

Data Submitted (UTC 11): 10/23/2023 9:48:15 PM

First name: Anne

Last name: Foley

Organization:

Title:

Comments: I am a resident of Tamworth, NH, with my home located less than two miles from the Liberty Trail, one of the three sites for the proposed Sandwich Vegetation Management Project. I am writing in opposition to this project in its entirety as currently configured -- not because of the inevitable noise and truck traffic that I will endure due to my close proximity to one of the sites, but because of several omissions on the part of the Forest Service in its draft Environmental Assessment (EA): (1) its failure to address and account for current federal policy on forest protection; (2) its failure to address and account for current science on the role of the forest in reducing carbon emissions and slowing down climate change; and (3) its failure to give due consideration to enormous impact that the proposed project will have on all those who cherish and use this special area.

Current federal policy and current science: In Executive Order No. 14072, issued in April of 2022, President Biden recognizes the critical importance of old-growth and mature forests in helping to reduce climate change by capturing greenhouse gas emissions and declares that "[i]t is the policy of my Administration ... to pursue science-based, sustainable forest and land management ... and deploy climate-smart forestry practices and other nature-based solutions to improve the resilience of our lands, waters, wildlife, and communities in the face of increasing disturbances and chronic stress arising from climate impacts." In order to advance this policy, President Biden directs that forests on federal lands must be managed with several objectives in mind, including the promotion of the continued health and resilience of these forests, the retention and enhancement of carbon storage, and the enhancement of climate resilience. In support of its draft EA, the Forest Service relies on a forest plan from 2005; there is no reference to Executive Order No. 14072, even though the EA was updated on July 27, 2023. Science has progressed since 2005 and the adverse effects of climate change on our environment have also increased. As reflected in the Executive Order, federal policies and priorities with respect to forest management is now focused on conserving old-growth and mature forests and managing forests in a way that is "climate-smart." The Forest Service, therefore, must reassess the Sandwich Vegetation Management Project to ensure that it is consistent with current science, the increasing climate crisis, and current federal policies on forest management.

Recreational Value of the Sandwich Range: The Sandwich Range is a beloved area to residents and non-residents alike. Whatever the season, the trails are populated, as evidence by the number of vehicles parked at the Ferncroft and Liberty trailheads on a daily basis, all year round. Use of the trails benefits not only hikers, skiers, and snowshoers, but also the local economy. The Forest Service recognizes that both of these trailheads are high use areas, but concludes that there will be no significant impact on the recreational value of these areas since the project is temporary and of short duration, and accommodations will be made -- such as by allowing for some parking and by rerouting trails. These proposed accommodations, however, are insufficient to counter the significant disruption that will be caused to both trail users and local businesses.

Throughout the draft EA, the Forest Service emphasizes that the primary purpose of the proposed project is commercial in nature -- to provide a sustained yield of timber products. This purpose does not align with current federal policy and current science, and fails to appropriately evaluate the impact of the proposed logging project on those most affected. Accordingly, I respectfully request that the Forest Service reassess the Sandwich Vegetation Management Project and reconfigure as appropriate.