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Comments: Comments are attached. Thank you for the opportunity to provide comment on this project.

The Vermont Fish and Wildlife Department (Department) has completed a preliminary review of the Green Mountain National Forest's (GMNF) Telephone Gap IRP scoping documents and offers the following comments in accordance with your Notice of Proposed Action and Opportunity to Comment period ending March 13, 2023. The Department appreciates the comprehensive nature of the scoping documents you provided as well as the detailed information that was presented by GMNF resource specialists at the February 21, 2023, public meeting. We further appreciate our professional partnership with the GMNF and will look forward to working together as this exciting project moves toward its design and implementation phases.

Forest Blocks and Connectivity

* Most of the Telephone Gap IRP area is within a 77,000-acre habitat block. This habitat block is the fifth largest in Vermont, out of a total of 4,055 habitat blocks greater than 20 acres identified by the Department. The Vermont Conservation Design identifies this block as both a Highest Priority Interior Forest Block and a Highest Priority Connectivity Block. We note and appreciate that the GMNF plays a critical role in the conservation and stewardship of this critical habitat block, and we ask that the GMNF consider these interior forest and connectivity functions when reviewing potential actions.

* We note and appreciate that the IRP proposes no new permanent system road construction.

Natural Communities

* We appreciate the GMNF's incorporation of the Department's Natural Heritage Inventory data. We support the proposal to preserve black ash in state-significant Hemlock-Balsam Fir-Black Ash Seepage Swamps by treating the trees against emerald ash borer.

* Although we fully recognize the need for enhancing forest resilience to a changing climate and commend the GMNF on its attention to this important objective, we have concerns about the proposed climate adaptation tree plantings. Such plantings should be evaluated for their potential to: introduce non-native genotypes (i.e., not from local provenance); introduce other non-native species, such as non-native mycorrhizal fungi; and alter state-significant natural communities. Furthermore, to the extent that these proposed plantings constitute Assisted Migration, the Department has concerns about these planting projects being situated in a large habitat block where self-adaptation is more likely to occur rather than in the least remote, more impacted settings which will likely have less natural resilience to the predicted climatic changes. We recommend that GMNF consult and consider ANR's Assisted Migration Guidelines (attached) in the planning and implementation of any such work.

* We strongly oppose the planting of tulip poplar (*Liriodendron tulipifera*), as this species is very rare in Vermont and legally protected as state endangered. The introduction of tulip poplar of unknown provenance into natural settings would alter the composition of the natural community, likely introduce a non-local genotype, and

confound our efforts to find and protect naturally occurring individuals of this listed species.

* We suggest that the red oak enhancement actions be evaluated in the context of the current natural community types present.

* We support the decision for no management activities within The Cape Research Natural Area, Blue Ridge Fen Candidate Research Natural Area, and North Pond Ecological Special Feature. All three areas include high-quality, state-significant natural communities.

Old and Young Forests

* Department staff have worked collaboratively with GMNF to identify old forests meeting the definition used in Vermont Conservation Design. We greatly appreciate this collaboration. We are supportive of the proposal not to harvest in areas identified by the Department's Natural Heritage Inventory as state-significant old forest natural communities, given the current context where structurally complex old forests are rare on the landscape. We also reiterate our support to assist with the further review of the 78 acres identified as needing additional inventory.

* We support the proposal not to include timber harvest or other management activities in any old growth forest, including the outstanding example found in The Cape Research Natural Area.

* We support the proposal to create more young forest within the project area, as this habitat is lacking and will benefit many species. Vermont Conservation Design identifies a need for additional young forest in the Southern Green Mountains biophysical regions. The Department would value the opportunity to work with GMNF staff to better understand how the overall desired age class distribution goals for the IRP (Table A-1 in the Notice of Proposed Action [ndash] Detailed Version) relate to the old and young forest targets in Vermont Conservation Design.

Bats

* Acoustic surveys for bats have been a well-established tool for determining whether federally protected, proposed, or candidate bat species are present on the forest prior to planned harvests or other tree cutting activities (i.e., for temporary road construction or vista creation and maintenance) that would take place when bats are active on the landscape (April through October). We suggest that these surveys continue as a way of both avoiding direct take of federally endangered bats, and to gather ongoing distribution data for these species as part of population monitoring and recovery efforts.

* We ask that the GMNF continue to work with us to protect the forested habitat around known bat hibernation sites and in accordance with USFWS protections under the federal Endangered Species Act.

* We ask that the GMNF continue to allow the Department to access bat hibernation sites on or through GMNF lands to monitor populations of bats and work toward their recovery.

* Snags, cavity trees, and trees with bark peeling in a roof-like fashion are important habitat features for bats who roost in trees, including the federally endangered Indiana and northern long-eared bats. Forest management activities should include retention of a selection of these trees, especially those with the largest diameter at breast height located within the forested area, as opposed to out in openings.

* If buildings on the GMNF are going to be demolished or if bats are found roosting in buildings/structures, all efforts should be made to avoid harming the bats and to follow the Vermont Fish and Wildlife Department's Best Management Practices for safely evicting bats from structures if needed.

* The tricolored bat is incorrectly identified as proposed for federal threatened status in the Proposed Action. The tricolored bat was proposed for federally endangered protection on September 13, 2022, by the USFWS.

* We ask that the GMNF evaluate impacts to state listed bat species as well, which are all identified as sensitive species in the Proposed Action, and to work with us on their protection and recovery.

General Wildlife

The Department fully acknowledges the importance of forest management for promoting the habitat needs of many wildlife species. In this regard, we are excited about the varied opportunities the Telephone Gap IRP presents for creating and enhancing habitat conditions within the National Forest. The following list details specific habitat features and recommendations that GMNF should consider and promote in its planning and implementation of the IRP.

* Retain concentrations of mature American beech trees with documented use by bears. Use can be identified through claw scars on tree trunks, clusters of broken branches in the canopy and/or on the ground, and disturbed leaf litter and bear scats in the fall when beechnuts are available. Bear scarred beech and beech bark disease resistant and tolerant trees should be prioritized for retention. Please consult with the Department if these features are identified within proposed harvest areas.

* Retain concentrations of mature oak, black cherry, and hickory trees. Please consult with the Department if these features are identified within proposed harvest areas.

* Retain cavity trees, snags, down logs, and woody debris to maintain denning and foraging habitat.

* Maintain buffers around forested wetlands and wetlands that support diverse herbaceous plants and soft mast producing shrubs.

* Create buffers around concentrations of hard and soft mast producing species that limit human activity near these foraging sites.

* The Department supports GMNF's efforts to increase components of oak trees through selective timber harvests, prescribed burns, and tree planting subject to the comments provided above in "Natural Communities".

* The Department supports GMNF's efforts to increase young forest habitat subject to the comments provided above in "Old and Young Forests".

The Department supports GMNF's efforts to maintain important soft mast species such as apple trees and blueberry barrens which will directly benefit many wildlife species.