

**Response to Public Input - Proposed Monitoring Question Changes
May 2026**

Comment Source	Comment Input - Suggested Modification (red font)	Forest	Associated Monitoring Item Name: Management Question or Monitoring Element	Associated Detailed Monitoring Question	Consideration/Response	Accepted Modification (red font)
Standing Trees	<p>Detailed monitoring question: What proportion are ecological types on the Forest represented within the ecological reference area network? How much old-growth and late successional forest is found across the Forest?</p> <p>Measurement Indicator(s): Proportion of each ecological type on the Forest that occurs within the reference area network.</p> <p>Acreeage of old-growth forest inventoried across the Forest according to Forest Plan and Region 9 definitions.</p>	GMNF/ FLNF	Ecological Type Mapping and Representation: How well do Forest Plan components maintain or restore ecological processes and systems within desired ranges of variability?	What proportion are ecological types on the Forest represented within the ecological reference area network?	<p>The suggested changes are not accepted.</p> <p>The suggested addition to the detailed monitoring question and measurement indicator associated with old-growth and late successional forest is not directly tied to a Forest Plan component. The Forest Plan component [Goal 6 and associated objective for Green Mountain National Forest (GMNF), and Goal 5 and associated objective for Finger Lakes National Forest (FLNF)] refer to ecological types rather than forest conditions. The existing monitoring question is designed to provide what proportion of ecological types are passively managed. Although the suggested addition is not accepted, Forest Service staff will continue to work toward better defining old growth for GMNF and FLNF in collaboration with VT Agency of Natural Resources, NY state agencies, academia, and non-government organization partners.</p>	No change
Standing Trees	<p>Detailed monitoring question: To what extent are management activities altering or impacting maintaining-or-restoring watershed functions?</p>	GMNF/ FLNF	Element 1: Status of select watershed conditions.	To what extent are management activities maintaining or restoring watershed functions?	<p>The suggested change is not accepted.</p> <p>There is no need to replace "maintaining or restoring" with "altering or impacting" because the change would not affect the information that will be considered, the results that will be reported, or the degree to which the question allows the success of implementing the Forest Plan to be assessed.</p>	No change
Standing Trees	<p>Detailed monitoring question: To what extent are management activities and natural processes leading to increased altering structural diversity within forested stands and across forested landscapes, including, for landscape scale analysis, nearby land not managed by the Forest Service? moving areas toward desired objectives identified under Goal 2 of the Forest Plan? How are natural processes and management actions affecting above- and below-ground forest carbon accumulation across the Forest?</p> <p>Measurement Indicator(s): 1) Number of acres and proportion of each forest type in each age class, measured at as fine a spatial scale as possible, at minimum at a scale fine enough to capture most natural disturbances, which occur over areas less than one quarter acre in size. 2) Number of acres, and proportion of harvest acres treated with uneven-aged management, and size (acreage) of each disturbance created with this type of management. 3) Number of acres treated explicitly to enhance early successional characteristics, and size (acreage) of each disturbance created with this type of management. 4) Number of acres treated explicitly to enhance late successional characteristics, and description and size (acreage) of each disturbance created with this type of management. 5) Number of acres treated with various methods to explicitly enhance the health, longevity, and/or structural diversity of forested stands at the stand and landscape scales, and description and size (acreage) of each disturbance created with this type of management. 6) Total above- and below-ground carbon storage across the Forest, the rate of change in carbon storage, and the effects of logging, prescribed fire, and other management activities on carbon accumulation at the specific sites where these management actions take place.</p>	GMNF/ FLNF	Element 2: Status of select ecological conditions including key characteristics of terrestrial and aquatic ecosystems.	To what extent are management activities and natural processes leading to increased structural diversity within forested stands and across forested landscapes, moving areas toward desired objectives identified under Goal 2 of the Forest Plan?	<p>The suggested changes are not accepted.</p> <p>There is no need to change "increased" to "altering" for the detailed monitoring question because it does not provide a meaningful difference to inform how well management activities are achieving Goal 2 and objectives which is to maintain and restore quality, amount, and distribution of habitat by providing more composition and structure diversity.</p> <p>There is no need to add consideration of land not managed by the Forest Service to the detailed monitoring question because it is not tied to any Forest Plan component and monitoring non-National Forest System lands is not part of the monitoring program.</p> <p>There is no need to further define measurement scale as an indicator since the acres will be measured to as fine a scale as possible with available data and as necessary to adequately address the question.</p> <p>There is no need to add consideration of carbon sequestration and storage to the detailed monitoring question and as indicator #6 because it is not relevant to Forest Plan components (Goal 2 for both GMNF and FLNF, and Goal 5 and 6 for FLNF and GMNF, respectively).</p> <p>There is no need to add the size (acreage) and description of disturbance to management indicator #s 2 to 5 since this will inherently be included in the response for each indicator.</p>	No change
VT Natural Resources Council	<p>Add measurement indicator #6 to provide a benchmark for understanding how natural processes are leading to increased structural diversity within forested stands and across forested landscapes.</p> <p>Measurement Indicator(s): 1) Number of acres and proportion of each forest type in each age class. 2) Number of acres and proportion of harvest acres treated with uneven-aged management. 3) Number of acres treated explicitly to enhance early successional characteristics. 4) Number of acres treated explicitly to enhance late successional characteristics. 5) Number of acres treated with various methods to explicitly enhance the health, longevity, and/or structural diversity of forested stands at the stand and landscape scales. 6) Number of acres where natural processes are enhancing structural diversity.</p>	GMNF/ FLNF	Element 2: Status of select ecological conditions including key characteristics of terrestrial and aquatic ecosystems.	To what extent are management activities and natural processes leading to increased structural diversity within forested stands and across forested landscapes, moving areas toward desired objectives identified under Goal 2 of the Forest Plan?	<p>The suggested change is not accepted.</p> <p>It is understood that natural processes are working in the background across the Forest. These processes can work to increase, decrease or maintain structural diversity in managed and unmanaged stands across the Forest and across multiple scales. Increasing our understanding of these processes is valuable, but it is not practical to measure for the entire Forest and adequate data is not available to meaningfully address this question. Research and scientific advancements in our understanding of natural processes on the landscape will provide additional context to monitoring using the proposed measurement indicators.</p>	No change
