



Zack Porter <zporter@standingtrees.org>

Thanks and following up

2 messages

Zack Porter <zporter@standingtrees.org>
To: "Donahey, James - FS, VT" <james.donahey@usda.gov>

Fri, Dec 13, 2024 at 8:00 AM

Hi James,

It was good to see you at the conference and to catch up. Thanks again for visiting.

I believe you mentioned that you thought that there is more old-growth in the GMNF, per the Region 9 definition, than is reported in the NOGA DEIS Draft Ecological Impacts Analysis Report, Appendix 2 (see attached). This made me wonder:

- Could you share with me what old-growth definition, metric, and/or criteria was used to measure the amount of old-growth in the GMNF in the NOGA DEIS Draft Ecological Impacts Analysis Report, Appendix 2?
- How much old-growth, per the R9 definition, is in the TGIRP project area (on USFS-managed lands)?
- How much old-growth, per the R9 definition, is planned for vegetation management (commercial or non-commercial treatments) in the TGIRP Draft ROD (on USFS managed lands)?

Thanks for your help.

Zack

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Standing Trees works to protect and restore forests on New England's public lands.

 **DRAFTEcologicalImpactsAnalysisReport.pdf**
6699K

Donahey, James - FS, VT <james.donahey@usda.gov>
To: Zack Porter <zporter@standingtrees.org>

Mon, Dec 16, 2024 at 1:38 PM

Zack,

It was good to see you too.

I think the confusion with this starts with understanding the datasets/methodology and the use of the definitions and criteria. The Mature and Old Growth Forest technical report relied on FIA data, not stand examination data. It's not clear to me from reading the technical report how they expanded the plot-based FIA data to each fireshed or forest, other than that methodology is still forthcoming (Pelz et al. in preparation). That technical report also cautioned against using the criteria at the stand scale and noted that the definitions and criteria would continue to be refined over time. Without ultimately knowing what any forthcoming policies would be, we did apply those criteria to common stand examination data in Telephone Gap to develop alternatives C and D.

So, to answer your questions. We won't know what imputation methodology was used until they publish that Pelz et al. document. I can say with certainty that they used the same interim Region 9 criteria found in the technical report, but not how they expanded the FIA plot-level data to the entire nation. I would imagine this was some sort of nearest neighbor imputation, but we just don't know.

I think I did calculate the second question, and looking back through my files it's about 2800 acres within Telephone Gap that met the interim Region 9 criteria using common stand examination data. To get that number, I also relied on an imputation process which I described in the Landscape Assessment document. We don't have common-stand examination data for every stand. 2800 acres exceeds what the DEIS projected for the entire National Forest. This is a result of differing methodologies and datasets, and as I mentioned above it's not currently possible to know the location of the 2000 acres of old growth that the DEIS identified on the Green Mountain National Forest. So as I told you on Thursday, it is inaccurate to tell people that we're harvesting 817 acres of the 2000 acres of old growth identified in the DEIS on the Green Mountain National Forest.

We disclosed the third question in a PDF document that was posed to the project website: "Alts C and D stands with EO14072 Characteristics". I think you have this, right?

Does that help?

- James

From: Zack Porter <zporter@standingtrees.org>
Sent: Friday, December 13, 2024 8:00 AM
To: Donahey, James - FS, VT <james.donahey@usda.gov>
Subject: [External Email]Thanks and following up

[External Email]

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