

April 8, 2024

Hello,

I am writing as Executive Director of the Vermont Traditions Coalition. First, thank you for this opportunity to submit comment on the on the Telephone Gap ESHC project. I will reiterate that the Vermont Traditions Coalition fully supports implementation of proposed timber harvests in the Green Mountain National Forest. With the advanced age of the forests in this particular section, this project will be invaluable in creating a diversity of habitat that is currently lacking. This has been an ongoing, iterative process, and implementation should be undertaken in a timely manner.

While we understand there is some aggressive opposition from anti-logging activists, and that some folks are taking the position that no timber harvest should be done on public lands in Vermont, these management operations are decades overdue and will only serve to enhance the stability and biodiversity within our national forest. We must not allow that to be derailed by a misguided agenda that ignores the critical importance of manipulating habitat and actively managing our forests. We are disappointed to see the reduction proposed from the initial 11,000 acres of potential treatment to only 8200, but as this seems to be the best offering on the table, we are writing to advocate for implementation of Alternative B with no further reductions in proposed timber harvest.

The process for developing this plan was sound, the science behind this proposal is sound, and there is no reason to consider any other path than completion of these operations. Early successional habitat is critical to so many iconic Vermont species, and we are already sorely lacking in this habitat type. The GMNF is in desperate need of significant timber harvest to improve the quality of its habitat and support biodiversity within the state, and Vermont's own "Conservation Design" document acknowledges the need to create more early successional habitat, at which we are failing. We are naturally trending toward older forest, and implementing this habitat restoration plan in full will be a small step toward addressing the loss of early successional habitat that remains our looming habitat crisis. The GMNF is the perfect place to work toward these goals due to the ability to make decisions based on needs of the landscape rather than the market.

Alternative B is a reasonable management proposal to address the lack of diversity in stand types and ages which exist now.

93% of the area is northern hardwoods age 80-110; there are no forest openings or young, regenerating stands; there are no aspen-birch stands; no oak stands; and only 2% softwood stands. Alternative B would treat 8205 acres with various harvest methods, and when you enhance habitat diversity, you enhance biodiversity. Knowing that we have the capacity to do so, even on the more limited scale this plan provides, it would be irresponsible not to.

Should USFS wish to experiment with “old-growth”, it has long been our position that the opportunities in that area lie within areas that are unsuitable for timber harvest. Areas of historical significance, steep slopes, high elevations, riparian and wetland areas, and sensitive cultural or ecological sites all create intrinsic conditions that will lead to old-growth. Vermont Conservation Design calls for 10% old growth, and with nearly 35% of the Telephone Gap deemed unsuitable for harvest, the USFS certainly doesn’t need to further prioritize old-growth.

Timber harvest from this project will not only enhance our rural economy and our forest, but durable products created with it will continue to store carbon into the future while new growth will uptake carbon at a much higher rate than the trees being removed. This provides an important net benefit for folks concerned with climate change, and only serves to bolster our position that Alternative B is the proper path moving forward.

Finally, and again we have long held this position, trail systems and access roads must be maintained and considered in implementing this plan. Our National Forest belongs to all, not just the able-bodied. Roads and motorized recreation allow mobility-limited Vermonters to enjoy these lands alongside everyone else. They are a key piece of our forest infrastructure that helps ensure buy-in from diverse groups to the value of conservation on a broader scale.

My best regards,

Mike

Mike Covey

Executive Director

Vermont Traditions Coalition

(802) 461-3786