Standing Trees	<p>Detailed monitoring question: To what extent are management activities altering or impacting conserving-or-improving water quality?</p>	GMNF/ FLNF	Element 2: Status of select ecological conditions including key characteristics of terrestrial and aquatic ecosystems.	To what extent are management activities conserving or improving water quality?	<p>The suggested change is not accepted.</p> <p>There is no need to replace "maintaining or restoring" with "altering or impacting" because the change would not affect the information that will be considered, the results that will be reported, or the degree to which the question allows the success of implementing the Forest Plan to be assessed.</p>	No change
Standing Trees	<p>Detailed monitoring question: What are the population trends for sensitive plants? To what extent are management activities sustaining-or-enhancing altering populations and habitat conditions for sensitive plant populations?</p>	GMNF/ FLNF	Element 4: The status of a select set of the ecological conditions required under § 219.9 to contribute to the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain a viable population of each species of conservation concern.	<p>What are the population trends for sensitive plants?</p> <p>To what extent are management activities sustaining or enhancing habitat conditions for sensitive plant populations?</p>	<p>The suggested change is partially accepted.</p> <p>Rather than accepting the suggested replacement of "sustaining or enhancing" with "altering populations..." to the detailed monitoring question, replacing this wording with "affecting" makes for a more neutral question. The analysis and reporting will remain the same.</p> <p>The Forest Service always assesses and reports sensitive plant population trends including whether they are increasing, stable or declining. This has been added to the detailed monitoring question for clarification.</p>	<p>Detailed monitoring question: What are the population trends for sensitive plants (increasing, decreasing, or stable)? To what extent are management activities affecting conditions for sensitive plant populations?</p>

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Bald	<p>Element 5 addresses recreation and the visitor experience, but how do you measure the experience of people who seek recreational experiences that involve getting away from people and noise and the more aggressive forms of recreation? Trail users are only a portion of the total users of the forest; I submit that there is little energy directed toward people who want to disengage and simply experience simple, basic activities. Outing clubs may offer some information, but they also filter out those who are not members. Recreation monitoring should be comprehensive in nature to achieve social justice goals and offer an appropriately balanced perspective.</p>	GMNF/FLNF Element 5: The status of visitor use, visitor satisfaction, and progress toward meeting recreation objectives.	To what extent are management activities providing high quality recreation services that meet the expectations of the public?	<p>The suggested changes are not accepted.</p> <p>This element is monitored through National Visitor Use Monitoring survey protocol. Descriptive information for wilderness and dispersed visitor use include activity participation, demographics, visit duration, measures of satisfaction, and trip spending connected to the visit.</p> <p>There is a separate monitoring question that addresses trail management: "Management Question - Is the quality of the Forest Service trail system being improved through operation and maintenance?" Detailed Monitoring Question - How many miles of trail are maintained annually and how many trail miles are meeting standard?."</p>	No change
Standing Trees	<p>Detailed monitoring question: Within site plots-how How are soil/site quality and productivity changing over the long term, in response to factors such as acid deposition, climate change, invasive species, and other environmental problems? How are management activities mitigating or exacerbating changes related to climate change or other stressors?</p> <p>Measurement Indicator(s): Within site plots established in wilderness areas, and plots to be established in areas affected by logging, roadbuilding, and other 'active' management, measure changes over time for: 1) Soil quality - Soil nutrient levels and toxins by major horizon. 2) Soil productivity - Forest Health 3) Soil climate - Soil temperature and moisture, depth of freezing, correlated with selected meteorological parameters. 4) Soil Organic Matter/Total Soil Carbon</p>	GMNF/FLNF Element 6: Measurable changes on the plan area related to climate change and other stressors that may be affecting the plan area.	<p>Within site plots how are soil/site quality and productivity changing over the long term, in response to factors such as acid deposition, climate change, invasive species, and other environmental problems?</p> <p>More specifically: 1) Are soil nutrient levels changing, and are the changes affecting soil/site productivity? 2) What toxins exist in the soil (e.g. from the atmosphere), and how are they changing in quantity and type over time? Is this affecting productivity?</p>	<p>The suggested changes are partially accepted.</p> <p>There is no need to delete "within site plots" from the detailed monitoring question because monitoring will occur in specific sites where data is collected and analyzed.</p> <p>The suggested addition of another detailed monitoring question "How are management activities mitigating or exacerbating changes related to climate change or other stressors?" is accepted but modified to "How are management activities potentially mitigating or exacerbating changes in soils?"</p> <p>There is no need to add "...and plots to be established in areas affected by logging, roadbuilding, and other 'active' management" to the measurement indicator because it would not be possible to implement with current or anticipated staffing capacity. The Forest Service Soil Disturbance Monitoring Protocol sampling data collected for Element 6 monitoring question: "To what extent are management activities impacting soil quality and productivity?" can be used to compare effects from management activities compared to long-term monitoring as a background baseline.</p> <p>The suggestion to add measurement indicator #4 Soil Organic Matter/Total Soil Carbon" is accepted but will be incorporated into measurement indicator #1.</p>	<p>Detailed monitoring question: How are management activities potentially mitigating or exacerbating changes in soils?</p> <p>Measurement indicator(s): 1) Soil quality - Soil nutrient levels, soil organic matter, total soil carbon, and toxins by major horizon.</p>
