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Northeast Forest Conservation Director

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

**The Ruffed Grouse Society & American Woodcock Society Supports the Green Mountain National Forest Telephone Gap Integrated Resource Project Alternative B Modified Proposed Action.**

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 and 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. As highlighted in the *Preliminary Environmental Assessment for 30-day Comment Document*, there is a substantial imbalance in existing conditions and desired composition among northern hardwood, mixed wood, and softwood habitat types, with mixed wood and softwood habitat under-represented. There is also a low abundance of aspen and birch habitat occurring on suitable lands, an under-representation of oak forest habitat and a low abundance (less than 1 percent) or absence of regenerating age class (0 to 9 years old) across all habitat types. This not only impacts habitat diversity and quality, but also forest resilience, health, and adaptive capacity.

The vegetation management recommendations proposed in Alternative B Modified Proposed Action 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), while also considering public comments and concerns. 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 1-3 and 1-4 in the Preliminary Environmental Assessment indicate 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. There are currently **zero** acres of regeneration-age trees across the entire 13,780 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. 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.

Alternative B's recommended even, and uneven-aged silvicultural treatments are reported to be 8,205 acres, of which only 357 acres are even-aged treatments. On a landscape-level (GMNF) all the Telephone Gap treatments combined span only 2.0% of total forest area (assuming 404,973 total acres) and the Alternative B even-aged treatments represent 0.001% of the Green Mountain National Forest total area. This also 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."

Finally, Vermont's State Wildlife Action Plan p 14 reports: "Wildlife is 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."

**RGS & AWS supports and applauds the Telephone Gap Integrated Resource Project Alternative B Modified Proposed Action because it addresses both the significant gap between existing conditions and the Forest Plan and considers public comments which is also important.** 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.

Respectfully submitted,

*Todd H. Waldron*

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