

**Objection: Telephone Gap Integrated Resource Project
Green Mountain National Forest
Draft Decision Notice and Finding of No Significant Impact
1/17/25**

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To: Christopher Mattrick, District Ranger
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I have provided two sets of comments in the past, both largely centered on the ecological conditions of the Telephone Gap Project (TGIRP). The responses to my most recent comments for the most part show that someone thoughtfully read them, and tried to respond to the concerns. I have felt heard, but in many cases, there was either a misunderstanding, disagreement in a few cases, or just a cursory incorporation of the concern with no real change in thinking or approach. I object to the draft decision on both the alternative chosen and the finding of no significant impact.

The Green Mountain National Forest (GMNF) staff response to many commenters was that the concern or change requested would not meet the purpose and need associated with the project's objectives. Those are largely based around the 2006 Forest Plan Goal 2 for increasing mixed forest. My comments argued that this was misplaced because it involved trying to increase the regeneration of red spruce; a species whose core range is more northerly and is projected to be radically changed by climate temperature projections, and for which USFS's own documents argued was probably not a sound climate strategy in this more southerly location of its range. Pockets may survive and be encouraged, but as my comments argued, I don't feel red spruce management should not be the entire foundation that justifies this project. I suggested that the 2006 Forest Plan Goal 2 for maintaining northern hardwood where they were ecologically supported was equally, or more, justified as a purpose and need for the TGIRP. The comments I submitted on the Environmental Assessment went to great length to explain why this location, over all other locations in the GMNF, should focus on northern hardwood, and rich northern hardwood specifically, because its bedrock was completely different than nearly all the rest of the GMNF. This location is specifically where the calcareous Taconics geologically connect to the Greens, which are not calcareous. Repeatedly, the response to my focus on rich northern hardwoods was misunderstood during staff review as a soil issue around downslope movement of nutrients. That is true in most of the GMNF, but not here in the largest and oldest example of a rich northern hardwood forest in Vermont, and potentially the region - in this location, rich northern hardwoods are driven by the underlying

bedrock, and that is exemplified by there being so much of the community being found at higher elevations than normal and being so spatially expansive.

So much of the public concern about TGIRP revolves around the age of the stands found in this area. Many respected foresters, naturalists, and forest ecologists, and others I don't know, spent hundreds of hours analyzing the Environmental Assessment, and suggested reasonable modifications to the four Alternatives that GMNF presented, in order to allow the oldest stands to continue to mature. Overwhelmingly, the staff response to those comments was that the age of old growth or even old forest is relatively arbitrary and fell back on a definition of old growth forests proposed by D'Amato and Catanzaro (2022), and state that definition would be used to protect any old stands with those characteristics found during project implementation. This is not an adequate response - the public comments are focusing on conserving a forest resource that is rare for the entire region, thousands of acres and a large forested landscape context where the forest has aged to the point far beyond most examples left. The comments were not trying to argue the definition of old growth; the suggested alternative were all saying in different ways that the old forest should simply continue to age. Normally in natural resource planning one starts by defining and conserving what is most rare about that landscape. My argument is the cut-off should be 120 years of age as that is the definition of old forest in the 2006 Forest Plan which TGIRP operates under, and because a rich northern hardwood forest at this scale is itself a rarity, and thus, could in a relatively few numbers of years become an exceptional example of this forest community. Others argued stands older than 150 years of age (one argued 141 years old because of the actual stands) should not be harvested, which is when ecologists generally consider natural disturbance processes start dominating the gap formation typical of unmanaged northern hardwoods. The barest minimum change to address this shortcoming of the draft decision is to simply remove the 817 acres in the 19 stands identified in April of 2023 as Mature and Old-Growth Forests in Fulfillment of Executive Order 14072, Section 2(b) from the land to be harvested or otherwise managed.

Finally, in both of my prior sets of comments (John Roe March 13, 2023 and April 8, 2024) I have argued that the project's forest management activities within the Diverse Backcountry, which covers most of the proposed TGIRP management area, violates the 2006 Management Plan. The creation of that plan, including the spatial defining of various types of management goals, involved extensive public input. The current staff response to my concerns that it doesn't prohibit forest management is side stepping my concern. Diverse Backcountry defines the area where the forest will predominantly be 150 years old or more. Normally that would be determined by some calculation of mean stand age, or at least some aggregation of stand data. It does not meet the intent of the 2006 plan to argue that, for example, a large clearcut can be balanced by the parts of the forest that are too steep to harvest. If GMNF, after just approximately 10 years, is proposing harvests in the very oldest stands that are just barely reaching 150 years of age then the goals of the 2006 Plan will never be met, particularly if no attempt is even made to justify how the proposed management meets the defined intent of creating a 150-year-old forest. Once a stand is managed it is no longer a 150-year-old stand. I would argue that until the overall forest within Diverse Backcountry reaches 150 years old then there is a violation of the Management Plan if any harvest is proposed, beyond the most limited