Standing Trees	<p>Detailed monitoring question: To what extent are destructive insects and disease organisms impacting healthy forest conditions beyond ranges of historic natural disturbance, and in comparison to logging, prescribed fire, and other human-caused disturbances?</p> <p>Measurement Indicator(s): Insect or disease infestations. 1) Number of outbreaks by species. 2) Acres affected by species. 3) Quantification of impacts from such outbreaks - percent mortality, persistence and spread of the outbreak.</p>	GMNF/FLNF Element 6: Measurable changes on the plan area related to climate change and other stressors that may be affecting the plan area.	To what extent are destructive insects and disease organisms impacting healthy forest conditions?	<p>The suggested changes are partially accepted.</p> <p>The suggested deletions of "destructive" and "healthy" in the detailed monitoring question are accepted.</p> <p>The suggested additional "beyond ranges of historic natural disturbance, and in comparison to logging, prescribed fire, and other human-caused disturbances" to the detailed monitoring question is not accepted. This additional information is not practical to collect and not necessary to assess resource trends relevant to Forest Plan components. The question is only intended to assess and measure forestwide resource trends from insects and disease, and not from management activities to implement the Forest Plan.</p> <p>The suggested addition of measurement indicator #3 is partially accepted. Qualitative trends can be determined from monitoring data collected, however, the data will not provide the level of detail needed for reliable quantification.</p>	<p>Detailed monitoring question: To what extent are insects and disease organisms impacting forest conditions?</p> <p>Measurement Indicator(s): Insect or disease infestations. 3) Trends in outbreak persistence, spread, and associated tree mortality</p>
Bald	<p>Element 6 attempts to outline monitoring goals for invasive plant species, but the agency is working with an invasive plants Environmental Assessment document that is seriously outdated and getting more so every year. If the expired Forest Plan is accompanied by expired supporting documents, how is the public supposed to comment in a meaningful manner on this proposal? More troubling is that this proposal will be finalized, with gaps and flaws cemented in place, and then used to update Chapter 4 of the Forest Plan? I see self-inflicted, intentional dis- connects here. Not all breaks and disruptions are "manmade". Tropical Storm Irene altered a lot of conditions in the forest as a naturally occurring event. I may as well note that the expired Forest Plan pre-dates all the impacts, known or unknown, brought about by Tropical Storm Irene. The Plan and the EA and this monitoring program proposal should all be updated with tighter coordination. If that is not financially possible, then we have a real problem moving forward. We should not be actively managing a dynamic system if we are restricted or short-changed or incapacitated with regard to monitoring.</p>	GMNF/FLNF Element 6: Measurable changes on the plan area related to climate change and other stressors that may be affecting the plan area.	To what extent are destructive insects and disease organisms impacting healthy forest conditions?	<p>The proposed changes to monitoring questions are intended to reflect a renewed consideration of each resource included in Forest Plan components (goals, objectives, desired future conditions, and Forestwide and Management Area standards and guidelines). Current and accepted monitoring methodology is based on scientifically sound information.</p> <p>The revision of the Forest Plan is not anticipated in the near future due to lack of funding which is appropriated by Congress for this purpose. Until funding is secured to complete the revision process, the Forest Plan can be amended to reflect changed resource conditions and ineffective management direction. One of the primary purposes of the monitoring program is to identify potential changes to Forest Plan components through the amendment process to ensure management direction remains relevant and scientifically valid.</p>	No change
Bald	<p>Remaining on Element 6. I again see incredible latitude granted to the agency and agenda-driven partners to find effectiveness in treatment efforts when perhaps the success rate was not so strong. Assessing immediate results is an odd approach, and again the door is left open for the agency to choose its own sites later for long-term assessments. Scientific integrity is again at risk.</p>	GMNF/FLNF Element 6: Measurable changes on the plan area related to climate change and other stressors that may be affecting the plan area.	To what extent are destructive insects and disease organisms impacting healthy forest conditions?	Forest Service resource specialists provide objective information based on their respective monitoring data and professional expertise.	No change
Bald	<p>Element 6 calls for monitoring of treatment effectiveness for management of invasive plant species. Again, a conflict of interest exists if, and especially if, the people doing the assessments are the same as the people doing the treatments. I know you give little credence to my concerns about invasive species, per your response on other forest projects, but here is the evidence I can put in front of you. This state has county foresters and university "thought leaders" who routinely declare that chemical treatment programs are the only economical way to manage populations of "species X." I see this over and over; you can look up a document published on Cornell University letterhead in 2018 (Joseph Neal and Andrew Senesac). Page 1 declares straight up that nothing is cheaper than glyphosate. End of discussion, and any knowledge contrary to that declaration simply cannot be allowed. Case closed. So I ask: "How do we move beyond that mindset?" How do we guarantee the integrity of the evaluations?</p>	GMNF/FLNF Element 6: Measurable changes on the plan area related to climate change and other stressors that may be affecting the plan area.	To what extent are destructive insects and disease organisms impacting healthy forest conditions?	Forest Service resource specialists provide objective information based on their respective monitoring data and professional expertise.	No change

