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Comments: Thank you for the opportunity to comment.

Just last month, February, the Forest Service opened some 328 acres to commercial scale tapping by three different private ownerships around Lincoln, VT. The permit called for a "conservative" approach to the process, all of which is defined in a convenient guidebook: the North American Maple Syrup Producers Manual, 3rd, ed. This is appropriate and good, although there is not much real mention of what to do in drought conditions. As with all things related to government-owned land, enforcement is a big question mark.

The TGIRP proposes to open yet more land to tapping, again as the drought years continue. When does it end? And the conservative approach does not ban use of vacuum tubing. These sugaring operations are commercial / industrial in scale; there is profit involved and miles of plastic tubing. There is virtually NO connection to the romantic notions of maple sugaring - the cute family bringing in buckets of sap and boiling all night with a handful of neighbors. This is extraction, pure and simple; can someone explain to me how this is not a CAFO (Concentrated Animal Feeding Operation) model simply applied to our trees? Get Big or Get Out; and we wonder where all the support went for small farms. The trees don't even have names anymore.

Meanwhile, the vacuum system sucks out twice as much sap from trees as a gravity system would. Considering that trees are connected below ground and that so much depends on water availability, do we continue to push for ever-increasing syrup production? When do we stop, and how does that conversation happen? I would submit that a responsibly-run sugarbush displays good judgments by managers. Perhaps trees are tapped less frequently and perhaps profit is not the only driver.

I'm glad certain chemicals are banned, but I'm sure others are not. Is it acceptable to bleach the lines? I would insist that not a single shred of plastic be left on the landscape; it is a MAJOR concession to have the tubing system function as a permanent or even a seasonal feature. One of the Lincoln operations was a gravity-feed system, but is it allowed to convert over to vacuum at some future date? This is important because from what I see in the manual, one must allow a 30" drop line on vacuum systems, so theoretically a conversion effort would require thousands of drop lines to be replaced; that alone is another mile of plastic in the woods. Clearly this gets under my skin, because the only thing worse than old barbed wire in the woods is the piles of abandoned sugaring equipment: plastic tubing, couplings, spouts, spools of wire, and so forth.

I want to be clear that my criticism here is not targeted at any particular operation or individual. I simply cannot see any collective concern to focus on appropriately scaled businesses that support the regional food hub, and I see a total embrace of the industrial CAFO approach. Maximize production each and every year and leave future generations with a dysfunctional mess. Group hypocrisy, pure and simple.

Finally, I do think that within the 83 acres proposed for the TGIRP, it is completely reasonable to set up a rotation system so that some areas are left fallow in any given year. Farmers know to do this; it's part of crop rotation. USDA (working with the world of agriculture) should understand this basic concept as well. A sugarmaker putting together a functional rotation plan would require some real connection to the landscape, on top of just knowing where to string the branch and main lines. It would be priceless to share that wisdom annually with the USDA inspector.