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Comments: The Blueberry Ledge Trail begins some yards from my front door. For decades, I have appreciated the care that is continuously taken to maintain the surrounding trails that I now walk, nearly daily with my dog and sometimes 5-year-old grandson. The natural beauty of the forested landscape, sometimes chaotic, sometimes pristine delivers a sense of wonder and awe that are rare and that I am deeply grateful for. The Forest Service plays a role in caring for this forest and I have been grateful for that too, which is why I find the current proposal for project #57392 so disappointing and finally maddening.

By your own admission, the current Forest Service Plan of 2005 is out of date. Before embarking on a project of this size the forest service plan must be updated with new goals that fully consider current understanding of forest management and incorporate, as best we can, the realities of climate change. I hope a new plan will look at our local forest and its role in a larger New England ecosystem.

The assessment begins with this statement: "the purpose of this management area is to provide a sustainable yield of high quality timber products" which you later clarify is to benefit local economies. There could hardly be stronger proof that the 2005 plan is badly skewed and not towards a public benefit. As a case in point, how was the goal of 6 million board feet derived? What net revenue will be generated from each of the three sections, how long before regeneration in these three sections will provide another 6 million board feet and if not again here where else? In short, is the stated harvest of 6 million board feet sustainable in land managed by the forest service? Let me say that I wholeheartedly support foresters and their industry - I use wood products daily - but we need to be clear about to what benefit this particular forest and its management should be directed.

Once the timber harvest is stated as the lead purpose in the outdated plan, it is difficult to fully accept the other forest management goals at face value or as the primary focus of proposed actions. In my mind, the plan has not clearly distinguished the benefit of timber versus forest and the two very different goals have become muddled. Later under habitat, the proposal states "that existing conditions in the Sandwich Habitat Management Unit do not meet Management Area 2.2 Habitat Composition and age class objectives described in the forest plan." This leads me again to question the objectives in the 2005 plan especially if the purpose is "to provide a sustainable high quality timber." Many later actions seem defined simply to achieve the objectives of a plan that needs to be reconsidered.

Under "Decision to be made" we learn that the Saco district ranger "must determine whether the proposed action would have significant impacts... and therefore whether an environmental impact statement must be prepared."

Knowing that an impact statement takes time and costs money, it was not surprising to read later that under hydrology and noise (p. 20), soils and streams (p.21) and wildlife (p.22) no significant impacts were estimated. Those conclusions are rarely supported and sometimes obviously false. An environmental impact statement is clearly called for.

Lacking any expertise, I find the scale of this project and its impacts nearly impossible to imagine. I have to wonder whether 648 acres out of 1,352 were needed if forest health, animal clearings and regeneration were the primary goals. I note that in my Ferncroft neighborhood, there are many openings in adjacent private lands. The areas selected for this proposal are frequently visited for their trails and deeply loved for their undisturbed, natural beauty. Logging will have temporary impacts to deter visitors, but spoiling the natural beauty may have more lasting consequences. What other sites were considered for timber, habitation and wildlife goals? The forest service by law must provide reasonable alternatives to its proposal. A no-action alternative does not satisfy this requirement.

To assure the community that the current proposal is sound, the forest service should provide examples of similar projects in both size and activity that it has carried out in the last 3, 5 and 10 years and persuade us that this project can be done well and achieve stated goals. I asked for this in my scoping comment.

Although the health of the forest, its fauna and flora, and the role of the forest in ameliorating climate change are by far my primary concerns, I find a number of other specific deficiencies in the proposal, among them:

- Lack of buffer zones near trails

- Consideration of impacts on hiking and ski trails,
- Impacts of closure of parking lots,
- Consideration of impacts of landing sites,

Finally, as far as I can tell the community and public have been largely left out of the development of this plan.

Though p. 30 includes a long list of groups consulted, it is not clear how they were consulted. Besides one public meeting long ago, I have seen no notices, publications. We deserve the opportunity to meet with the forest service in person and in virtual meetings.

I oppose the current plan.

Respectfully submitted,
Genevieve Christy