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Standing Trees	<p>Detailed monitoring question: To what extent are management activities impacting soil quality, carbon storage, nutrient status, and productivity?</p> <p>Measurement Indicator(s): Within the Forest Service Soil Disturbance Monitoring Protocol sampling and monitoring areas affected by recent logging, roadbuilding, prescribed fire, and other management activities, what is the: 1) Amount of forest floor impacted 2) Amount of topsoil displacement 3) Severity of rutted, burned or compacted soil 4) Severity of plat/massive soil structures, or puddled soil 5) Impacts to soil organic matter and total soil carbon (measured before and after management activities) 6) Impacts to soil nutrient status (levels of Nitrogen, Phosphorus, calcium, potassium, magnesium, and other nutrients, measured before and after management activities)</p>	GMNF/FLNF (Element 8: The effects of each management system to determine that they do not substantially and permanently impair the productivity of the land.	To what extent are management activities impacting soil quality and productivity?	<p>The suggested changes are partially accepted.</p> <p>It is not possible to add "carbon storage and nutrient status" to the detailed monitoring question or add measurement indicators #5 and #6 associated with soil organic matter and nutrient status, because we do not have the means (laboratory equipment or funding) to accurately ascertain these soil properties.</p> <p>The suggestion to delete "Forest Service Soil Disturbance Monitoring Protocol sampling and monitoring" from measurement indicators can't be accepted because the protocol outlines a framework for adequately monitoring soil disturbances from forest management pre- and post-activity.</p> <p>The suggestion to add "...logging, road building, prescribed fire and other management activities" to measurement indicators is partially accepted. The monitoring protocol is not designed to monitor all the suggested items, but can be expanded to include soil monitoring of other management activities on the forest.</p>	Measurement Indicator(s): Within the Forest Service Soil Disturbance Monitoring Protocol sampling and monitoring areas including select areas where timber harvest, prescribed fire, and other management activities have been implemented , what is the:
Standing Trees	<p>Detailed monitoring question: To what extent are management activities conserving, se improving, or negatively impacting fisheries habitat? How do pesticide applications, timber harvest, roadbuilding and other management activities impact fisheries habitat parameters, including but not limited to, stream bottom morphology, changing flow patterns, water temperature and oxygenation, cobble size, sediment deposition, and riffle/pool locations?</p>	GMNF/FLNF Fish Habitat: How well do Forest Plan components conserve or improve fisheries habitat?	To what extent are management activities conserving or improving fisheries habitat?	<p>The suggested changes are not accepted.</p> <p>There is no need to add "or negatively impacting" to the detailed monitoring question or add another question "How do pesticide applications...?" because these suggestions do not alter the information that will be considered, the results that will be reported, or the degree to which the question allows the success of implementing the Forest Plan to be assessed.</p>	No change
Standing Trees	<p>Monitoring Item Name: Management Question Forest-wide Habitat Composition: To what extent are natural processes and management activities maintaining and restoring quality, amount, and distributions of habitats to desired levels?</p> <p>Measurement Indicator(s): 1) Number of acres and proportion in each type and of each age class, measured to as fine a spatial scale as possible. 2) Number of acres of treatments associated with habitat objectives, including: - To enhance softwood component or convert to mixedwood or softwood habitat. - To maintain, enhance, or restore oak habitat. - To maintain, enhance, or create aspen habitat. - To maintain, enhance, or create permanent or temporary upland opening habitat. - To maintain, enhance, or create old-growth characteristics.</p>	GMNF/FLNF Forest-wide Habitat Composition: To what extent are management activities maintaining and restoring quality, amount, and distributions of habitats to desired levels?	To what extent are management activities and natural processes moving forest composition and age classes toward Forest Plan objectives (Tables 2.2-1 and 2.2-2)?	<p>The suggested changes are not accepted.</p> <p>The suggested addition of "natural process" to the monitoring item name/management question is not needed because monitoring will inherently consider natural processes when addressing the detailed monitoring question "To what extent are management activities and natural processes moving forest composition and age classes toward Forest Plan objectives (Tables 2.2-1 and 2.2-2)?"</p> <p>There is no need to further define measurement scale for measurement indicator #1 since the indicator will be measured to as fine a scale as possible with available data and as necessary to adequately address the question.</p>	No change
Standing Trees	<p>Detailed monitoring question: To what extent have management activities reduced hazardous fuels? Do any identified hazardous fuels pose a threat to important human or ecological resources, and how does this compare to the potential benefits of said "fuels" as coarse woody debris or other ecological elements?</p>	GMNF/FLNF Hazardous Fuels: Are fuel treatment activities reducing fuel loads?	To what extent have management activities reduced hazardous fuels?	<p>The suggested change is not accepted.</p> <p>There is no need to add "Do any identified hazardous fuels pose a threat to important human or ecological resources..." to the detailed monitoring question. The intent of this monitoring question is to determine how well management activities are meeting Forest Plan Goal 21 and associated objectives (GMNF, and Forestwide Fire Management standards and guidelines (GMNF and FLNF). The tradeoffs of reducing hazardous fuels with ecological benefits of retaining them on the landscape are disclosed in the project specific environmental analysis applicable to each management activity.</p>	No change
Standing Trees	<p>Monitoring Item Name: Management Question Local and Regional Economies: To what extent have management activities affected supported regional and local economies?</p> <p>Detailed monitoring question: What is the range of dollar amounts and board feet in timber sale contracts? Who has been awarded the timber sale contract? What is a reasonable estimate of the monetary value of the change in ecosystem services related to timber harvests? What proportion of that cost is born by local communities?</p> <p>Measurement Indicator(s): 1) Number of timber sale contracts awarded for ranges of board feet and monetary values, and location of contractor. 2) Number of board feet processed at local mills. 3) Detailed estimate of the monetary value of changes to ecosystem service values (flood control, climate mitigation, recreation, etc) related to timber harvest, and proportion of that change born by local communities.</p>	GMNF Local and Regional Economies: To what extent have management activities supported regional and local economies?		<p>The suggested changes to the detailed monitoring question and measurement indicators are not accepted because they are not relative to Forest Plan Goal 17: "Support regional and local economies through resource use, production, and protection, and associated objectives".</p>	No change
