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Organization:

Title:

Comments: Objection to the Sandwich Vegetation Management Project (SVMP)

To whom it may concern,

Please find enclosed my strenuous objection to the Sandwich Vegetation Management Plan, as described by the Final Environmental Assessment and Draft Decision Notice.

"Concise Statement"

I object to the proposed Plan for a multitude of reasons, all which are encompassed in my previously written public comments on the Draft Environmental Assessment, submitted on 8/30/2023 and 10/23/2023.

The Plan is ill-conceived and fails to demonstrate that the many harms it will cause are outweighed by any prevailing interest of the US public or the US Forest service, other than to meet general internal quotas or goals for the commercial harvest of lumber [mdash] an objective which is not stated directly in the supporting documents.

Moreover, the vast majority of public comment submitted with regard to this project was submitted in opposition to it. This alone argues that the plan should be withdrawn, the decision reversed, and that the USFS should return to the drawing table regarding this proposed project.

The Draft Environmental Assessment (DEA), Final Environmental Assessment and Draft Decision Notice demonstrate an insufficient and flawed process, in which the US Forest Service has ignored, obfuscated and/or dismissed many compelling reasons to reconsider the proposed action, detailed in this objection.

The proposed action is inconsistent with the US Forest Service' mission of preserving and protecting forest; and it is inconsistent with the US Forest Service role in preserving and promoting recreational use of the White Mountain National Forest. The proposed action is also in violation of the National Environmental Policy Act for its failure to meaningful consider alternative actions.

I further object to the proposed action for the following reasons:

Failure to Consider and Evaluate Alternatives

As I wrote in my 8/30/2023 comment:

It is important to note that in addition to the lack of specific information in many areas as detailed below, the Assessment and plan offer no meaningful consideration of alternatives, including no action. Council on Environmental Quality (CEQ) regulations require that federal agencies, including USFS, shall "inform decision makers and the public of reasonable alternatives that would avoid or minimize impacts or enhance the quality of the human environment."

The USFS is required to consider and assess reasonable alternatives; yet the USFS has not done so. The USFS should re-evaluate alternatives, including no action.

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The USFS has failed to justify its finding of "No Significant Impact"

The USFS finding of "no significant impact" is unjustified, flawed and inaccurate.

As mentioned in my comments on 8/30/2023,

[hellip] The Report makes the categoric claim that "The proposed action will not have significant impacts on the quality of life or recreation experiences of forest users in either the short or long term." (32)

What is the basis for this conclusion? The proposed action will occur on, along or adjacent to at least six popular hiking trails in the Sandwich Range region, and, as stated before, the Assessment mentions no buffers between the proposed actions and these trails. Meanwhile, the Assessment refers repeatedly to anticipated skid crossings with trails, in some (unspecified) cases potentially requiring (unspecified) trail relocations. And the actions will occur over a 5 to 10 year period. It would seem to stand to reason that the proposed action will have significant impacts on the quality of life or recreation experiences of forest users, at least in the short-term and possibly in the long term, depending especially on the nature of the actions being undertaken on, along or adjacent to these trails.

The USFS should revisit its finding of "no significant impact," particularly with regard to recreational use of the proposed project area.

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The proposed action fails to sufficiently consider and evaluate impacts on recreation:

The proposed action would take place in an area used heavily for recreation, by the USFS own acknowledgement. The USFS has failed to properly assess and address potential impact of the proposed action on recreational use of the project area, especially its various hiking and skiing trails, which are heavily used in all seasons.

As I noted in my comments on 8/30/2023 and 10/23/2023, the USFS has failed to conduct a thorough evaluation of impacts on recreation and should do so before moving forward with the proposed action.

The USFS, by its own admission, removed an evaluation of impact on recreation management from its Draft and Final EA, with recreation management to be "analyzed as a separate project."

The decision to remove a recreation management plan from the environmental analysis was ill-conceived and improper, especially given the myriad impacts the proposed action will have upon recreation, from access to trails to destruction of scenery, to noise, to road construction and the building of landing sites. As I repeatedly stated in my public comments, none of these factors have been sufficiently evaluated for impact on recreation.

The USFS states without justification that "the proposed action will not have significant impacts on the quality of life or recreation experiences of forest users in either the short term or the long term."

This conclusion is both inadequate and absurd, as the USFS has already indicated that the proposed action will take place on or along several hiking trails, may necessitate trail closures, and will affect parking and access to

the trails, in addition to the damage to scenery and quietude that will take place along trails.

The USFS analysis of impacts on recreation was insufficient and inadequate. The USFS should conduct a thorough evaluation of potential impacts on recreation.

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The proposed action fails to include a meaningful and thorough assessment of carbon impacts.

As stated in my 8/30/2023 comment:

Rather than provide a meaningful or even half-baked attempt at assessing the consequences of logging the WMNF, the EA simply compares the project area to [hellip] the world [hellip] and declares it, by virtue of that comparison, "not significant."

As Standing Trees notes in its public comment, a court recently ruled on a similar assertion by USFS, noting:

"Under this logic, the USFS could always skirt "hard look" analysis when doing a carbon impacts review by breaking up a project into small pieces and comparing them to huge carbon stocks [hellip]"

The final EA and draft decision notice fail to correct this gross oversight. The USFS should conduct a meaningful assessment of carbon impacts that includes cumulative impacts from all USFS logging activities.

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The proposed action fails to take into consideration Executive Order 14072, which calls for the protection of not just "old growth," but also "mature" forests.

As stated in my comments, the proposed action flies in the face of Executive Order 14072 and its provisions regarding "mature" forests.

The USFS is disingenuous in stating that "there was understandable concern about old growth habitat and the Executive Order 14072."

In fact, many public comments, including mine, referred to concern for "mature" forest, which presumably lies within the proposed action area. The USFS has failed to assess the extent to which the proposed action affects "mature" forests and has failed to consider Executive Order 14072 in this regard.

While I do understand that the Sacco District Ranger may not have received guidance on how to implement this order, that is all the more reason that the USFS should not engage in the proposed action and instead should hold off pending further guidance. Failing to do so contributes to the widespread belief that the USFS Sacco District is trying to get this logging action done before it is inevitably instructed not to log mature forest.

The USFS should not move forward with the proposed project until it gets guidance regarding Executive Order 14072.

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The USFS has failed to sufficiently evaluate impacts of proposed action on endangered species, streams, and soils.

As I stated in my 8/30/2023 comment:

Soils: As stated by Standing Trees in their comment: The Draft EA also fails to provide any analysis, discussion and clarity surrounding localized impacts on soil resources. I endorse this comment.

[[hellip]]

Endangered Species: It is of serious concern that the EA makes only cursory reference to the potential impact of the proposed action on the Northern Long-Eared Bat (NLEB).

[[hellip]]

Streams: As stated by Standing Trees in their comment: "The Draft EA does not describe any potential impacts on perennial streams, nor provides information for the public to evaluate." I endorse this comment.

The Final Environmental Assessment and Draft Decision Notice fail to address these issues.

The USFS should conduct a more thorough analysis of potential impacts on streams, endangered species, and soils.

There is no defensible reason to engage in the proposed action.

The USFS has failed to assess myriad potential impacts from the proposed action, reaching a conclusion of "no significant impact" without evidence or due diligence. At the same time, the USFS has offered insufficient justification to move forward with the proposed action for any reason.

There is no reason to move forward with this project, other than the Forest Service's historic and present motivation to line its own pockets and those of the timber industry by logging public forest. The USFS is on the wrong side of history here, and should know that.

Thank you,

Sincerely,

Isaiah M. Thompson