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Organization:

Title:

Comments: I oppose the proposed Sandwich Wilderness logging project for a variety of reasons:

1. We need to store more carbon
2. We need mature forests to hedge against an insecure climate future
3. We cannot continue to fund the the Forest Service with the the product it is supposed to protect.

I support the comments published by the Wonalancet Preservation Association:

Our Concerns

Preservation of Mature Forest:

In 2022, President Joe Biden signed Executive Order 14072 calling for the protection of old-growth and mature forests on federal public lands like the White Mountain National Forest. Forest Service staff say they have not received guidance regarding this executive order, so it is not being incorporated into the proposed logging. We believe this is short-sighted: 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.

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.

Climate Change and Carbon:

The Draft EA states the carbon effects of this project will be negligible and inconsequential. That claim is both unconvincing and unsubstantiated. For example, it is suggested that cutting will significantly affect only the above-ground storage of carbon. This is demonstrably inaccurate. Most of the trees and shrubs in our forests - including oaks, beeches, birches and all 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. More broadly, shouldn't the Forest Service, in all its branches, practice forest management that actively seeks to increase long-term carbon sequestration? This is especially appropriate for an agency like the US Forest Service noted for setting goals with a very long time horizon. We ask that this plan for the Sandwich Range include measures to increase forest carbon sequestration.

Financial Motivations / Lack of Local Benefit:

The Draft EA states one priority of the planned logging operations is the private commercial harvest of 6 million board feet of forest products, with revenues helping fund USFS activities. These financial considerations are not necessarily in line with the USFS's other stated goals of preserving the health and integrity of the forest for its many uses and users. USFS has touted, for example, the removal of diseased Beech; but it is unlikely that USFS will accomplish its goal of producing 6 million board feet (nor will private loggers find it profitable to log) without

also cutting large volumes of perfectly healthy mature hardwood trees.

Consideration of Alternatives:

Environmental Assessments usually include several possible action alternatives, but this one 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 commercial logging, especially in light of the executive order regarding mature forests, but also new science and new ecologically-informed thinking around the preservation and maintenance of mature forests for carbon reduction, climate goals, and recreation.