Standing Trees	<p>Detailed monitoring question: Where are non-native invasive species located within the Forest, and to what extent are non-native invasive species impacting other Forest resources? Do monitoring data show any connections between management activities (e.g. logging, roadbuilding, mechanical control) and the extent of non-native invasive species?</p> <p>Measurement Indicator(s): Extent of infestations in habitats of concern across the Forest: 1) Percentage of sites infested, by resource area 2) Acres and/or sites infested, by resource area 3) Acres and/or sites treated, by resource area 4) Treatment effectiveness upon completion of treatment</p>	GMNF/FLNF Non-Native Invasive Species: How well do Forest Plan components prevent and control the spread of non-native invasive plants?	To what extent are non-native invasive species impacting other Forest resources?	<p>The suggested changes are not accepted.</p> <p>There is no need to add "Where are non-native invasive species located within the Forest" to the detailed monitoring question because it is too broad and could be interpreted multiple ways. The spatial database used for monitoring already tracks location and infestation details.</p> <p>There is no need to add "Do monitoring data show any connections between..." to the detailed monitoring question because the suggestion is beyond the scope of the monitoring program. Project areas are often monitored during routine site visits after implementation especially where known non-native invasive species are treated with mitigating measures. Additional control treatments are prescribed on a case by case basis depending on treatment efficacy.</p> <p>There is no need to replace "in habitats of concern" with "across the Forest" because it does not meaningfully improve evaluation of Forest Plan components. However, "by resource area" has been clarified with more detail what areas will be included for monitoring.</p>	Measurement Indicator(s): Extent of infestations in a) vicinity of Regional Forester Sensitive Species populations, b) wildlife openings and/or c) Ecological Special Areas/Research Natural Areas/Candidate Research Natural Areas: 1) Percentage of sites infested, within a), b) and c) 2) Acres and/or sites infested, within a), b) and c) 3) Acres and/or sites treated, within a), b) and c) 4) Control effectiveness upon completion of treatment

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Bald	I sought more information but was unable to access the reference you provided, Page not Found : "Data Recording Protocols and Requirements for Invasive Species Survey, Inventory, and Treatment" https://fsweb.wo.fs.fed.us/invasivespecies/data.shtml	GMNF FLNF	Non-native Invasive Species: How well do Forest Plan components prevent and control the spread of non-native invasive plants?	To what extent are non-native invasive species impacting other Forest resources?	The "Data Recording Protocols and Requirements for Invasive Species Survey, Inventory, and Treatment" document was erroneously referenced because it only consists of data recording protocols not designed as a "monitoring methodology" manual. The data recording protocols are unique to Forest Serviced databases and serves as a technical data entry/data recording document. The protocols are not biologically focused and are not related to biological monitoring of aquatic or terrestrial invasive species.	Best Available Scientific Information (BASI) References: n/a
Standing Trees	Measurement Indicator(s): 1) Acres of even-aged regeneration harvest annually and total for the decade. 2) Acres of even-aged intermediate harvest annually and total for the decade. 3) Acres of uneven-aged harvest annually and total for the decade. 4) MMBF volume of sawtimber, fuelwood and pulp offered and sold annually and total for the decade.	GMNF FLNF	Outputs Accomplished - Volume and Acres of Timber Offered and Sold: To what extent are management activities providing sustainable supply of forest products?	How do actual outputs compare to those projected in Appendix D, Proposed and Probable Practices, specifically related to timber offered and sold?	The suggested change is partially accepted. The suggested addition of "fuelwood" to measurement indicator #4 measurement is partially accepted because for the purposes of this monitoring question, "pulp" includes all non-sawtimber products including fuelwood.	Measurement Indicator(s): 4) MMBF volume of sawtimber and non-sawtimber products offered and sold annually and total for the decade.
Standing Trees	Monitoring Item Name: Management Question: Prescribed Fire: To what extent is prescribed fire benefiting resources used, and what are its impacts? Measurement Indicator(s): 1) Acres of desired habitat restored, negatively impacted , or maintained. 2) Acres where fire is reintroduced into historically fire adapted landscapes, evidence of this historic fire adaptation, and acreage where fire was introduced into landscapes without a discernible ecological history of fire.	GMNF FLNF	Prescribed Fire: To what extent is prescribed fire benefiting resources?	Is prescribed fire restoring and/or maintaining desired vegetation composition and structure?	The suggested changes are not accepted. There is no need to replace "...what extent is prescribed fire benefiting resources?" with "...what extent is prescribed fire used, and what are its impacts?" to the monitoring item name/management question, or change "Acres of desired habitat restored or maintained" to "Acres of habitat restored, negatively impacted, or maintained". The intent of this management question is to determine whether prescribed fire treatments are helping management activities meet Forest Plan direction associated with desired forest type composition, age, and structure by addressing the detailed monitoring question: "Is prescribed fire restoring and/or maintaining desired vegetation composition and structure?" Negative or adverse impacts from prescribed fire will inherently be considered as part of this monitoring question. There is no need to add "...evidence of this historic fire adaptation, and acreage where fire was introduced into landscapes without a discernible ecological history of fire" to measurement indicator #2. Although prescribed fire may be proposed to restore or maintain fire dependent ecosystems, its primary use is to restore or maintain habitat types alone or together with other silvicultural treatments. Whether burned areas are within historically fire adapted landscapes or where fire is not historically evident will inherently be considered as part of this monitoring question.	No change
Standing Trees	Detailed monitoring question: To what extent are rare and outstanding biological, ecological, or geological features being protected, maintained, enhanced, or threatened? Measurement Indicator(s): 1) Number and area of rare or outstanding natural area sites monitored. 2) Number of outstanding natural area sites for which condition was documented. 3) Condition of natural area sites, and whether and what kind of management was applied there.	GMNF FLNF	Rare or Outstanding Natural Areas: How well do Forest Plan components protect rare or outstanding biological, ecological, or geological areas?	To what extent are rare and outstanding biological, ecological, or geological features being protected, maintained, or enhanced?	The suggested changes are partially accepted. The suggested addition of "or threatened" to the detailed monitoring questions is accepted. There is no need to add "and area" to measurement indicator #1 or to add "Condition of natural..." as measurement indicator #3 because these changes do not meaningfully improve evaluation of Forest Plan components. The condition of natural area sites and any natural or human caused changes to that condition will already be ascertained with indicator #'s 1 and 2 as proposed.	Detailed monitoring question: To what extent are rare and outstanding biological, ecological, or geological features being protected, maintained, enhanced, or threatened?
