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USDA - Forest Service, Rochester Ranger District  
c/o Christopher Mattrick  
99 Ranger Road  
Rochester, VT 05767

Christopher Mattrick - District Ranger,

Thank you for the opportunity to comment on the proposed Telephone Gap Integrated Resource Project (TGIRP) within the Green Mountain National Forest (GMNF).

I have broken down my comments into two sub categories: Timber Management and Recreation.

### **Timber Management**

I'm fully supportive of sound forest management practices to include timber harvesting. However, I feel it's imperative the Forest ensures that buffers are maintained between harvest units and existing trails within the IRP. According to my reading, the Forest Service uses a Scenery Management System to identify the areas scenic integrity objectives (SIOs). Harvest areas viewed from FS system trails deserve more consideration for resulting impacts when sales are planned and implemented. After hiking in and around the Chittenden Brook area after that timber sale, I have to say things could have been done better. Most forest visitors look at a timber sale with such disdain especially when they are so visible. I saw where a unit encompassed a section of the trail and for someone who sees and knows the value of harvesting timber it simply looked horrible; slash was right to the edge of the trail tread and I actually lost where that trail tread was at one point. This hike occurred during leaf-off so it was just a large open area with scarification on the ground from skidding logs.

I'll say it again - please consider the use of buffers to improve visuals and limit the appearance of forest destruction to those not familiar with timber harvesting. Perhaps providing some onsite informational signs that explains the kind of cuts have occurred

(i.e. over story removal, shelterwood, etc.) and its' benefits to the land/wildlife would be beneficial.

### Recreation

From the *GMNF Forest Plan, pages 8-9*: *"The Green Mountains serve as an abiding connection of Vermont's people to the land and heighten the strong sense of place many feel. With the nation's population projected to double by the end of the 21<sup>st</sup> century, the Forest Service owes a special duty to act in ways that help conserve and maintain Vermont's landscape, its communities, and rural economy. ... Coming decades are predicted to bring further urbanization, sprawl, and loss of open space. As such, our management philosophy continues to be guided by the belief that public land in the Northeast will be increasingly scarce and precious."*

There are several proposed actions which are laid out on lands that have yet to be acquired by the GMNF. Those Rolston Rest lands were acquired by the Trust for Public Land back in 2017 and timelines have consistently changed as to when those lands would actually be transferred into government ownership. I don't find any mention of this in the proposed action. If and when those lands are finally transferred over, the GMNF will be required to then complete a Forest Plan amendment in order to implement some proposed actions based on their assigned management area.

Specifically, the *GMNF Forest Plan states on page 59, Standards and Guidelines for Diverse Backcountry 6.2, under Recreation Standard: S-1: Construction of new developed facilities shall be restricted to those needed for resource protection."*

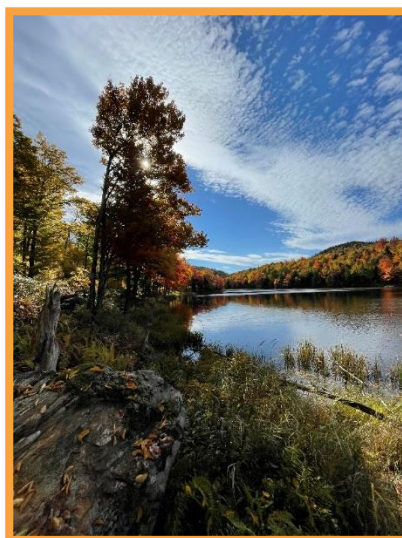
Accepting an application for a new hut from the Vermont Huts Association (VHA) is in direct conflict with the GMNF Forest Plan. The increased recreational use and its possible impacts to the surrounding resources, such as wildlife and nearby riparian areas, must first be analyzed. While I know there WAS a cabin at the South Pond location when those lands were acquired by TPL, the fact of the matter is now there is not. Has there been any consideration in just leaving that area alone in its current state as remote and pristine area? Building huts in remote locations with more likely on the wings does not sit well with me in privatizing our public lands.

The bigger picture here is that the GMNF Forest Plan does not address the build-out of huts, an extensive mountain bike network or backcountry ski zones. This effort has the appearance of getting the cart before the horse in that without an actual plan of what all this looks like in advance of tying these activities to the TGIRP is premature. Based on my own research it appears there are no master plans for either the VHA or the Velemont Trail. Have cumulative effects from the whole "planned" Velemont trail been analyzed? Why is the GMNF not taking a pause in order for these very critical

plans to be developed and vetted appropriately versus forging ahead with no clear picture of how the big picture looks? Doing a plan for an individual hut, and not acknowledging there is a future system of additional huts, is ignoring the cumulative impacts that will result.

