

Objection to Proposed Harvest of Mature and Old Growth Stands as Part of the Telephone Gap Integrated Resource Project #60192.

I hereby register a formal objection on the grounds that the Final Environmental Assessment and the Draft Decision fail to adequately address the concerns expressed in my comment.

In response to my comment (# 525) regarding the Preliminary Environmental Assessment calling for permanent protection of the oldest stands proposed for harvest, it is stated that:

A mitigation measure has been added to the Final EA to address this issue (Appendix B, Ecology and Habitat, Late Successional Forest, p. B-1). Additional stands or portions of stands would be deferred from harvest if characteristics of old growth forests as defined by D'Amato and Catanzaro (2022) are identified during project implementation: greater than 12 live trees per acre greater than 20 inches diameter breast height (DBH) and contain more than 16 dead and down trees per acre greater than 20 inches DBH, and more than 8 standing dead trees per acre greater than 20 inches DBH.

My comment focused on the critical need to protect the oldest stands proposed for harvest in order to replenish late-successional habitat, which, though once common in New England, is now vanishingly rare. Such habitat provides critically important benefits in terms of increased carbon sequestration and reduced biodiversity loss, as well as many others, some of which were listed in my comment but have been ignored. The proffered mitigation measure reduces some short-term harm by way of deferred management, but in no way ensures the long-term protection so desperately needed if late-successional habitat has any chance of becoming even a small but significant part of the landscape.

As further consolation, it is also stated that the any stands or portions of stands identified during implementation as exhibiting the old growth characters listed by D'Amato and Catanzaro (2022) would also be deferred from harvest, but these are set so high as to offer little hope that such stands will be identified.

An additional response to my comment (# 525) states that:

An Alternative Development Process document was posted on the project website. This document describes the process and criteria used to identify stands that contain late-successional attributes. Stand age, due to unknown historic methodology, was determined to be an inaccurate metric for determining whether a forest contains attributes of old and mature forest. Alternatives C and D identified 814 acres of stands that contained late successional attributes that would be deferred from harvest (Preliminary EA, Section 2.5, Table 2-6, p. 26).

I'm afraid that I paid little attention to this important document in my rush to file my comment, and it is with much regret that I now note that Vermont Audubon and Vermont Natural Resources Council backed off from their courageous request that "all stands currently >150 years old within the project area, as well as a subset of those late-successional mature stands (120-150 years old) already exhibiting a high degree of structural complexity development" be included in "fully protected" reserves "with little or no silvicultural management." This ignoble retreat is reported in the cited document, which also reveals the lamentable process by which Alternative C was developed in an attempt "to address public issues regarding the amount of mature and old forests proposed for harvest." A tiny cabal of forestry insiders met to formulate a new policy by rejiggering a set of statistical thresholds to achieve a predetermined result. Without an independent measure of forest age, this process is entirely circular and neither scientific nor inclusive of the many public comments calling for genuine protection of older stands, and especially those meeting the Region 9 definition of old growth developed in connection with President's Biden's Executive Order 14072, none of which escape treatment under Alternative C.

At the heart of the revised policy is a shift from the protection of older forests judged by stand age to the “conservation of old and mature forest attributes.” Apparently, being old is not enough, and what really matters is the degree to which a forest has developed idealized characteristics said to apply to old forests. Otherwise, from this point of view, a little chainsaw medicine could be applied to make sure the forest shapes up and grows right. Imagine if social security worked this way. We’re sorry, Mr. Jones, but you just don’t qualify; you may be seventy one, but you don’t look a day over sixty four.

The statistical indices employed conflate forest age with site productivity in a way that obscures the effects of site variability on forest development. The quick and dirty LS Index is based only on the number of trees over 16 inches DBH, a size that may never be reached on more marginal sites. The oldest trees on Earth are often scraggly survivors under harsh conditions. In any event, a good score under the chosen indices requires that a stand have lots of big trees whether alive or dead (LS) evenly balanced by lots of smaller ones (H) on one of the most productive sites (Site Index). Obviously, this favors more productive sites, but from the point of view of overall biodiversity, the best approach would involve a representative sample of old forests encompassing a rich variety of different site conditions. From the perspective of maximizing carbon capture and storage, site-specific biodiversity, or awe-inspiring grandeur, it would make sense to emphasize the most productive sites. Certainly, there is an enormous deficit of old forests on quality sites since such sites are most in demand for other purposes, but to make site productivity a central defining feature of old growth has little ecological justification. It is doubtful if any of the recognized old growth in Massachusetts would satisfy the TGIRP criteria.

Stand 13 appears to be the oldest stand in the project (said to date from 1861) and Stand 8 (dating from 1925) are the only stands to be treated with “Non-commercial crown release and down wood enhancement” in an effort to enhance old growth characteristics. This raises the critical question of whether or not the putative advantages (which don’t appear to be specified) of these interventions outweigh the evident costs in terms of increased short-term GHG emissions from machinery and accelerated decay, damage to roots, soil, and mycorrhizal networks from heavy equipment, and the expenditure of taxpayer funds. Does the accelerated development of a simulacrum of a theorized old growth forest better serve public welfare than the simple expedient of leaving the forest alone to develop on its own? I think not, but this critical question is not even considered in the project documents.

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