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Comments: I have concerns about the notion of buffer strips on this project. The 2006 Forest Plan (outdated) offers several different distances in its standards for riparian area protective strips, and that range of distances (50' - 110') still leaves room for exceptions and case-by-case judgment calls. This may work in a document and in an office environment, but this entire section of the plan is simply flawed (p.20, Table 2.3-1). What does it mean to say that: "a minor amount of soil disturbance is allowed in the protective strip...." ? Sometimes a natural berm allows disturbance inside the prescribed buffer distance? Are there requirements for that berm, and is it dependent on the nearby topography? Heavy equipment can operate in a protective strip when there is "sufficient snow to minimize soil disturbance"? Totally vague. I know plenty of people who get around in the woods, and they are skilled people, working professionals, but these standards carry virtually no meaning.

Yet another article informed me today that New England winters are getting warmer at a rapid pace. What does that mean on the ground? It means you better know what you're doing and where you're doing it, because south-facing slopes are going to soften up really fast. So not only do we have four consecutive spring / summers of extreme dry conditions, we now have highly variable winter weather patterns and an overall warming trend. This all adds up to simply not a good fit for heavy equipment. Part of the problem - as you know - is that the equipment needs to keep paying for itself or someone goes into serious debt. So the threat of debt and the daily requirement to assess soil conditions is no longer a reliably neutral situation. There's a pressure to get it done, because we figure we can always come in later and undo the damage. This is not the way to manage resources, and the problem begins with a poor set of standards.

This is partly why I argue that buffer strips during periods of drought should be doubled or even simply stretched outward to 200'. Since the winter of 2016, Vermont has experienced five spring and summer runs of extreme dry or drought conditions. The land needs to recover from that stress, and I suspect none of us knows the duration of that recovery period. A firm 200' buffer, with no allowances for spot judgments or in-the-moment interpretation, would protect the riparian areas during the stress of a drought and into their period of recovery. I do not see consistency at all when I look at buffer strips in various harvest areas, so this is a problem that needs immediate fixing.

Please give some attention as well to the buffering of the Cape Research Natural Area. I see no mention of buffers between this area and two adjacent timber stands scheduled for harvest activity. There is simply no way to preserve the integrity of a research area if logging occurs right up to its boundary. A functional buffer would need to maintain sunlight (or shading) conditions and offer a high degree of sound-proofing.

Thank you for the opportunity to comment.