Standing Trees	Monitoring Indicator(s): 1) What management activities protect or promote RFSS? 2) What monitoring of RFSS individuals, populations, and habitats has occurred? 3) What are the results of that monitoring? 4) Do RFSS conservation plans exist or are we moving toward creating plans? 5) If a plan exists, what actions are we taking to implement the plan?	GMNF	Sensitive Species: How well do Forest Plan components maintain and restore habitats to ensure population viability for native and desirable non-native species?	Are management activities ensuring the protection and promotion of Regional Forester Sensitive Species (RFSS) habitats and populations?	The suggested change is accepted. Although it is assumed monitoring information will be evaluated for conclusions and recommendations for tentative Forest Plan component or site specific design changes, adding "what are the results of that monitoring" as monitoring indicator #3 ensures this will be documented in monitoring and evaluation reports. The only exception will be sensitive species locations to protect them from intentional or unintentional impact.	Monitoring Indicator(s): 3) What are the results of that monitoring?
Standing Trees	Measurement Indicator(s): 1) Acres with percent stocked to minimal standards. 2) Species composition of areas following a timber harvest. 3) Identification of deer browse, erosion, and other factors that may affect restocking of harvested stands.	GMNF FLNF	Stocking Level: Are harvested lands adequately restocked according to National Forest Management Act requirements?	Are lands adequately restocked within five years of a regeneration harvest or site preparation activities?	The suggested changes are not accepted. There is no need to add suggested measurement indicators # 2 and #3 associated with species composition and factors that may affect restocking because this information will inherently be documented when determining whether harvested areas meet minimum stocking levels.	No change
Standing Trees	Detailed monitoring question: To what extent are management activities ensuring stream crossing structures allow desirable fish habitat and stream function conditions such as aquatic organism passage and passage of water and debris associated with high flows? How are management activities including logging and roadbuilding impacting water quality and stream morphology?	GMNF FLNF	Stream Function: How well do Forest Plan components provide desirable aquatic organism passage and stream function conditions?	To what extent are management activities ensuring stream crossing structures allow desirable fish habitat and stream function conditions such as aquatic organism passage and passage of water and debris associated with high flows?	The suggested change is not accepted. There is no need to add "How are management activities..." to the detailed monitoring question because the suggestion is duplicative of the following existing proposed monitoring questions: Existing required Element 1 detailed monitoring question "To what extent are management activities maintaining or restoring watershed functions?" includes indicators that account for the condition of both stream morphology and water quality. Existing required Element 2 detailed monitoring question "To what extent are management activities conserving or improving water quality?" more directly accounts for water quality concerns. Logging and road building, if occurring, would be management activities considered in answering these questions and their impacts on water quality and stream morphology would inform the results.	No change
Standing Trees	Monitoring Item Name: Management Question: TES Bats: To what extent are Forest Service management activities contributing toward population viability or decline for native and desired non-native species?	GMNF FLNF	TES Bats: To what extent are Forest Service management activities contributing toward population viability for native and desired non-native species?	Are threatened, endangered, and sensitive bat species continuing to persist on the landscape?	The suggested change is not accepted. There is no need to add "or decline" to the monitoring item name/management question. Population viability is the ability of a population to sustain itself over time, taking into account known data on birth and death rates, environmental conditions, and assessment of the risk of extinction and the population size necessary for long-term survival. Decline of a population is implicit within the concept of viability and therefore does not need to be explicitly added to this questions.	No change

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Standing Trees	Measurement Indicator(s): 1) Miles of trail maintained 2) Miles of trail maintained to standard 3) Trends in percent of total trail miles maintained 4) Miles of new trail built, and miles of trail permanently decommissioned	GMNF/ FLNF	Trail Maintenance: Is the quality of the Forest Service trail system being improved through operation and maintenance?	How many miles of trail are maintained annually and how many trail miles are meeting standard?	The suggested change is partially accepted. Specific amount of new trails constructed and existing trails decommissioned annually is not tracked. However, the net amount of designated system trail mileage can be reported annually to provide context for overall trail opportunities across the Forest.	Measurement Indicator(s): 4) Net change in designated system trail mileage
Standing Trees	Detailed monitoring question: Are wilderness areas trending to meet the national Wilderness Stewardship Performance? Are Inventoried Roadless Areas, which are candidates for future wilderness designation, being managed for wild and roadless characteristics? Measurement Indicator(s): 1) Wilderness stewardship performance (WSP). 2) Increase in the total element score per Wilderness for WSP measures. 3) Extent and type of management activities, including logging and permanent and temporary roads, happening in Inventoried Roadless Areas.	GMNF	Wilderness Areas Managed to Standard: To what extent are management activities meeting the intent of the Wilderness Act?	Are wilderness areas trending to meet the national Wilderness Stewardship Performance?	The suggested changes are not accepted. There is no need to add a detailed monitoring question and measurement indicator for inventoried roadless areas. Monitoring roadless areas that were inventoried for potential wilderness designation during the Forest Plan revision process does not meet the intent of the monitoring program because they are not included as any component in the 2006 Forest Plan. The 1982 planning regulations required a roadless inventory and wilderness evaluation be completed as a basis to recommend wilderness designation when revising Forest Plans (36 CFR 219.17(a)). Thirty-seven inventoried roadless areas totaling 124,321 acres were identified on the GMNF using the roadless inventory protocol during the 2006 Forest Plan revision process. About 27,473 acres of these areas were recommended to be designated as wilderness when the Forest Plan was completed in 2006. Of the 124,321 acres inventoried during Forest Plan revision, about 97,805 acres were not recommended for wilderness designation or not designated as Wilderness by the 2006 New England Wilderness Act. These remaining acres were allocated to other Forest Plan management areas and are now guided by their respective management area direction. Potential impacts to the roadless character within these areas from management activities are disclosed in site specific project analysis to ensure they remain viable to consider them for potential wilderness designation during the next Forest Plan revision process (2012 planning regulations at 36 CFR 219.7(c)(2)(v)).	No change
