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Comments: The Vermont Fish and Wildlife Department (Department) has completed a review of the Green Mountain National Forest's (GMNF) February, 2024 Telephone Gap Integrated Resource Project, Preliminary Environmental Assessment and related documents and offers the following comments in accordance with your public comment period ending April 8, 2024. The Department appreciates the thorough consideration given to the comments you received, and the comprehensive nature of the documents you provided in support of your assessment and the development of alternative actions. The Department was also appreciative of the detailed information that was presented by GMNF resource specialists at the March 20, 2024, public meeting. The Department would like to recognize GMNF's efforts to engage our staff over the past year to address many of the concerns we raised during initial public scoping of the project. Of particular note in this regard, the GMNF:

- * Worked with Department staff to complete acoustic bat surveys throughout the IRP focusing on areas occupied by and containing highly suitable habitat for threatened and endangered bat species,
- * Worked with Department staff to inventory old forest stands, resulting in the modification of several previously proposed harvest treatments to specifically avoid newly identified state-significant old forest areas,
- * Dropped tulip poplar from the previously proposed climate adaptation tree planting plans in response to the Department's concerns regarding this state-listed endangered species,
- * Consulted regional US Forest Service genetics staff to determine seed collection methodologies that safeguard the genetic diversity of Vermont's forest in accordance with the Agency of Natural Resources' Assisted Migration Guidelines,
- * Assessed the implications of its proposed actions on the Vermont Conservation Design identified highest priority interior forest block and highest priority connectivity block, and
- * Identified several design features and mitigation measures aimed at safeguarding/enhancing critical habitats for wildlife including snags, cavity trees, downed logs, woody debris, wetlands, mast stands, legacy trees, and bat roosting trees.

While the Department is largely satisfied that its concerns have been acknowledged and addressed, there remains several areas of concern where continued collaboration with our staff is warranted during the final design and implementation phase of this project. Specifically, we encourage the GMNF to:

- * Further consult with Department staff and the Assisted Migration Guidelines to refine the proposed climate adaptation tree plantings to maximize the benefits of this work while safeguarding the natural communities and natural processes inherent to this highest priority interior forest block,
- * Engage Department staff to assess potential impacts of proposed actions on state-significant Rich Northern Hardwood Forest natural communities in response to a concern which has surfaced since our previous review and comments,
- * Continue working with Department staff to conduct bat presence/probable absence surveys in locations where planned harvests and prescribed burns will take place and where suitable bat habitat is available within the threatened and endangered bat species' ranges, and
- * Engage Department staff in the identification and delineation of important wildlife mast feeding areas (i.e., concentrations of beech, oak, and black cherry) within the project area and implement deliberate management practices aimed at safeguarding these resources through the future such as via appropriate forest management treatments and adequate buffering from recreational activities.

Last, the Department would like to acknowledge that it finds alternative actions B, C and D acceptable and especially appreciates the novel approaches to the forest management practices proposed in alternative C. As

always, we value our professional partnership with the GMNF and look forward to working together as this exciting project moves toward its design and implementation phases.