

USDA Forest Service
ATTN: Brett Hillman
2538 Depot Street
Manchester Center, VT 05255

Re: Early Successional Habitat Creation Project #53629

Mr. Hillman:

Thank you for the opportunity to comment on the Early Successional Habitat Creation Project. I am generally supportive of adding diversity to the forest landscape, having enjoyed the recreational, scenic, and wildlife viewing opportunities in places where similar projects have been done. My comments below are based on more than two decades of exploring the Green Mountain National Forest on foot and on skis, and by car and bike. They focus on the southeastern portion of the Manchester District.

Both the Forest Plan and the South of Route 9 IRP Scoping Information report note an underrepresentation of softwood forests on the GMNF. Some stands in Stratton (particularly stand 20) and Searsburg (stand 41) contain what seem to be a fairly mature upland non-montane spruce-fir forest with a diverse canopy structure. It would seem undesirable to harvest or convert this underrepresented forest type to ESH and hardwoods, and perhaps these areas should be excluded from harvest.



Spruce forest, stand 41, Searsburg

The possibility of adding up to 30 miles of new permanent system roads is cause for concern at a time when both forest fragmentation and maintaining existing Forest Service infrastructure are major issues. To minimize these issues, if new roads are constructed, I am supportive of them only being OML 1 roads, closed to vehicle traffic, and support the statement in the Notice of Proposed Action that there will be no change in public motorized use.

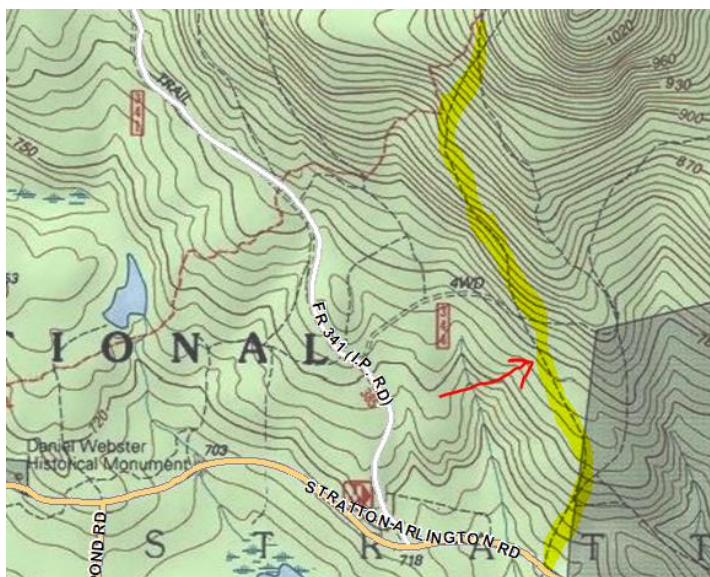
That being said, old roads provide valuable non-motorized access to the Forest. I use them frequently. My concern is that converting unclassified roads, existing roadbeds, and old temporary roads into new temporary and permanent roads significantly alters the character of these old roads, and the hydrology

of the landscape. If these old roads are upgraded, existing erosion problems should be fixed, but the roads and landscape should be modified to the least extent possible to minimize extensive ditching, water bars, and the resulting concentration of run-off and water quality issues. When drainage structures are removed and/or water bars constructed, please do so in a manner that doesn't significantly alter the roadbed and doesn't restrict ease of access on foot and skis. Consider leaving drainage structures in low gradient areas where risk of overtopping and outlet erosion is minimal. These comments would certainly apply to new road construction as well.

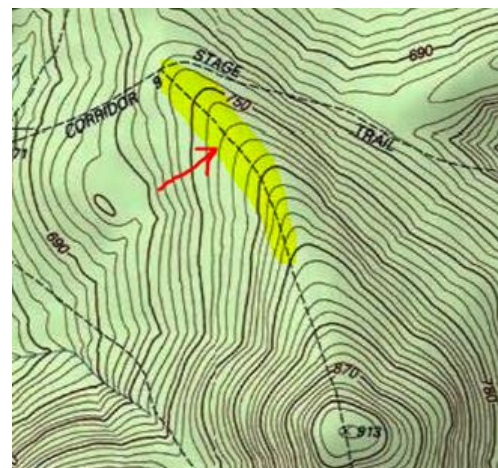


Existing unclassified road leading to stand 41 in Searsburg

The Notice of Proposed Action lists a number of design criteria for trails. I assume these are for system or designated trails only. There are several non-system trails which should be protected under these same design criteria. These non-system trails provide informal access to the Forest for recreationists and hunters, and an important backcountry experience different from that of designated trails. One such trail is the old Stratton Mountain Trail/Long Trail through stands 20, 21, and 25, from Stratton Arlington Road to the Long/Appalachian Trail. It is used by people to ascend Stratton Mountain. This historic route includes the site of the Webster Shelter and old insulator posts from the Stratton Mountain Fire Tower telephone line. Another trail is in Readsboro's stands 14 and 15; it runs from The Dome to the Old Stage Road (this may be a system trail, #393).



Old Stratton Mountain Trail



Readsboro Dome Trail

The view on Stratton Arlington Road in Stratton across the wetland in stand 20 or 21 north to Little Stratton Mountain is significant and unique. It's one of the few viewpoints on that popular road, and the only one where the mountain slopes are close by. It offers a sense of alpine wildness that, for example, the long distance view towards Glastenbury opposite FR 341 does not. The slopes of Little Stratton are also visible from Grout Pond and their nearby wetlands. The visual quality design criteria should be strictly applied in this viewshed.



Wetland with view from Stratton-Arlington Rd



Little Stratton Mtn from wetlands near Grout Pond

I do however feel that not all harvesting and log landings immediately adjacent to roads need to be screened from view. These areas offer a place to pull off the road, view the scenery and wildlife, and walk around. This is especially true for the disabled or mobility-challenged. Such opportunities, where appropriate, shouldn't be hidden from the forest visitor. I am supportive of interpretive signs at these locations.

There is an old homestead site in stand 41 in Searsburg (about a half mile west of Route 8) that should not be disturbed.

There may be some old legacy trees along the Old Stage Road/FR 266 in Readsboro. While any trees here certainly don't date from the road's 18th century origins, they certainly add to the character of this historic travel route, and should be maintained.

Thank you.

Sincerely,

Jeff Nugent, Brattleboro, VT