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District Ranger
USDA Forest Service
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RE: Robinson IRP

Dear Chris,

Thanks for the opportunity to comment on the Robinson IRP *Environmental Assessment for Public Comment* (EA). I have reviewed the document and associated maps and have the following comments.

As noted in the EA, this area has a long history of multiple use, beginning with Native American occupation and continuing thru to today. During that time, many activities took place in the project area. Not all uses were compatible with some other uses, but it seemed that there was enough area involved that compromises could be made. Trade-offs were recognized. Skid and haul roads became hiking, skiing and snowmobile trails. Clearcuts became blackberry picking areas. An old logging camp became a Long Trail shelter. Numerous other examples could be cited.

In my opinion, Alternative B best carries on this centuries long history of having multiple activities occurring in the project area. This does not mean that all activities can occur on all acres or at all times. But with careful planning and coordination conflicts can be managed. Not everyone will be pleased with some of the activities planned. Others fully support some of the projects. However, the IRP does move the project area toward the Desired Future Condition as outlined in the 2006 GMNF *Land and Resource Management Plan*.

Some specific comments and/or questions follow.

- P6, 1.3.4 **Soil and Wetlands**. Is there evidence that invasive earthworms are damaging the ecosystem, and if so, to what extent? Does this justify the added expense caused by applying the mitigating measure (P B-5, Soil and Wetlands, 1.b.), and the additional expense of monitoring and enforcing the requirement?
- P7, 1.3.9 **Heritage Resources**. There is no mention of the regionally important cairns on West Hill, and the need to identify who built these and for what purpose. This would establish the importance (or lack of) of these heritage resources, and help the FS understand and protect similar sites.
- P17, **Table 4 Proposed large woody debris placement**. The proposed miles of placement for Chittenden and Corporation Brooks seems excessive. How high up a reach will LWD be placed and what criteria is used?

- P18, **Table 6 Proposed White River Restoration**. Tupper Terraces. What is the need for creation of a wetland in this location? Will a site-specific analysis be undertaken for this project?
- P18, **Elm Planting**. Were other methods of controlling surrounding vegetation considered. One time placement of a commercial weed barrier may be more cost-effective than chemical treatment one or two times a year for several years may suffice. Another option may be “tree tubes”, which have been effective for oak plantings and have the additional advantage of providing some protection from beaver.
- P19, 2.1.2.3 **Soil and Wetlands**, Table 7, Temporary Haul Roads. How would soils be loosened to a depth of 4 feet and what is the need to go to that depth? Even with a dozer mounted stump rake, that would be difficult (and expensive). I have walked the length of FR 41 scheduled for decommissioning, and it has revegetated itself with softwoods and hardwoods without roadbed scarification.
- P 22, **Table 10**, Fassett Basin Trail (FT 714). I believe this trail gets more use than the FS recognizes. Mostly from anglers and hunters. The Class 4 Town road extends to the so-called Cary Place. Any work done on that section of the road, should be done in cooperation with the Town of Rochester.
- P24, 2.1.2.7, **Transportation**, Table 13. P413, West Hill Range. Evidence shows that the class 4 Town road extends past the existing FS gate, and goes to the former Dura Kinsman homestead in the meadow. Again, any work on that section of road should be done in cooperation with the Town.
- P26, **Gate placement**. Placement of gates, without providing a turn around spot, is asking for trouble. In the case of FR 42, it would require a vehicle to back up about 1/3 mile before finding a suitable turn around. Or, is this gate proposed for the section of FR 42 beyond the intersection of FR 62? Which end of FR 216 is the gate proposed?
- P26, 2.1.2.8 **Heritage Resources**. In general, The sections which include heritage resources seem to lack detail, and leave a lot to be done prior to project implementation. It appears that there will be more work that can be supported by the current staff. How does the FS propose to handle the legal requirements to protect the heritage resources without severely delaying project implementation?
- **CCC Camp** Most folks would not say that the location of the CCC camp was “...near the intersection with Corporation Road FR 226 “.
- P28, 22.1.2.9 **Special Uses**, Table 17, Maple Tapping. Maple syrup/sugar production is an important industry in Vermont's economy. It appears that the demand for large sap production areas is increasing. I feel that if the FS is allocating 250 ac. to sap production, there should be a competitive bid process for granting the Special Use Permit. In any case, before the SUP is awarded, the proposed permittee should be thoroughly vetted and a performance bond should be required.
- P83, 3.9.1, **Affected Environment**, Table 41, Mt. Horrid Overlook Observation Site. If the recreation opportunity is “Interpretation”, then some type of interpretation needs to be provided. There is none there now.
- P85, 3.9.2 **Direct and Indirect Effects**, Trails. Many, if not most of the trails in the project area were created as a result of timber harvesting activities. With the lack of harvesting in the 1990's and early 2000's. Many folks have forgotten that. Now they think that the trails are exclusively theirs, and are opposed to other uses. The FS needs to have an aggressive program of education to let the public know that the FS practices multiple use.
- I fail to see how the FS can limit harvesting activity trail closures to no more than 5 consecutive days. As an example, how do you propose to keep the Pine Brook trail,

- (including the FR 42 and 62 portions) open during harvesting of the stands in that area?
- P88 Timber Harvesting, Toad Construction, and Maple Tapping Issuance. There is no historic cross-country skiing use in the maple tapping area.
 - P88 Other Proposed Activities. Replacing and relocating Sunrise Shelter. The current shelter is over 50 years old and may require consultation with the SHPO before it is demolished.
 - P100 **3.13** Heritage, 3.13.1 Affected Environment I would not characterize the logging which took place over the entire project area as “limited”
 - Without doing further research, how will the FS determine if a heritage resource will “meet the criteria for inclusion to the National Register of Historic Places”?
 - PB-5 Soil and Wetland 1.b What specific measures will be taken to ensure that equipment has been cleaned of “all soil and debris”?
 - PB-7 Prescribed fire, c. iv. Has the technique of using “nearby duff material” to mulch “all exposed mineral soil” been tried? It seems to me that you are disturbing an existing soil profile. In other soil disturbing activities, it is acceptable to bring in mulch from outside the project area (such as weed-free straw).
 - PB-9 Recreation, 2. Timber Harvest Activities, a. Is there a measurable standard for “minimal disruption”? What may seem minimal to one person may be completely unacceptable to another person.
 - PB-10 j. What is the limit to which snow may be plowed? From a practical view, it doesn't make sense.
 - PB-11 Wilderness, Timber Harvest Activities, b. and c. This creates a de facto buffer zone. I thought the FS had a policy against this. Will this prevent Green Mountain Power Company from doing line maintenance activities in areas where their transmission lines are adjacent to Wilderness areas?
 - PB-13 Heritage. As I have stated before, I don't believe the GMNF currently has the staff to implement the mitigation measures as outlined. Has the additional cost of additional staff or contract personnel been taken into account in planning projects?

I hope you will find these comments useful. Thanks again for the opportunity to provide input.

Bruce

Bruce K. Flewelling