Bald	Certainly with Elements 6 and 8 and perhaps with others as well, I am concerned about study plots and the maintenance of scientific integrity. There is room for conflict of interest, either to show that some action is working well, or to disguise that some action is not working well. I do not believe you can overcome this issue with staff personnel who depend on field and monitoring results for their performance reviews. This idea of preserving scientific integrity needs serious attention beyond this proposal. Universities and non-profit organizations are not themselves the answer to this issue.	GMNF/ FLNF	Not applicable	Not applicable	Forest Service staff performance reviews are not dependent on what they document in their respective resource monitoring reports. Resource specialists provide objective information based on their respective monitoring data and professional expertise.	No change
Standing Trees	Revise the Forest Plan before making changes to the Monitoring Program because it is out of date, does not consider new and relevant science, and there have been major changes and new threats to the GMNF since 2006.	GMNF	Not applicable	Not applicable	The proposed changes to monitoring questions are intended to reflect a renewed consideration of each resource included in Forest Plan components (goals, objectives, desired future conditions, and Forestwide and Management Area standards and guidelines). Current and accepted monitoring methodology is based on scientifically sound information. The revision of the Forest Plan is not anticipated in the near future due to lack of funding which is appropriated by Congress for this purpose. Until funding is secured and the Forest Plan revision process complete, the current Forest Plan can be amended to reflect changed resource conditions and ineffective management direction. One of the primary purposes of the monitoring program is to identify potential changes to Forest Plan components needed for relevant and scientifically sound management direction through the amendment process.	No change
Standing Trees	Changes to the Monitoring Program should be treated as a Forest Plan amendment. Short of incorporating changes to the Monitoring Program into a comprehensive revision to the entire Forest Plan, we hope that the GMNF will treat changes to the Monitoring Program as a Forest Plan amendment, and postpone finalizing any changes to the Monitoring Program until after up-to-date Monitoring and Evaluation Reports have been made available for public review and additional public comment. We suggest that, at minimum, the Forest Service treat changes to the Monitoring Program as a Forest Plan amendment, and allow additional opportunities for public comment and other public engagement after providing the public additional explanation and side-by-side comparisons, Biennial Monitoring and Evaluation Reports, and other relevant documentation.	GMNF	Not applicable	Not applicable	Changes to the monitoring program can be made as administrative changes to the Forest Plan per the 2012 Forest Planning regulations at 36 CFR 219.13(c). The regulations state "a substantive change to the monitoring program made outside of the process for plan revision or amendment may be made only after notice to the public of the intended change and consideration of public comment". The public invitation for proposed changes to monitoring questions and consideration of comments received meet the intent of this requirement. The completed annual monitoring and evaluation reports for fiscal years 2006 to 2016, and the biennial monitoring and evaluation report for fiscal years 2017 to 2018 are now available for review on the GMNF National Forests planning website. Documentation of monitoring question changes are also available for review at the same website location including question changes from the initial monitoring program as a result of complying with the 2012 planning regulations and the question changes finalized in May 2026 after consideration of public input.	No change

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Standing Trees	Changes to the Monitoring Program should be postponed until after up-to-date Biennial Monitoring and Evaluation Reports are publicly available. It is not reasonable to collect public comments on changes to a Monitoring Program when the public cannot review any of the results of the Monitoring Program for the last 14 years — over two-thirds of the entire duration of the Forest Plan. Without this information, it is unreasonable to expect the Forest Service to develop well-informed changes to the Monitoring Program, or for the public to be able to provide the most relevant and helpful comments to proposed changes.	GMNF	Not applicable	Not applicable	<p>The <i>Green Mountain National Forest Monitoring Program Trends Report - Fiscal Years 2006 to 2013</i> is now available on the GMFL National Forests planning website. Also available on the planning website are the <i>Green Mountain National Forest Annual Monitoring and Evaluation Report - Fiscal Years 2014, 2015, and 2016</i>, and <i>Green Mountain National Forest Biennial Monitoring and Evaluation Report - Fiscal Years 2017 and 2018</i>. These reports include resource trends and recommended changes to the monitoring program identified during 13 years of Forest Plan implementation (fiscal years 2006 to 2018).</p> <p>The intent of changes to monitoring program questions proposed in June 2025 is to provide a more meaningful, feasible, cost effective, and scientifically sound means to understand if management activities are adequately addressing Forest Plan components and provide a basis to determine if associated resource trends can be evaluated.</p> <p>Monitoring questions have been designed to provide meaningful information to determine Forest Plan implementation effectiveness, provide recommendations to better meet Forest Plan direction, and identify potential changes needed to Forest Plan components including goals, objectives, desired future conditions, and forest-wide and management area standards and guidelines. The questions will also help identify project design changes to foster more effective implementation of management activities.</p>	No change