possible aimed at some very narrowly defined threat to the public safety. A commenter (Kinville) opposed to the hut on South Pond used a similar argument - a use that was lost by fire prior to GMNF ownership cannot simply be placed back onto the land just because the staff or public desire it, but the 2006 Management Plan prohibits it. The GMNF cannot argue both sides of the coin - the TGIRP harvest are justified supposedly because the 2006 plan requires increasing the representation of mixed forests, and staff comments rebuff public comments that don't support that approach, but then TGIRP ignores the fact that the 2006 plan also states the management actions should support the development of a 150-year-old forest. This misuse of the 2006 Management Plan, and the sidestepping of the issue when I and others have raised it in comments, is so intellectually egregious that I think TGIRP Alternative A should be adopted, or TGIRP as proposed should be scrapped and redone to be in conformance with the 2006 Management Plan, or better, spend the time on a GMNF Management Plan Update that incorporates climate change science better, or simplest, the final decision on the TGIRP should remove all management within the Diverse Backcountry that conflicts with the obvious intent in the area's defined goals.

Conclusion: Many people have spent much time trying to improve TGIRP in ways that they feel better reflect current climate knowledge and ecological benefits. The TGIRP and its proposed harvests is simply being proposed at the wrong place, at the wrong time, and at the wrong scale to feel like it is supporting the forest found here. While I will acknowledge that GMNF has made attempts at addressing some Environmental Assessment concerns, most often the actual changes are to narrative language and buried in the harvest implementation standards and process where few have any hope they will serve as much guidance when outside of the public eye. Or alternatively, particularly around invasive species issues I have raised in my comments, a confidence around an ability to manage invasive species before and after harvests that simply is not shared by any foresters I know who deal with enriched forests in a warming climate.

I do think there are two alternative ways forward that would meet my concerns and I feel the concerns of many. One is what commenter Jonathan Gibson called Enhanced Alternative A. Basically that removes the timber harvesting from the project, but allows some of the habitat improvements around invasives, aquatic resources, oak enhancement and trails. The other was a new Alternative I proposed in my Environmental Assessment comments. I would like to incorporate all of my past 2023 and 2024 public input comments on the TGIRP process into this Objection document, but I want to more directly incorporate my proposed Alternative which revolves around the Forest Plan Goal 2 for maintaining northern hardwoods and Forest Plan Goal 9 for Demonstration areas, through modifications of Alternative D, as I think the greatest public good come in those two Goals. Below is what I proposed in my April 8, 2024 comments on the Environmental Assessment as item 8 and which I consider the best remedy for resolving my objection:

8) *The EIS or final EA should address and analyze a new Alternative:* The Forest Plan Goal 2 around maintaining northern hardwoods should be combine with the Forest Plan Goal 9 for Demonstration areas, in this case the late successional enhancement harvests. Use Alternative

D as the base as it does a reasonable job of removing remote stands in areas likely to be enriched and supports water quality better than B or C. Then, from that base make the following adjustments:

- No harvest of any stand older than 120 years of age, the definition of old forest in the current Forest Plan, so that the alternative is biased to retaining the largest trees which should grow for many years for carbon sequestration and undergo natural gap formation as the forest ages.
- No harvest in the Pittenden Inventoried Roadless area.
- No harvest of rich northern hardwood communities north of the Chittenden Town Forest.
- Maintain the aspen/birch early succession goals, but place the clearcuts as much as possible in younger stands with maximum opening sizes of 3-10 acres, but totaling the same acreage.
- Maintain the growth enhancement work in the old 1990's patch cuts.
- Maintain the climate change planting work with oak
- Instead of proactively removing hazard ash along the roads, do it when needed as a way to add downed wood into these stands.
- Only use uneven aged harvest prescriptions outlined in the late successional enhancement techniques for harvest, except for the aspen/birch and climate planting work. Whenever possible, use small group selections, with explicit guidance on using a range of opening sizes from very small .1 acre to 1 acre with a one-acre opening being very rare and ones smaller than .5 acre very common, or variable density thinning with a bit more use of skips. The goal is to make sure a significant proportion of the stand does not have a disturbed floor or canopy, while making sure there are distinct areas of early succession. The wildlife, particularly birds, will respond better to a mix of distinct habitat types versus more uniform reduction of volume. These harvests should also have explicit downed wood and snag goals.
- This alternative should be explicitly designed to meet the goals of the Diverse Backcountry of a forest that is 150+ years old.

Thank you for the chance provide further thoughts on TGIRP.

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