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Thursday, March 9, 2023

Jay Strand
USDA Forest Service
99 Ranger Road
Rochester, VT 05767

Dear Jay,

Thank you for providing us the opportunity to comment on the Telephone Gap Integrated Resource Project. The Green Mountain Club is a statewide member and volunteer driven organization with roughly 10,000 members in Vermont and beyond whose mission is to make the Vermont mountains play a larger part in the life of the people by protecting and maintaining the Long Trail System and fostering, through education, the stewardship of Vermont's hiking trails and mountains. The Long Trail system is managed in cooperation with numerous land management partners and is composed of the Long Trail, running the length of Vermont from Massachusetts to Quebec; all the side trails to the Long Trail; the Appalachian Trail from its departure from the Long Trail in Killington, VT to the New Hampshire border; and the Kingdom Heritage Land Trails in the Northeast Kingdom of Vermont.

The Long Trail runs from the southern to northern end of the Telephone Gap project area, in close proximity to many of the management activities proposed in the scoping information. The GMC's comments on the Telephone Gap project are limited to planned project activities that impact the Long Trail System. The GMC supports the broad science based management approach outlined in the Telephone Gap IRP and believe it is an important projection of the multi-use mission of the National Forest System. In particular, the GMC is supportive of the Recreational aspects of this plan and offers the following comments:

The GMC strongly supports the South Pond parcel acquisition and subsequent permanent protection of the Long Trail and Rolston Rest Shelter. The addition of these lands to the National Forest system is in line with the Forest Plan section 8.2.G.1: *Interests in the remaining privately owned tracts of land within the GMNF proclamation boundary along the LT should be acquired. A corridor at least 1,000 feet in width is desirable to manage and protect trail values.*

The GMC supports efforts to ensure appropriate buffers between forest management practices and the Long Trail corridor. As outlined in the Forest Plan, section 8.2, Standard Guidelines for the Long Trail: *This management area will retain a natural, forested appearance shaped by both natural and human processes. Management practices will be modified to recognize the significant aesthetic and recreational values of these lands.* The Telephone Gap IRP supports this effort by limiting timber stand treatments to areas outside of the Long Trail Management Area. The GMC encourages the absolute minimum number of crossings of the LTMA for timber management activities and requests an opportunity to review all planned crossings in advance with USFS staff.

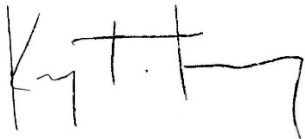
The New Boston Trail is an official side trail of the Long Trail. The trail is co-located with a gravel road for most of its ascent from the trailhead on FR99. It hosts the David Logan overnight site. While the overnight site is located on land owned by the state of Vermont, it is proximate to the federal land boundary and some of the forest management activities proposed. The GMC encourages the USFS to ensure, through timber sale preparation, that an appropriate buffer is left between the trail alignment and any timber management activities. The GMC offers its support to conduct a pre-sale site visit with USFS staff and/or contractors.

The GMC has worked closely with The Velomont Trail Association, VT Huts, and the Catamount Trail in planning appropriate intersections with the Long Trail System in the area of South Pond and supports their efforts to diversify recreational opportunities on the GMNF. Further, the new hut at South Pond will be available to serve Long Trail System users as an overnight lodging alternative to dispersed camping or rustic accommodations on the Long Trail.

Upon incorporation into the National Forest System, the GMC encourages the USFS to ensure proper management of the existing crossing of the VASA and VAST trail in the vicinity of Quimby Mountain with restriction devices, as necessary, and with reference to the GMC's Long Trail System Management Plan. This is in line with the Forest Plan section 8.2.G.1 *Motorized use, both recreational and non-recreational, on the LT footprint shall be limited to those portions of the LT which cross or are located on Forest system roads; State, county, or town roads; and authorized designated crossings. Motorized use on other portions of the LT footprint shall be prohibited.*

The Green Mountain Club remains a committed partner of the Green Mountain National Forest and appreciates the efforts of USFS staff to balance the needs and desires of multiple interest groups to create a holistic approach to natural resource management in the planned project area.

Sincerely,

A handwritten signature in black ink, appearing to read 'Keegan Tierney', with a stylized, cursive script.

Keegan Tierney
GMC Director of Field Programs