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Comments: I am shocked and saddened by the destructive plan to log areas of the Sandwich Range. Having spent many years over the past 60 hiking the trails, from Chocorua to Whiteface and many more, I am dismayed by this ill-conceived, short-sighted plan for many reasons, including ecological, economic, and recreational.

If for no other reason, consideration of carbon sequestration and preservation of mature forest demand that this plan be abandoned. Biden's 2022 Executive Order 14072 calls for the protection of old-growth and mature forests on federal public lands like the White Mountain National Forest. Yet since according to Forest Service staff, there has been no guidance provided regarding this executive order, it is not being incorporated into logging proposals. This is short-sighted and contrary to federal mandates: Any action undertaken in the Sandwich Range should be consistent with the executive order to protect and preserve America's mature forests, which excel at removing carbon from the atmosphere, support biodiversity, and enhance water quality for downstream communities. Old trees store vastly more carbon than younger trees (Moomaw W.R, et al. 2019. Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good. *Frontiers in Forests and Global Change*. doi.org/10.3389/ffgc.2019.00027; N.L Stephenson, et al. Rate of tree carbon accumulation increases continuously with tree size. *Nature*. 507, 90-93 (2014); Lutz et al., Global importance of large-diameter trees. *Global Ecology and Biogeography* (2018), <https://doi.org/10.1111/geb.12747>; Luyssaert, S., et al. 2008. Old-growth forests as global carbon sinks. *Nature* 455::213-215. doi.org/10.1038/nature07276.). Logging mature forests is inconsistent with federal mandates for climate protection (Tara W Hudiburg et al, 2019. Meeting GHG reduction targets requires accounting for all forest sector emissions. *Environ. Res. Lett.* 14 095005.)

Furthermore, the Draft EA states the carbon effects of this project will be negligible and inconsequential. This claim is unsubstantiated and contrary to the science. Carbon emissions attributable to harvest currently account for 85% of the annual forest carbon loss from U.S. forests, dwarfing that of losses from insects, fire, wind and drought combined (Harris et al., 2016). The FS claim also ignores that most of the trees and shrubs in these forests - including oaks, beeches, birches and the conifers - are ectomycorrhizal, meaning their roots are symbiotic with fungi that live on the photosynthetic products of the plants in exchange for providing them with nutrients, especially otherwise unavailable nitrogen. When the trees are cut, the ectomycorrhizal fungi, which comprise a substantial part of all soil carbon, die with profound consequences for the soil biota and structure, including carbon pools. Much of carbon storage in mature forests is in the soil, which becomes an emitter of carbon for decades - even many decades - post-disturbance. (C. Petrenko and A. Friedland, Mineral soil carbon pool responses to forest clearing in Northeastern hardwood forests, *Bioenergy* (2014), doi: 10.1111/gcbb.12221)The USFS cannot ignore these significant carbon emissions in considering management of the White Mt. NF.

The USFS is required by Congressional mandate to benefit the American people. Economic benefit means protecting our National Forests, which comprise the greatest terrestrial carbon sequestration resource that the American public has the means to protect. Short-term financial gain from logging cannot make up for the loss of carbon sequestration, which has vastly greater economic value than any sale of board feet, with its associated high carbon emissions, both short- and long-term, since most wood products have a lifespan of decades or less. (Tara W Hudiburg et al, 2019. Meeting GHG reduction targets requires accounting for all forest sector emissions. *Environ. Res. Lett.* 14 095005)

Protection of Trails, Recreation and the Recreational Experience: The USFS acknowledges what we all know: the project area has very high recreational use and value. But the Draft Environmental Assessment (EA) says almost nothing about the impact of the proposed logging action on hiking trails in the Sandwich Range, saying it will be addressed in a separate report, yet to be filed. The proposed logging would take place along or very near

at least four trails in the Ferncroft area, four trails in the Mt. Chocorua area, and in the Guinea Hill area near Mt. Israel. USFS proposes "buffers" along these trails of just 33 to 66 feet-close enough for trail users to have a front-row view of clear cuts. The Draft EA also fails to address the impacts of noise, trail closures, truck traffic, parking availability, etc., for recreational users of the forest.

Consideration of Alternatives: A proposal of this magnitude should require an EIS with several possible action alternatives. This EA does not. The USFS is operating from an obsolete forest plan, in which forests are maintained for the purpose of continuing commercial harvest. The USFS should consider meaningful, good-faith alternatives to logging, especially in light of the executive order regarding mature forests, but also based on the new science and new ecologically informed thinking around the preservation and maintenance of mature forests for carbon reduction, climate goals, and recreation.