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Comments: To whom it may concern,

Not only I, but also other family members from Massachusetts and New Hampshire have hiked and skied extensively in the Ferncroft area of the proposed Sandwich Vegetation Management Project. My mother, largely because of her love for the remote, unspoiled nature of the Sandwich Range, had wished to be buried in the small cemetery adjoining the parking area of the Ferncroft trailhead, where she lies since 2007.

For the past 12 years, I have been closely involved with private and public sector forest entities in Switzerland and have co-authored studies on the sustainability of biomass resources for the Swiss Federal Office for the Environment. In densely settled and climate-conscious Europe, logging operations are subject to an extensive permitting process, presumably similar to that which has been performed for the current project in the Sandwich range.

After reading the environmental assessment, I have the following concerns regarding the recreational use of the Ferncroft trail system and possible negative economic effects on the local economy.

a. Simply stating that «one side of the parking lot may be closed during hauling operations in all seasons» entirely disregards the specific dangers of fully loaded logging trucks transiting a parking area often full of elderly hikers and families with young children. In addition, Ferncroft Road is sometimes barely navigable by conventional passenger vehicles. The current road surface and bridges are in no way suited - with regards to traffic safety or maintenance - for bidirectional traffic with heavy logging equipment.

RECOMMENDATION: Logging access should be barred from the Ferncroft Trailhead. An alternative access should be evaluated.

b. The stipulation that «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 not sufficient to retain the valuable untouched feel of the area for recreational activities. Walking along a path with a 3-foot high and 50-foot wide «sidewalk» of forest slash on both sides is completely incompatible with the recreational objective of our national forests, that is, the enjoyment of being in an unspoiled natural environment.

RECOMMENDATION: A 100-foot corridor on either side of hiking and snowmobile trails should be preserved as-is and remain off-limits to logging activities. The existing stipulation should apply to forest roads only.

c. The locations of existing and proposed new «log landings» are not documented. These highly trafficked and high-noise areas should be defined to the extent possible.

RECOMMENDATION: Log landings should be sited an adequate distance from hiking trails and other areas of pedestrian activity, including spiritual sites such as churches and cemeteries.

d. The schedule and duration of the logging activities («over a period of 5 to 10 years») are inadequately defined. In order to limit the adverse effects on recreational use, logging activities must be limited to as short a period as possible, with predefined start and end dates.

RECOMMENDATION: The logging activities for each of the 3 zones should be planned in more detail, with start and end dates clearly stated in the project proposal.

e. The only allusion to project economics is the harvest of «estimated six million board feet of forest products». Nothing is said of the type of product, quality of product, possible purchasers, estimated proceeds or use of the proceeds, let alone the cost of the project itself. Judging from the available project documentation, the harvested

wood will be primarily from deciduous species, which is generally not well-adapted for building purposes. Alternative uses include renewable biomass energy and pulp/paper production, both of which generally attract lower prices. Six million board feet correspond to roughly 14'000 cubic meters of wood, which would gather about one million dollars in the high-priced Swiss market. I estimate the proceeds in rural New Hampshire to be roughly half that.

In order to complete the economic analysis, estimates should be made for the total cost of the logging project as well as for the benefits resulting from the recreational use and CO<sub>2</sub>-storage of the existing forest.

**RECOMMENDATION:** An overall cost-benefit analysis should be made to illustrate the project bottom-line to all stakeholders (not least the National Forest Service itself).

f.No mention is made of the effect on the local economy. In addition to reduced incomes from tourism, it can by no means be taken for granted that local business will profit from the logging operations if contracts are awarded based solely on price.

**RECOMMENDATION:** The project should include a binding provision to reimburse the local economy for proceeds lost as a result of reduced recreational use and lost tourism opportunities. In addition, contracts for the logging operations and proceeds from the harvested wood should benefit the local economy to the largest extent possible.

I sincerely hope that the project management will address these objections and consider my recommendations.

Best regards  
Richard Chrenko