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Comments: See attached letter for my comments on the Preliminary EA for the Telephone Gap Integrated Resource Project.

Thank you for the opportunity to comment on the proposed Telephone Gap Integrated Resource Project (TGIRP) within the Green Mountain National Forest (GMNF). It should be noted that I provided scoping comments with my initial letter dated March 7, 2023. My concern and comments continue to be primarily focused on the proposal to construct a hut near South Pond.

Topic 1 - Lack of a proper level of NEPA analysis for a system of huts to be constructed on National Forest System lands. Cost recovery should be in place to analyze a requested Special Use Permit. Also the Velomont Trail alone needs Master Plan level NEPA analysis.

The Vermont Huts Association (VHA) goal to create a system of existing and future huts (1.2.8 Special Uses) that include locations on the Green Mountain National Forest, must be comprehensively analyzed, not accomplished through miscellaneous and scattered NEPA proposals.

It appears the inclusion of this hut proposal in this Integrated Resource Project proposal is solely in response to a special use permit application by the proponent. The VHA has clearly stated their intent to apply for special use permits to construct a series of huts across the National Forest. The South Pond hut proposal is part of a larger system under active discussion which would at a minimum also include Moosalamoo NRA and Little Pond in Stratton locations. In a public field trip last fall, District Ranger Chris Mattrick stated that a Master Plan is needed for all of these hut proposals and that was going to be undertaken by VHA. The fact that the South Pond hut was tossed into the NEPA analysis for Telephone Gap is solely based on the convenience of its geographic location being within that analysis area. This stand-alone hut analysis is very disingenuous, as it clearly avoids the required cumulative effects analysis required by NEPA that would occur under a comprehensive Master Plan. Construction of a hut that is to become part of a system or network of huts throughout the forest requires analysis of that entire system. Conducting a piece meal analysis fails to discuss and disclose the cumulative effects that such a hut system may enact. Forest recreation managers should be well aware that introduction of new facilities would have multiple effects (at a minimum) on existing wildlife, changes in visitor use patterns and seasons of use, and maintenance/enforcement requirements that will be an added burden to budgets.

None of this can be effectively analyzed without a comprehensive view of the total system or network that is being ultimately envisioned. NEPA requires cumulative effects analysis on an entire systematic proposal just to address those concerns. A parallel situation would be a ski area proposing to obtain a special use permit to build a ski area, and then the forest conducting NEPA analysis and approving one ski run at a time, over a number of years.

The list of public recreation related comments cited on page 11 did not include the need for a hut near South Pond. This confirms that the NEPA proposal is solely in response to a requested Special Use Permit. In the case of these kinds of proposals, the proponent almost always is required to pay for the NEPA analysis. Just because a group is considered a "partner" there should not be a sweetheart deal for taxpayers to pay for the NEPA analysis to issue a special use permit. As required by agency policy, cost recovery should be in effect for a Master Plan level analysis.

Topic 2 - Wildfire risk effects analysis page 32.

I disagree with the Effects Statement that human-caused fires are not associated with developed recreation facilities. The fact that an arson fire occurred at this exact location only six years ago should prove this point. Human caused fires occur where humans congregate, such as a developed recreation facility, whether due to discarded cigarettes, hot mufflers, campfires or arson to a building. A dispersed location in the woods that is not a destination attraction is much less likely for someone to visit and then incidentally start a fire. As an example, proposed operations would allow permitted use of the road for administrative purposes, which introduces the risk of unintended fire starts from vehicles.

Topic 3 - Current Forest Plan direction is clearly violated by the proposed action -

On page four of the draft EA, 1.2 Forest Plan Direction - states "Each resource gap is the basis used when considering the management activities needed to move the overall existing resource conditions closer to those desired by the Forest Plan across the forest landscape (USDA Forest Service 2021)".

The Desired Future Condition did accommodate existing developed recreation facilities as described here:

"Recreation facilities may be present and will complement the desired recreation opportunities. Trail systems will be present and new trails may be developed.

Summer ORV trail will be limited in scope as described in the Forest-wide Standards and Guidelines. Away from trails, evidence of, and interaction with, other users will be moderate to low. Recreation management will be towards the desired ROS class of Semi-primitive Motorized".

However, it should be noted that the existing cabin was burned down several years before the GMNF acquired the land, so there was no "existing recreation facility" when it became national forest. This proposal is not just restoring the existing condition by allowing the construction and operation of a new hut.

In addition, page 59 of the 2006 GMNF Forest Plan under Standards and Guidelines for Diverse Backcountry 6.2 states - "Recreation Standard: S-1: Construction of new developed recreational facilities shall be restricted to those needed for resource protection".

In my March 7, 2023 comment letter, I specifically brought this issue to your attention. I did not see this addressed within this preliminary EA or within the Modifications and Alternatives Considered document.

When the South Pond parcel of land was acquired by the Green Mountain National Forest it became allocated to the Diverse Backcountry Management Area as defined in the 2006 GMNF Land Management Plan. In order to remove the parcel from that allocation, there must be a Forest Plan Amendment issued. This current NEPA analysis is not proposing a Forest Plan Amendment and therefore the proposed actions violate Standards and Guideline that are in place. On page 99 under Table 3-41 acknowledge and disclose that the threshold for effects is that "Effects do not comply with Forest Plan direction for the Diverse Backcountry Management Area". This has the opposite effect of the above statement that "activities need to move the overall existing resource conditions closer to those desired by the Forest Plan".

Clearly this proposal to build and operate a new developed recreation facility under that Diverse Backcountry 6.2 allocation is not permitted by existing Forest Plan direction. Why it is being proposed without a Forest Plan Amendment is befuddling as that violates stated National Forest policy. Why would the agency sign such a decision?

The Effects Analysis on page 102 that tries to minimize impacts to the remote character states -

"In summary, although there would be an increased visitor presence from the use of the permitted hut and new

trail network, the overall effect associated with remote character in the South Pond area would be minimal. Recreation use would increase in the area but aside from a low to moderate use of trails throughout the seasons and small groups using the hut, the increase would not be considered an unacceptable effect to visitors seeking a remote backcountry experience."

The 2006 Forest Plan was the product of extensive public involvement and after multiple reviews, it was legally enacted. The provisions in place cannot be waived away in a later document that, without any proof cited, gives the opinion that "the increase would not be considered an unacceptable effect to visitors seeking a remote backcountry experience." This is not how you amend a Forest Plan when you decide to violate existing Standards and Guidelines.