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RUFFED GROUSE SOCIETY | AMERICAN WOODCOCK SOCIETY

60th ANNIVERSARY

Todd Waldron
Ruffed Grouse Society & American Woodcock Society
Northeast Forest Conservation Director

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Jay Strand
USDA Forest Service
99 Ranger Road
Rochester, VT 05767

RGS & AWS Supports the Green Mountain National Forest Telephone Gap Integrated Resource Project

Dear Mr. Strand:

Thank you for allowing us to submit comments on the Telephone Gap Integrated Resource Project.

RGS & AWS strongly supports this project and applauds the Green Mountain National Forest's Manchester and Middlebury Ranger Districts team for your efforts to promote forest resiliency, wildlife habitat diversity and healthy & functioning forest landscapes. We support science-based forest management and silvicultural activities like those incorporated into the Telephone Gap Integrated Resource Project proposal and we are available as a conservation partner to help the Forest Service move these projects forward.

RGS & AWS unites conservationists to improve wildlife habitat and forest health for ruffed grouse, American woodcock, and all forest wildlife. We promote forest stewardship for our forests, our wildlife, and our future. We envision landscapes of diverse, functioning forest ecosystems that provide homes for wildlife and opportunities for people to experience them. Ruffed grouse and American woodcock are bellwethers of forest condition; they can only persist in healthy, diverse forests. These same forests clean the air, filter water, and support local communities. Together with the American Woodcock Society (established in 2014), we work with government agencies to restore wildlife habitat diversity using science-based conservation approaches.

<u>Our comments regarding the proposed vegetative management activities follow below:</u>

- The vegetation management recommendations proposed in Telephone Gap IRP are aligned and consistent with the forest-wide goals and objectives relating to ecological diversity found in Section 2.2.2 of the Forest Plan (USDA Forest Service 2006). Specifically, Goal 2 of the Forest Plan, which is to "maintain and restore quality, amount, and distribution of habitats to produce viable and sustainable populations of native and desirable non-native plants and animals". This includes numerous objectives associated with forest structure, composition, and age class diversity. The even and uneven-aged silvicultural system treatments in the suitable areas designated within Telephone Gap IRP are a science-based pathway to achieving the Forest Plan goals and desired conditions.

- Tables 2 & 3 in the pre-scoping document *Telephone Gap Integrated Resource Project Landscape Assessment* indicate that there are serious gaps between the existing conditions found within the

Telephone Gap IRP "suitable areas" and the desired objectives and HMU targets established by the Forest Plan. For instance, according to Table 3 *Comparison of the existing age class distribution on NFS lands suitable for timber management within the Telephone Gap IRP Project Area*, the regeneration age class (0-9 years) is currently non-existent across any of the forest types – northern hardwoods, mixed woods, softwood, aspen, birch, and oak. There are currently **zero** acres of regeneration-age trees across the entire 6,768 acres. The current conditions are not congruent with many of the Forest Plan Goals, and the recommended silvicultural treatments (both even and uneven-aged) are solutions.

- Table 3 indicates that the current conditions for young forests (10-59 years - 1,192 acres), mature forests (60-119 years - 3,852 acres) and old forests (120 years+ - 1,724 acres) are all within their desired HMU objectives, with mature forests being nearly 24% above the desired high-end HBU target of 3,094 acres. RGS & AWS supports GMNF's efforts to work toward the desired HMU conditions in a way that supports age-class, species compositional, and functional diversity across all these age groups. Birds, wildlife, and people need old trees as much as we need young trees.

