

## TELEPHONE GAP PRELIMINARY ENVIRONMENTAL ASSESSMENT

3/8/24

### GMNF has had success with many similar projects

- Telephone Gap is not a unique proposal. It is no different than the four previous projects carried out since the Green Mountain National Forest Plan was approved in 2006. Those projects have either been successfully completed or are well along with no unusual problems encountered. All projects conform to the same environmental measures, standards and logging methods dictated by the Environmental Impact Statement accompanying the 2006 Forest Plan. Based on past experience, there is no reason to expect anything but a successful outcome with Telephone Gap.

### Forest & Wildlife Diversity

- As it exists today, Telephone Gap lacks the diversity of forest and wildlife habitat needed to support a broad array of birds and animal species, and to remain sustainable over a long period of time. Northern hardwoods (beech, maple, yellow birch) cover an overwhelming 93% of the suitable lands, with few areas of softwood species. It's all the same monochromatic forest type. Habitat for a variety of birds and animals does not exist. Likewise, 87% of the forest is 80 years old or older. There are no forest openings growing newly-regenerated seedlings/saplings and few acres with young pole-sized trees. Through timber harvest, Telephone Gap aims to create new young forest stands scattered over 5-10% of the area. New habitat for an expanded variety bird and animal species will be created.

### Old Growth

- No timber harvest will occur in so-called "Old Growth" forests. Organizations such as Standing Trees claim otherwise, but they are using their own made-up definition of "Old Growth" different than that used by federal agencies. All federal agencies, including the U.S. Forest Service, have agreed on a definition of "Old Growth" which is the standard to be used by all. The Environmental Assessment for Telephone Gap states clearly that no timber cutting will take place in "Old Growth" timber stands.
- No timber harvest is planned within State of Vermont defined "Old Forest." There are 765 acres of "Old Forest" within the overall project area, but none will be cut.
- If the GMNF wishes to experiment with the "creation" or enhancement of Old Growth, as in Alternative C, then there should be multiple opportunities to do so on non-suitable lands.

### Economic Benefits

- The annual estimated economic impact from timber harvest on all lands in Vermont is estimated to be around \$2 billion. If timber harvest on the GMNF represents only 4% of this total, as claimed by Standing Trees, then its contribution amounts to \$70-80 million per year to the economy of Vermont. That is a significant positive impact and much of it is felt by rural towns which need it the most. Standing Trees wants to stop all tree cutting on federal and state lands. They exhibit no concern at all for the devastating impact that would have on rural Vermonters.

### **Carbon Cycle**

- 87% of the forest in Telephone Gap is older than 80 years and is likely sequestering less and less carbon each year. Eventually, if left unmanaged and as older trees die, the carbon cycle will shift to one where more carbon is being released into the atmosphere than is being stored by the old trees. Through timber harvest in Alternative B the GMNF proposal will create 1800 acres of new forest openings supporting fast-growing seedling/sapling stands and increase growth rates on another 7,700 acres through selective cutting, thinnings, improvement cuts and TSI (Timber Stand Improvement). All these practices should result in a substantial increase in carbon capture and sequestration in the future.

### **Wood Substitutes**

- Trees cut in Telephone Gap will release carbon into the atmosphere if used for firewood or other temporary purposes. However, approximately half the timber volume cut will be processed into veneer, lumber, furniture and other materials to be used in new construction of all types. The carbon in these materials will continue to be stored, likely for decades, and will not be a factor in carbon emissions for a long time. Another advantage to be considered in the overall carbon equation is that wood used in construction is produced using far less fossil fuel than steel, concrete, or plastics. Concrete, iron and steel production accounts for 27% of the world's carbon pollution, according to a Fair Planet Report. Thus, substitution of wood for those materials benefits the overall carbon cycle.

### **Pertinent excerpts from recent scientific/professional journals:**

#### **National Woodlands-Volume 45 Number 3**

#### **“Working Forests-A Path To Climate Solutions”**

#### **David Wear, Non-resident Senior Fellow at Resources For The Future**

- Regarding carbon sink from U.S. forests, 85% accrues from net biological growth and 15% accrues from carbon stored in long-lived wood products.
- The rate of greenhouse gas sequestration has been declining since the 1990s, mostly due to slowing of growth in aging forests.
- Carbon storage in long-lived wood products can be increased further by substituting wood for cement, steel and plastics and by greater use in mass timber technologies.

#### **National Woodlands-Volume 45 Number 3**

#### **“Forest Carbon from Young vs. Old Forests”**

#### **National Council for Air and Stream Improvement**

- Between 15 to 90% of the carbon in landfilled wood and paper may be stored indefinitely.

**National Woodlands-Volume 45 Number 3**  
**“Timber Harvest and Carbon”**

**USDA Office of Sustainability and Climate**

- Harvesting and the use of harvested wood products can play an important role in reducing carbon emissions while managing healthy forests.
- When considering the whole system – forest carbon, use of forest products, and risks from environmental extremes – carbon emissions can be much lower (from managed forests) than if the forest were unmanaged.

**Northern Woodlands/Spring 2023**

**“An Introduction To Forest Carbon”**

**Alexandra Kosiba, Assistant Professor of Forestry at UVM**

- To maximize both (carbon) storage and sequestration requires a diversity of tree ages and complexity in forest structure, which includes canopy gaps, trees of different sizes, standing dead trees and downed logs.
- Because climate impacts and disturbances can affect certain species or age classes differently than others, diverse and complex forests are often better able to withstand and recover from extreme weather events, insect and disease outbreaks and other stressors.

**The Northern Logger – February 2023**

**Understanding Forest Carbon**

**Charles Levesque, President of Innovative Natural Resources Solutions**

- Carbon sequestration and carbon storage peak at different stages of forest development. In the northeast, fully-stocked forests between the ages of 20-50 years sequester the most carbon annually.
- Age and structural diversity within a forest and across the landscape is the best way to maximize both carbon storage and carbon sequestration. Having a diversity of ages is a good strategy for climate resilience and wildlife habitat.
- Harvest thinnings and timber stand improvement make more room for healthy trees which increases the likelihood they will be used in a long-lasting manner and store carbon for decades.
- There are thousands of houses in the northeast that contain carbon sequestered by trees hundreds of years ago. The advent of mass timber products provides increased opportunities to store greater amounts of carbon while replacing more carbon emissions intensive construction materials.

## **USDA Report – 2024**

### **Old Forests May Be Losing Ability To Hold Carbon**

- The ability of forests to absorb carbon will start plummeting after 2025 and could emit up to 100 million metric tonnes of carbon per year from decaying trees. Older, mature trees absorb less carbon than younger trees and U.S. forests are rapidly aging.

## **Vermont Woodlands – 2024**

### **Ethan Tapper, Chittenden County Forester**

- Leaving all our forests unmanaged is not a viable or responsible long-term strategy for carbon or for climate mitigation.