

June 7, 2018

USDA Forest Service
Attn: Brett Hillman
2358 Depot Street
Manchester Center, VT 05255

Re: Early Successional Habitat Creation Project #53629

Dear Mr. Hillman:

Thank you for providing the opportunity to submit comments on the Early Successional Habitat Creation Project #53629. I appreciate the research, thought, and work that has gone into this plan. While I am generally in agreement with the goal of managing our forests for long-term health, I do have some concerns about some details in the Scoping Document for project #53629. I respectfully submit the following comments and questions related to project #53629.

Clean and Healthy Water

Forests are a critical source of clean and healthy water for humans, plants and wildlife. Vermont is currently struggling with water degradation due to many sources of water pollution and the results of climate change. The Vermont Agency of Natural Resources has identified streams across the state that meet the criteria for A(1) classification. These streams show excellent/very good biological and chemical health, aquatic biota, wildlife, and aquatic habitat.

1. What research has been done to identify if any of the proposed vegetative treatment is within the watersheds of streams or water sources that meet the exemplary quality standards for A(1) classification?
2. What controls and monitoring will be done to protect the watersheds for streams and water sources that meet the exemplary quality standards for A(1) classification?
3. What monitoring will be done to measure the impact of the vegetative treatments on streams and water sources that meet the exemplary quality standards for A(1) classification?
4. What logging standards/restrictions will be in place to protect streams and water sources?
5. Have these logging standards/restrictions been independently reviewed and analyzed in order to validate that they will effectively protect the watersheds of streams and water sources that meet the exemplary quality standards for A(1) classification?
6. What monitoring will be in place to ensure adherence to the USFS logging standards/restrictions?

Native Plants and Wildlife

1. Have the USFS logging standards/restrictions been independently reviewed and analyzed in order to validate that they will effectively protect the habitat areas for protected plants and wildlife?
2. How will the land impacted by the vegetative treatments be placed back into their natural condition to support the health of native plants and wildlife?

Carbon Sequestration

Many scientific peer-reviewed studies show that forests absorb a significant amount of CO₂. This is critically important to offset the amount of CO₂ being added to the atmosphere.

1. Has any analysis been conducted to determine how much CO₂ absorption ability this project and the associated vegetative treatments will reduce?
2. If yes, what is the impact to CO₂ absorption?
3. How will this loss of CO₂ absorption be off set?

General Questions:

1. The Scoping Document for project #53629 states that the vegetative treatments will be accomplished using the following methods - Clear Cut with Reserves, Patch Cuts, Shelterwood, Group Selection, and Whole Tree Harvesting. However, the Scoping Document does not contain details about how many acres will be impacted by each of the methods. Has this been decided? If yes, please provide how many acres and the proposed locations of each of the vegetative treatment methods.
2. Why is Clear Cutting with Reserves being considered as one of the vegetative treatment methods? Are there other methods that might be as effective with less negative impact on the land, plants, and wildlife?
3. Does the USFS/GMNF have sufficient staff to adequately monitor the logging activities to ensure that they adhere to the standards required to protect water and wildlife?
4. This plan appears to significantly increase the amount of logging within the Green Mountain National Forest. Why is the amount of planned logging being increased?
5. What process will be used by the USFS/GMNF to ensure that the prices paid by loggers is providing the best return for the wood being extracted and properly compensating the USFS/GMNF for any and all costs (monitoring, managing, replacing & reseeded, etc.) incurred?
6. Is there a documented plan of what actions will be taken on the land that is affected by the vegetative treatments?

I request that you provide answers to my comments and questions in writing. You can send the answers to my home address – PO Box 207, Ripton, VT 05766.

Thank you for allowing me to submit comments and questions about project #53629.

Sincerely,
Mark Nelson