails) and scenery in the project area. I cannot support this project unless there are substantial modifications made to minimize the impacts on the hiking trails. I strongly urge the Forest Service to significantly redesign this project to minimize these impacts and to provide a better balance among these uses.

The negative impact of this proposed project on recreation, specifically hiking trails, would be extensive. The maps indicate that harvests will be made right to the edges of several popular trails, specifically the Liberty, Brook, Cabin and Big Rock Cave Trails and Old Mast Road. The Liberty Trail, Brook Trail and Old Mast Road are especially historic trail routes. And hauling will lead through two heavily used trailheads, necessitating partial closures for safety purposes. This will have a significant negative impact on the experience of hiking these trails. This makes no sense when there are large areas in the Project Overview map where harvests could be conducted without impacting trails.

It is my strong feeling that most hikers prefer a natural-appearing forest along the trails, and do not like to view clearcuts, patch ("group selection") cuts, slash, stumps, paint markings, flagging and skid roads adjacent to trails (or in the case of skid roads, running across trails). This is corroborated in the FEIS for the Forest Plan (page 3-451): "The benefits of high quality scenery found on the WMNF are numerous despite the fact that a dollar value is seldom assigned. 'Research has shown that high quality scenery, especially that related to natural appearing forest, enhances people's lives and benefits society'[hellip]The scenic attributes of the White Mountains are also central to the tourism industry important to the state of New Hampshire." [Italics mine.]

Why can't this project be designed to avoid cutting alongside the trails? I believe that two of the Forest-Wide Management Guidelines from the current Forest Plan (or LMRP) should be more fully incorporated into a revised design for this project:

Recreation Guideline G-2, Page 2-19: "Use should be managed to prevent negative impact to natural and cultural resources, and to the recreation experience." While this guideline specifically refers to management of recreation use, would it not apply to other uses that affect the recreation experience?

Vegetation Management Guideline G-2, page 2-29: "Timber management prescriptions adjacent to trail corridors should be modified to protect trail- and recreation-related values (e.g. uncut zones, slash disposal, trail relocation, and/or use of uneven-aged management)." [Italics mine.] This guideline, in particular, seems to have been completely bypassed in designing this project. Leaving uncut zones along trails is clearly an option to be considered under the Forest Plan, and I believe it should be applied wherever possible.

To comply with these guidelines, I urge you to eliminate or move several of the proposed harvest units along the trails, and in all other cases where harvests are planned near trails, I urge you to leave uncut buffer zones. It would not seem difficult to design these harvests to allow a buffer of at least 150 feet, and preferably more, as recommended in the "Good Forestry in the Granite State" publication. Mitigation as stated in RE-2, "Harvest slash within 50 feet on either side of hiking and snowmobile trails and forest roads would be removed or lopped and scattered to lie within three feet of the ground" is totally inadequate to protect trail-related values.

The Draft EA's consideration of impacts on recreation is almost nonexistent, as reflected in this statement, which I must regretfully label as preposterous: "The proposed action will not have significant impacts on the quality of life or recreation experiences of forest users in either the short or long term[hellip]. The impact is temporary and short-term in nature. Due to the limited nature, extent, and duration of the project, the project would not contribute cumulatively to impacts to recreation in the analysis area and the limited extent of the impact indicates

that it is not significant." Of course there will be significant impacts on recreation experiences, in both the short and long term, as these projects are typically extended over five years or more. No information is provided on the timing and duration of trail closures and partial trailhead closures. Cutting alongside five trails and hauling logs out through the Liberty and Ferncroft trailheads will clearly have significant negative effects on the recreation experience in the project area. These proposals continue a trend across the WMNF of prioritizing timber harvest over recreation values. The proposed mitigation measures are totally inadequate. The seven Recreation Design Criteria, which would do little to adequately protect recreation values, would not be necessary if this project were properly designed to avoid impacts on trails and trailheads.

Hikers are constantly urged (and rightly so) by the WMNF to "leave no trace" along the trails. I strongly feel that the WMNF timber harvest program should be at least held to the standard of "leave as little trace as possible" and should take great care to minimize effects to the trails. And what kind of example does it set for hikers when they see this sort of impact on the trails from timber harvesting? Or, for that matter, the prominent flagging that marks proposed cuts, or the garish paint slashes that mark harvest boundaries and remain visible for years? When hikers do that kind of thing it's rightly criticized as littering the forest. The Forest Service is sending a message of, "Do as I say, not as I do."

Two other points are worth mentioning.

The rationale for this vegetation management project is based on an outdated Forest Plan, which is now 18 years old and does not reflect changes in conditions and scientific knowledge that have occurred since 2005. The plan is supposed to be updated every 15 years.

In the listing of Executive Orders, why is there is no mention of Executive Order 14072, regarding protection of old growth and mature forests? Why was this not deemed relevant?

I must regretfully conclude that this project is poorly designed, with an inordinately heavy negative impact on recreation values. It should be sent back to the drawing board for significant revisions.

Thank you for your consideration.