The size of these huts needs to be factored as well. *Page 16 of the GMNF Forest Plan, Forest-wide goals, number 15 states: "Maintain or enhance visual resources such as viewsheds, vistas, overlooks, and special features."* The newest hut at Grout Pond is certainly not a hut but more of a cabin. Merriam-Webster defines as hut as: an often small and temporary dwelling of simple construction: SHACK. An on-line dictionary defines a hut as: a small, simple, single-story house or shelter. Is constructing a hut in the South Pond area meeting this forest-wide goal? *Page 58 of the GMNF Forest Plan under desired future condition for this management area states: "When viewed from a distance, human activity will not be evident on some upper elevations of the more noticeable peaks and ridges. Some evidence of activity may be noticeable on lower levels, but will blend with the surrounding landscape. While these areas will be predominately natural appearing, evidence of human use may be evident, but will not dominate."* I would argue that a hut similar to the one constructed at Grout Pond will be visible from several distant locations (i.e. Wildcat Road, Leffert's Pond and maybe even a part of Chittenden Reservoir).

I hike to the South Pond area frequently and have to say it has become one of my favorite spots; the views of the reservoir are outstanding and the serenity of South Pond is what getting away from the hubbub of daily life means. I personally will no longer visit that area should a hut and mountain bike network be constructed – nothing worse than hiking up on a hut with up to 10 people occupying it.



South Pond

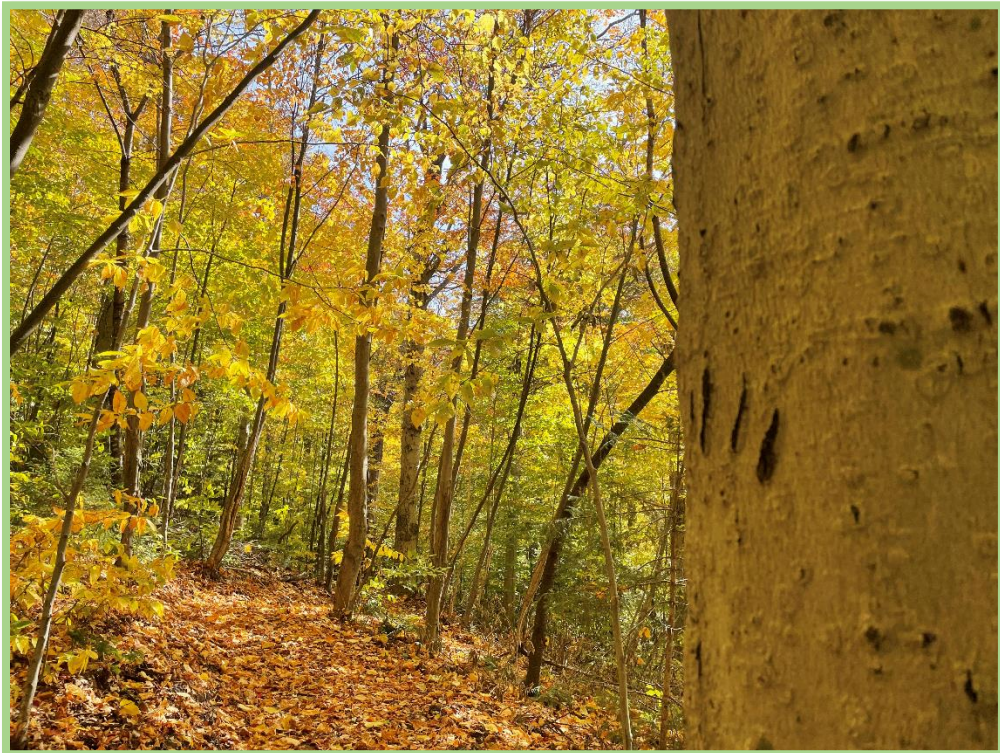
The VHA master plan should also address how the public can reserve a hut on National Forest System (NFS) lands. The current system in place has the appearance of great disparity to those that are not members. Allowing VHA members early access to reservations to the two current huts of NFS lands is wrong! No one should have to pay a membership fee to an organization in order to get early reservation access. The VHA may 'own' the hut but let's not forget that public funds were used to construct those huts and they sit wholly on public lands. The GMNF should be taking a deeper dive into recent reservations. Examine how many dates were secured by members during their week of early access versus how many dates/weekends were then left open to the general public.

