June 8, 2018

Brett Hillman
Wildlife Biologist
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Green Mountain National Forest
2538 Depot Street
Manchester Center, VT 05255

Dear Brett,

Please accept the following comments from Vermont Natural Resources Council and Audubon Vermont on the proposed Early Successional Habitat Creation Project (ESHC Project) on the Green Mountain National Forest, Manchester Ranger District.

Our organizations recognize the importance of a landscape that contains a mix of age classes and forest conditions, including early-successional habitat (ESH) to achieve bird and wildlife habitat objectives. Keeping this in mind, we would like to offer some questions and concerns about the proposed action, which we outline below.

The proposed action calls for the potential harvesting of up to 17,411 acres and the construction of 45 to 75 miles of new roads (including potentially 30 miles of permanent roads) over a 15-year period. In our opinion, it seems hard to believe that the proposed project would lead to a finding of no significant impact. We believe this project should require an EIS with a range of alternatives that examine different approaches to harvest and road building levels to meet project objectives.

Young Forest Targets:

In general, we understand that the proposed project strives to address the lack of forested stands within the 0 to 9 age class, but it would be helpful to understand the existing condition (percent) of both the Manchester Ranger District and the entire Green Mountain National Forest to understand the overall context of whether Forest Plan objectives are being met, or are falling short, forest wide.

On gage 7, Table 1 – Forest plan objectives call for 5-20% forest stands in 0-9 year age class. The proposed 17,411 acres of ESH equals about 7% of the entire southern GMNF section. Audubon VT suggests that 3-5% of the landscape should be managed in this condition at any time. According to Vermont Conservation Design by the Vermont Agency of Natural Resources,

in order to maintain an ecologically functional landscape, "a return to the pre-European abundance of young forest (approximately 3-5% of the forest) is needed to reverse a declining trend and reach a level that at one time supported all of Vermont's native species that require young forest." (See p. 24 of Vermont Conservation Design). Although we understand that there is a desire to boost ESH in southern Vermont, we question whether there is an ecological justification for managing at the proposed level, and we believe there should be a range of alternatives considered, including an alternative that falls in line within the historic levels of young forests for wildlife species. We also believe changing climate natural disturbance events are likely to increase the amount of ESH, and project planning should recognize climate change as a variable for consideration, and factor this into the analysis.

Wildlife Species Considerations:

On page 8, first paragraph – there is reference to golden-winged warbler as a benefitting species. This species would not utilize the ESH created in the Green Mountain National Forest. The only current population in Vermont is in the Champlain Valley. In Vermont, it is a shrubland species and does not respond to ESH created through timber harvesting in the GMNF.

Harvesting Considerations:

We were not able to understand the proposed size of the openings that are suggested for the proposed harvest methods. Table 3 on page 9 discloses the maximum temporary opening sizes, but more information should be provided regarding the target size and range for each method. We believe harvesting should mimic natural ecological disturbances, and thus should be scaled at this level, versus larger openings.

Table 1 discloses that aspen is within the forest plan objective range. We question how much aspen regeneration is needed. In addition, while too much downed woody material can create too much shading for aspen regeneration, we do not believe it is necessary to conduct whole tree harvesting in order to achieve aspen regeneration, and it is important to recognize that downed woody material is part of a desired habitat condition.

We would like to see specific coarse woody debris material targets to maintain soil productivity. The design criteria suggest scattering tops and limbs. The Forest Guild provides suggested targets, and more specificity is needed for the proposed harvests (see http://www.forestguild.org/publications/research/2010/FG_Biomass_Guidelines_NE.pdf.)

Road Development:

As stated above, we are very concerned about the amount of proposed road development as part of this project, including the development of up to 30 miles of permanent roads, which will result in negative impacts to the forest, including potential water quality impacts. We believe the Forest Service should develop a range of alternatives that minimize road development. The design criteria explains that no more than 20 percent of each Inventoried Roadless Area shall be harvested with even-aged regeneration harvests in any ten-year period. How will the harvesting take place in IRAs? Will roads be built in Inventoried Roadless Areas?

Invasive and Non-Native Plants:

We are concerned over the likely introduction of non-native and invasive plants into harvest areas. We would like to see analysis about the impacts of invasive plant introduction and protocols for post treatment monitoring.

Wetlands and Riparian Areas:

On page 14, Wetland Habitat Enhancement – the proposal calls for dropping and leaving trees right up to water's edge to "simulate natural windthrow". Why not allow this to happen naturally? Natural disturbance events will continue to increase in scale and frequency due to climate change. Planning should recognize climate change as a natural agent for achieving some of the objectives.

Finally, we did not see any reference to riparian buffers. We suggest that riparian buffers be implemented along streams and rivers, such as a 100' riparian buffer where there would be minimal harvesting.

Thank you for the opportunity to comment on the proposed action. We will withhold judgment on the proposed project until we are able to review the environmental assessment. Please keep us informed as this project moves through the NEPA process.

Best,

Jamey Fidel, Forest and Wildlife Program Director, General Counsel
Vermont Natural Resources Council

Steve Hagenbuch, Conservation Biologist
Audubon Vermont