Standing Trees	The Monitoring Implementation Guide and Annual Monitoring Schedules should be made available on the GMNF planning webpage as soon as possible.	GMNF	Not applicable	Not applicable	<p>The purpose of the GMNF monitoring implementation guide and annual monitoring schedule are provided in Chapter 4 of the Forest Plan (Forest Plan, p. 113). While the monitoring guide is a publicly available document providing detailed information for each monitoring question, the monitoring schedule consists of internal informal guidance for Forest Service staff to incorporate monitoring and evaluation as part of their fiscal year work planning process. The 2007 and 2012 monitoring guides are now available on the planning website.</p> <p>The monitoring schedule was incorporated into the monitoring implementation guide as the basis for the monitoring program starting in 2017. The <i>2017 Implementation Monitoring Guide</i> is now available on the GMFL National Forests planning website and reflects changed questions resulting from the May 2016 monitoring program transition process resulting by the 2012 planning rule. The <i>2026 Implementation Monitoring Guide</i> is also now available on the planning website and reflects final changes to the monitoring program resulting from questions proposed for change initiated in June 2025.</p> <p>The 2017 and 2026 monitoring implementation guides include specific monitoring questions tied to Forest Plan components, measurement indicators, data collection methodology, and frequency of collection and reporting.</p>	No change
Standing Trees	We request as part of any process of changing the Monitoring Program, the Forest Service includes a plan specifically detailing how it plans to carry out a robust and timely Monitoring Program, in light of its past failure to publish Monitoring Reports, and additional pressures imposed by staffing cuts and increased timber targets.	GMNF	Not applicable	Not applicable	<p>Changes to the monitoring program to comply with the 2012 planning regulations was completed in May 2016. The first biennial monitoring and evaluation report covering fiscal years 2017 to 2018 is now available on the GMFL National Forests planning website. Subsequent biennial monitoring and evaluation reports were not completed due to staffing turnover and capacity, and budget constraints which were exacerbated during the covid 19 pandemic. Forest Service staff began to earnestly re-evaluate the monitoring program in 2023 to meet monitoring obligations and complete delinquent reports.</p> <p>The culmination of these efforts are the finalized 2026 monitoring questions (<i>2026 Monitoring Guide</i>). These questions are designed to track how well management implementation is meeting Forest Plan components (goals, objectives, desired future conditions, and Forest-wide and management area standards and guidelines) and documenting associated resource trends in a meaningful, feasible, cost effective, and scientifically sound manner. Although monitoring implementation like any management activity is subject to available funding, staffing capacity, and priority of resource programs; Forest Service staff are committed to keep the monitoring program on schedule.</p>	No change
Standing Trees	We request the Forest Service provide a substantive explanation of each of the changes proposed to the Monitoring Program, including but not limited to, a side-by-side comparison of the old and new versions of a given question (or for entirely new questions, the new question besides any previous questions that address the same element or any previous questions that it replaced), and a discussion of why the proposed changes are necessary and beneficial.	GMNF	Not applicable	Not applicable	<p>The <i>Green Mountain National Forest - Monitoring Question Changes from Fiscal Years 2006 to 2026</i> is available on the GMFL National Forests planning website that documents monitoring question changes from the initial 2006 monitoring program to the most recent question changes completed in May 2026.</p>	No change

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<p>VT Center for Ecostudies</p>	<p>Add monitoring of deer browse impacts on forest regeneration, structure and composition. Several of the described elements are focused on forest structure and maintaining or restoring habitat composition. Elevated deer browse has been demonstrated to impact forest regeneration, structure and composition. Deer densities as low as ten per square mile have been shown to impact the regeneration of preferred browse species in some eastern forests. Deer browse has the potential to negatively impact the anticipated results of forest management and should be incorporated into any management plan that aims to accurately monitor the effectiveness of management. Modeling from the USFS supports this as it highlights southern Vermont as having some of the highest probability for high ungulate browse impacts of forest land in New England (McWilliams et al. 2018).</p> <p>Prescribed Fire Monitoring in Vermont Dry Oak Habitats 2023 Report to the Green Mountain National Forest is available for review. High levels of deer browse at the plot level and a 10 deer per sq. mi. density suggest browse may be impacting the management goals for this stand even though the prescribed burn was conducted successfully and achieved many of its stated objectives.</p>	<p>GMNF</p>	<p>Not applicable</p>	<p>Not applicable</p>	<p>The suggested change is not accepted.</p> <p>The suggestion to consider deer browse impacts on management objectives is not directly tied to any Forest Plan component, but can be addressed with the existing detailed monitoring question specific to stocking levels: <i>Are lands adequately restocked within five years of a regeneration harvest or site preparation activities?</i></p> <p>Although impacts to regeneration from deer browsing is not specifically included in Forest Plan components, adequate regeneration of forested areas treated with regeneration harvest methods is required by the National Forest Management Act (NFMA): "All national forest lands treated from year to year shall be examined after the first and third growing seasons and certified...as to stocking rate, growth rate in relation to potential and other pertinent measures. Any lands not certified as satisfactory shall be returned to the backlog and scheduled for prompt treatment [NFMA Section 4(d)(1); and 16 USC 1604(g)(3)(E)(ii)]."</p> <p>Impacts from deer browse will be noted during first and third year stocking surveys. Management remedies to address inadequate regeneration will be determined on a case by case basis.</p>	<p>No change</p>
<p>Bald</p>	<p>It is essentially not possible to comment on monitoring programs at this time because I can find nothing on any kind of "monitoring" as a vital stewardship activity on the GMNF. I am aware of the change implemented in 2012, but I have not been able to find reports from that timeframe until now. This has made it impossible to get a sense of current conditions on the forest for proposed projects; even if the projects contain some kind of inventory or assessment, the larger view on private and public land is lost or obscured. This is a flawed approach.</p>	<p>GMNF/ FLNF</p>	<p>Not applicable</p>	<p>Not applicable</p>	<p>Annual monitoring and evaluation reports for fiscal years 2006 to 2016, and the fiscal years 2017 and 2018 biennial monitoring and evaluation report are now available on the GMFL National Forests planning website. Monitoring questions were changed in 2016 to comply with the 2012 Forest Planning regulations (36 CFR 219). Although project specific implementation monitoring and routine monitoring completed by some resource staff has occurred since 2019, the monitoring questions have not been holistically addressed or reported due to lack of staff and funding. The current proposed changes are designed to backfill missing information for fiscal years 2019 to 2024 and meet the intent of the monitoring program with questions that are more meaningful, feasible, cost effective, and scientifically sound.</p>	<p>No change</p>