

Data Submitted (UTC 11): 3/8/2023 5:00:00 AM

First name: Torin

Last name: Miller

Organization: National Deer Association

Title: Senior Director of Policy

Comments: On behalf of the National Deer Association (NDA), I am writing to provide our comments in support of the Telephone Gap Project on the Green Mountain National Forest, Rochester and Middlebury Ranger Districts. We are a national non-profit conservation organization with the mission to ensure the future of wild deer, wildlife habitat and hunting. We represent 30,000 members nationwide, including hunters, landowners and natural resource professionals.

The NDA is supportive of the project proposals designed to improve wildlife habitat, restore soils and wetlands, sustain a network of roads and trails, increase recreation opportunities, and timber harvesting to provide wood products for the local and regional economy while enhancing forest health and diversity on approximately 72,000 acres of National Forest System lands on the Green Mountain National Forest on both the east and west sides of the spine of the Green Mountains. The NDA's mission the future of wild deer, wildlife habitat, and hunting relies on active forest management decisions founded in sound scientific principles. The Telephone Gape Project includes multiple management goals from the Forest Plan within the boundaries of the project area, and we support many of those broad goals, including:

- * Even and uneven-aged silvicultural system treatments in the suitable areas designated within the Telephone Gap Integrated Resource Project (IRP) that better align with Forest Plan goals and balance the role forests have in countering carbon emissions through their carbon sequestration and storage capacity;
- * Harvesting forested stands using silvicultural practices to achieve Forest-wide habitat composition and structure objectives while supporting regional and local economies through resource production;
- * Addressing ongoing erosion and sedimentation on some non-system roads and trails throughout the project area, including areas where they have captured and altered surface and subsurface water flow patterns; and
- * Providing sustainable recreation opportunities within the project area including trail use and developed recreation that are sustainable and limit potential damage to resources.

Certainly, significant differences exist between current resource conditions and desired future conditions within the project area as outlined by the 2006 Green Mountain National Forest Land and Resource Management Plan (Forest Plan) goals and objectives. We heartily support specific management prescriptions designed to close these gaps on the Telephone Gap project area.

Specifically, we support:

- * Increased representation of softwood stands, a key winter habitat requirement for northern deer herds, that currently represents only 2-4% of the National Forest System (NSF) lands;
- * Increased representation of aspen habitat and oak hardwood stands both key forage requirements for northern deer herds which currently each represent <1% of the NFS lands;
- * Increased representation of regenerating (0-9 years) forest age classes as it satisfies a desirable winter forage requirement for northern deer herds and currently only represents <1% of the NFS; and
- * All recommendations under the comprehensive trail strategy, including identifying the need for new trails, connecting existing trails and facilitation of trail improvements/safety measures.

The above prescriptions particularly if designed to close current goal and objective gaps as much as possible will provide incredible benefits to the project area's flora, fauna and users. Sustainable, active forest management perpetuates diverse, healthy, and climate resilient landscapes. We look forward to continuing to work with the Rochester Ranger District, USFS and conservation partners on issues surrounding forest and habitat management, wildlife and access, and we welcome any questions you may have regarding our

position on this or similar projects.