There are approximately 33+ miles of new trails proposed, only the trails behind the new Supervisor's Office are identified as being possibly accessible. *Page 35 of the GMNF Forest Plan, Trails Standards and Guidelines states: G-2: Trail maintenance and improvement activities should focus on the reduction of deferred maintenance needs on existing trails before the development of new trails." G-4 states: Multiple use trails should be emphasized over single use trails where the uses are compatible."*

Constructing 33+ miles of new trails that will consist of parallel trails for each single use (xc skiing, snowmobiling, and mountain biking) is irresponsible. Minimizing the number of trails reduces impacts to soil and habitat, plants and animals along with water quality. Our winters are becoming warmer along with increased precipitation and high wind events. It's highly probable that a winter trail that is too wet for summer use is now likely too wet for winter use as well. What management actions are there to deal with deferred maintenance on those trails? The big question: is the objective to have multiple trails for each recreation use or it is to manage for multiple resources and ultimately long-term multiple use? And simply put, why so many recreation trails in such a small project area? Additionally, the mountain bike trails appear to traverse some steep terrain. The general recreating public cannot utilize those trails – only elite mountain bikers that have a tremendous amount of skill and fortitude can actually ride those. Why is the GMNF so hell bent on these socially exclusionary recreation activities?

Below are pictures that depict two separate Bear – clawed Beech trees on the newly constructed Chittenden Brook mountain bike trail. Shouldn't new trail construction avoid these kinds of areas?:





Additionally, 13 new parking spaces are identified in the proposed action, none of which are on the west side of the mountain where a great deal of recreational activities already occur and will be increased should a hut and new trails be constructed. Quick and easy access is what the public looks for so those recreationists that reside on the west side of the mountain may tend to travel to Chittenden versus over the mountain to Killington or Pittsfield to park. I know there are plans for an improved parking area at Lefferts Pond but what about winter access/parking? Any consideration or thought to adding some parking at the end of Wildcat Road where the Class 3 Town road turns to a Town Trail across from the Paquette property?

From the detailed scoping letter: "*South Pond Administrative Access Road*

*There are two existing access roads located on the pending South Pond acquisition. The first section starts at the end of Rockwell Road (Town Highway 83) in Killington, VT and connects to Hadley Lane (currently a private access road) in Chittenden, VT. The second section is Hadley Lane in Chittenden, VT.*

*Once the pending transfer of the South Pond acquisition is complete, these existing access roads would be added to the National Forest Road System as one 2.31-mile long OML 2 road:*

- The Rockwell Access Road section is approximately 0.74 miles long. The travel surface width varies from 12 to 20 feet and ditches are present on each side of the road.*
- The Hadley Lane section is approximately 1.57 miles long. The travel surface width varies from 12 to 16 feet and ditches are present on each side of the road.*

*Both roads would be designated for administrative use only and gates would be installed to control access at the NFS lands boundary on Rockwell Road and at the intersection of Hadley Road (mile post 0.74). Road reconditioning, aggregate re-surfacing, ditch reconditioning, ditch stone lining, gate installations, installation/replacement of cross drainage culverts, and installation of a bridge would be required to meet National Forest System Road standards. This work would be completed within the existing road footprint."*

I was under the impression that OML 2 roads were high clearance roads, seasonally open to the public? Are the taxpayers going to pay for all this work and ongoing maintenance should the hut be constructed at South Pond? How is the VHA contributing to this cost? Why is the road closed to the public if it's for access? The GMNF Forest Plan states for this management area "*The area will be predominately void of roads but any remaining roads will be of low maintenance standard and unimproved.*"

Will the gate that sits just northeast of the “Elbow” at the Long Trail be maintained and secured to keep vehicles out of that area in the non-snowmobile months? In its current state it hasn’t been secured/locked in years.

The snowmobile trail east of Lefferts Pond is proposed to be placed onto where the Catamount Trail Connector was constructed a few years ago. This action further changes the serene nature of the South Pond area as now motorized use will be present in the winter, this could also add for unintended consequences to any occupants of the hut as snowmobiles don’t have quiet hours and operate at all times of the day and night. This is especially true with the changing winters. That’s not what was scoped for the Catamount Connector back in 2019 and I suspect with the magnitude of this project that many folks will not pick up on this change.

Lastly, consideration needs to be given in restricting snowmobile access from the Chittenden Dam over to Lefferts Pond (Catamount/Round Robin Trail) and through that area. Sometime between 2010 and 2015 that area was opened to snowmobile use as it had been previously managed for non-motorized winter use. This action would then afford that area to return to being non-motorized to the junction of VAST RD 32 and the Catamount Connector Trail and proposed new VAST trail. There are very limited areas on the west side of the mountain to avoid snowmobiles during the winter for walking, snow shoeing or xc skiing. Redesignating that short section back to non-motorized use would be a win win for many.

Respectfully,

*/s/Kim M. Kinville*

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