- *Forest Carbon Assessment for the Green Mountain National Forest (2019) p. 18* states:

  "*The long-term capacity of forest ecosystems and wood products to sequester and store carbon depends in large part on their resilience, adaptive capacity, and utilization of timber (McKinley et al. 2011). Under a changing climate, forests are expected to be increasingly at risk of a variety of stressors, including moisture stress, forest insects and diseases, invasive species, and extreme weather events (e.g., Kurz et al. 2008, Allen et al. 2010, Vose et al. 2012, Janowiak et al. 2018). While, maintaining resilient forest structures and composition will not eliminate those forests stressors, doing so can reduce the occurrence of significant disruptions that may cause large or long-term carbon losses (Millar et al. 2007, Millar and Stephenson 2015, Swanston et al. 2016). Ensuring that forests ecosystems are capable of adapting to changing conditions will help forests sequester carbon and store it more securely over the long term, while also providing woody biomass to help reduce fossil fuel use".*

- *Forest Carbon Assessment for the Green Mountain National Forest (2019) p. 19* states:

  "*Carbon losses from the forest ecosystem associated with harvests from 1990 to 2011 have been small compared to the total amount of carbon stored in the forest, causing the loss of roughly 0.4 percent of non-soil carbon by 2011. However, these estimates do not account for either the continued storage of harvested carbon in wood products or substitution effects".*

- Telephone Gap IRP's recommended even and uneven-aged silvicultural treatments are reported to be 11,801 acres, of which only 542 acres are even-aged treatments. On a landscape-level (GMNF) all the Telephone Gap treatments combined span only 2.9% of total forest area (assuming 404,973 total acres) and even-aged treatments represent 0.1% of the Green Mountain National Forest. Even if these even-aged figures are combined with the 12,000 acres of treatments in the Early-Successional Habitat Project area, it still only represents 3.1% of the entire national forest acreage. This lies well within *Vermont Conservation Design's* young forest parameters for an

ecologically functioning landscape, which is "5% of the forest in young forest condition throughout the Northeastern Highlands, Northern Vermont Piedmont, and Northern Green Mountains and 3-4% of the forest in young forest conditions in all other biophysical regions".

- *Forest Carbon Assessment for the Green Mountain National Forest (2019)* Page 19 goes on to state "*From a carbon perspective, forests in Green Mountain NF are thriving. Aside from expected, natural age-related slowing of carbon sequestration, forests have not experienced recent negative effects from disturbances or environmental conditions".* The same cannot be said for wildlife and habitat diversity under the current conditions.

Overall, it is critical not to approach this situation with carbon tunnel vision. The long-term capability of the GMNF to store and sequester forest and soil carbon is tied directly to biodiversity, forest resilience, and adaptive capacity. Through a balanced management approach such as Telephone Gap, we can work toward all these outcomes, while simultaneously creating recreational opportunities, equitable access to the outdoors, clean water, clear air, and resilient communities.

Ruffed Grouse Society & American Woodcock Society supports science-based sustainable forestry, promotes diverse forest landscape mosaics, and applauds the positive impacts the Telephone Gap Integrated Resource Project has on resilience, climate, people, forests, and wildlife.

Finally, Vermont's State Wildlife Action Plan p 14 reports *"Wildlife is very important to the people of Vermont. This love of wildlife is more than anecdotal. The 2011 National Survey of Fishing, Hunting, and Wildlife Associated Recreation conducted by the U.S. Fish and Wildlife Service documented that 62 percent of Vermonters went fishing, hunting, or wildlife watching. Vermont ranked second, only two points behind Alaska in participation (U.S. Dept of Interior 2011). When it comes to wildlife watching, however, Vermont was first in the nation with an impressive 53 percent of residents enjoying this activity. This same survey estimates more than $704 million was spent on fish-and wildlife-based recreation in Vermont".*

Ruffed Grouse Society and American Woodcock Society supports and applauds the Telephone Gap Integrated Resource Project. As a national and regional conservation partner with members and a chapter in the Green Mountain State, we support the Forest Service's efforts to initiate this project and we look forward to working with the agency as a key partner and stakeholder.

On behalf of our members and supporters, we thank you for your careful consideration and action to support healthy forests, abundant wildlife, climate solutions and promoting a conservation ethic in Vermont. RGS & AWS would be happy to comment further or address questions on these considerations in your future deliberations.

Respectfully submitted,

Todd H. Waldron

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Northeast Forest Conservation Director

Ruffed Grouse Society & American Woodcock Society

Ruffed Grouse Society & American Woodcock Society
451 McCormick Road, Coraopolis, PA 15108
(412) 262-4044 -- Toll Free (888) 564-6747
RuffedGrouseSociety.org