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Comments: I own a home in Tamworth and have been hiking the Kelley, Cabin, Cave Rock and Liberty trails for 15 years. First, I'm concerned about the impact of this project, particularly the clearing of 1-2 acres in multiple locations (to be determined at a later date) in the group selection areas that abut hiking and x-c skiing trails. The impact on the scenic and recreational value of the project area is concerning, not to mention the impact on the local access roads and the Ferncroft and Liberty trailhead parking lots that will be used by logging trucks to haul timber. I attended the site visit/field trip on Sept 24 and many questions remain unanswered. I recall hearing an earlier proposal did include a recreation evaluation and management plan but that was deleted because it "complicated" the EA process. I object to the current proposal which is to address recreation management at a later date. It's not appropriate to delay analyzing the project's impact on local recreation for convenience or expediency when the proposal itself acknowledges the high recreational value of this forest area.

The Saco District Ranger indicated buffer areas to protect trails will be as little as the standard 33 to 66 feet from the trail and that no buffer is required. Simultaneously, the EA indicates the project will have "no significant impact" on the quality of recreation which is not possible. Staging sites and skid roads for logging trucks to access the forest will need to be created. The noise, mess and cleared areas created within feet of trails is a significant impact that needs to be assessed now not later. The plan should be paused to evaluate the impact on recreation as originally intended and a recreation management plan developed before the project is approved.

The Saco District Ranger has not provided a satisfactory response to concerns raised about EO 14072, the intent of which is to protect and preserve mature forests that exist throughout the project area, not just old growth forests as he indicated. EO 14072 is also not simply a directive to conduct inventories of mature and old growth forests. If the Saco District Ranger lacks "guidance" as to implementation of the order as represented, then it makes sense to pause the project until the necessary guidance is obtained. Only then can the Saco District Ranger say the project complies with the new mandates of EO 14072. The fact that project planning began before the enactment of the order is not an adequate reason to ignore an order that is known to exist before the plan has been finalized and approved. I would expect guidance to be forthcoming in the near future. Waiting for it is reasonable and appropriate under the circumstances.

Similarly, the Saco District Ranger stated the use of an outdated service plan more than 15 years old is necessary because the service plan hasn't been updated since (i.e., it's the most current service plan available). Apparently, there's no funding to update the service plan. Step one should be updating the out-of-date service plan before developing a proposal of this scale in a highly desirable recreation area.

The Saco Ranger District has also not provided a satisfactory answer regarding the projected revenue anticipated from this project. How can the USFS advance this project without conducting a cost/benefit analysis and projecting the revenue it will generate? Why would commercial loggers participate (assist the USFS in forest management) unless they're guaranteed to profit from harvesting quality timber? These questions need better answers.

At this time, I oppose the plan in its entirety. At a minimum, the project should be paused to address the concerns I and many others have raised.

Thank you,  
Linda Medeiros