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Organization:

Title:

Comments: 2024 04 Telephone Gap

My comment is focused on compartment 110, stands #4, #20, #3 & #12. Much of this area is in what you call Pittenden, an Inventoried Roadless Area. These stands are very near the Cape NRA; they might be about the NRA, I couldn't be certain from your maps because most of them don't show the NRA.

The Cape NRA/candidate NRA is the largest and one of the best examples of old growth forest in Vermont, old growth defined as untouched for 150 years. I understand that the Telephone Gap IRP isn't touching this NRA, however commercial thinning is proposed for the four nearby stands I mentioned above. The ages of these stands are: #4=1904, #20=1899, and both #1 & #12 = 1968. Stands #4 and #20 are especially important because they are quite old/mature. I realize that decisions about possibly expanding the NRA are not made by the Forest Service. However, decisions made by the Forest Service will impact future decisions by whomever has this authority. For instance, if stands #4 and #20 are cut, expanding the NRA to include these areas will be much less attractive.

The reason that it would be wise to expand the Cape NRA is explained in a 2001-2002 proposal from the Vermont Wilderness Association. Here is a paragraph from that proposal:

"A well-established biological principle holds that larger patches of old-growth forest are better than smaller stands. Research indicates that old-growth areas must be at least 500 to 1,000 acres in size in order to have a sufficient interior area-to-edge ratio, which provides the habitat conditions required by old-growth dependent species. The current designation of 290 acres is insufficient to protect its rare and priceless qualities."

To repeat, I know that the Forest Service doesn't make decisions about the NRA, but you are making decisions about possibly cutting near the NRA, which impacts this precious resource. I believe you should keep future options open by leaving the nearby stands mentioned above uncut, especially #4 and #20.

Another concern about cutting in compartment 110 is the 7 miles of dirt road between the log landings and pavement in North Chittenden/Holden. The likelihood of this road not freezing in the winter is high and increasing every year. Log trucks are going to have a hard time hauling out this harvest without damaging the road.

Therefore, for the two above reasons-protecting the Cape NRA and the 7 miles of dirt on FS 57 (also called Furnace Brook Trail/Road, and River Rd), I hope you will choose Alternative D, which will significantly reduce or eliminate these two concerns.

Thank you for all your work on this project and professional expertise.

Sincerely,

Nancy Gaudreau

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