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Dear GM Forest Service staff,

I appreciate the significant time and energy you have put into the Telephone Gap IRP, both planning the project itself and attention to transparency and public input. I attended a couple of your webinars, including the recent one on the most effective way to comment on the project, so I'll do my best to follow your requested guidelines.

Working from your Executive Summary:

Section 2.1 - According to the key reference Wetland, Woodland, Wildland 2nd edition, softwoods have been declining in our area, so why should the forest service desire to increase softwood habitat? Most of the forested areas of Vermont are indeed mixed, with small pockets of mostly softwood within the landscape, as well as random softwoods among the hardwoods. You know that the soil pH and ecology are very different in hardwood v. softwood. I encourage the FS to trust nature on this one.

The observation that there is low abundance (<1 percent) or absence of regenerating age class (0 to 9 years old) across all habitat types should not be a reason to clearcut areas. For one thing, your report points out that we are already seeing increased loss of trees within forested areas due to insects and disease such as the EAB and beech bark canker. I can tell you that mature forests have a wide variety of ages and sizes of trees, because I live in one and spend a lot of time in these forests.

Section 2.2 - I'd like to push back on the idea that forests are primarily to support people, as the opening paragraph on page 4 of the Forest Plan states "Thus the national forests serve the people." I encourage you to take the perspective that people should serve the forests. Yes, wood products are important for building, but surely these resources can come from private land, especially tree farms. Burning wood products for heating on a large scale is not a responsible or sustainable endeavor, and policies around its use need to be changed. I do not believe that loss of beech and ash are "preventing the establishment and growth of other tree species." You are already planning to selectively harvest areas of widespread EAB infestation near roads, etc. to prevent them falling and causing damage, but how about replant useful species like hickory, which will help replace the mast lost from the beech that bears depend on?

Sections 2.3-2.8 - I do support restoration of streams, prevention of erosion and maintenance of recreational trails, although care does need to be taken to reduce and prevent damage and introduction of non-native plants from vehicles of any kind, as some people in your meetings have also been concerned about.

Section 3.1 - Timber harvest treatments are biggest problem with the plan. When areas are clearcut, or large areas are thinned with heavy equipment, the land doesn't just lose the trees. The ground is compacted by the heavy equipment, soil dries out and living beings from microbes to mycorrhizal fungi to plants of the forest floor die, and the whole ecosystem breaks down. Ecology is a word I did not hear much in your webinars, and I want to stress that it is the foundation of the wellbeing of the land. Clearcutting and shelterwood cuttings need to cease as forest management strategies. Even-aged and two-aged regeneration plans only benefit ease of future clearcuts, not forest ecology! The oldest trees in these forests are apartment buildings, hubs of activity that are critical to birds, fungi, etc, even when they are dead. Healthy forests are messy, with many species of different ages all growing together, supporting one another in a fabric of interdependence and biodiversity. This should be the goal, not creating tree farms.

Neither forest fires nor controlled burning for forest management in the Northeastern area have historically been

common. The lack of fires is one reason why these NE forests are much safer investments in carbon sequestration than those out west. I would also like to push back on burning almost 1000 acres of forest, even with overlap of other treatments.

If you can help prevent the spread and damage from non-native threats like EAB, that would be a good thing, especially saving black ash wetlands.

I do encourage tree planting, especially of species that provide food for wildlife, such as nut-bearing species like hickory and American chestnut. Why red oak and not chestnut oak, which are growing in SE Vermont and provide excellent acorns?

Section 3.6 - By changing the plans for clearcutting and other intensive activities, then there will be far less need for increased road, log landing and other potentially damaging infrastructure to be built.

Finally I'd like to briefly revisit the need for increasing "regenerating age class" or 'early succession habitat'. First of all, young forests aren't necessary for wildlife habitat, as recently established scientifically in Kellett, 2023. Yes, I have observed that new tree growth is helpful to moose, who need a lot twigs, bark etc daily. But I can tell you there are abundant birds, including ruffed grouse, and other animals in the mature (about 100 years old) forest where I live. How about instead of cutting mature forests to increase young forests, we identify areas that are already deforested, unfortunately like former dairy pastures and land previously cleared for lawns and views. Especially if areas that will expand habitat are identified for reforestation, we can avoid the problem of fragmenting wildlife habitat, which is an important goal, especially for the northern long-eared bat. In short, increasing forested acreage in areas that are largely safe from major threats like forest fires is one of the important solutions to climate chaos to implement right now.

I understand that you are working with out-dated documents, and the USDA bureaucracy moves slowly. But the Earth's imperatives are more immediate and compelling. We need to be progressive and proactive right now to mitigate the worst of climate chaos. Please revise the Telephone Gap IRP to reflect the urgency and evidence-based reality of what the forest, and the Earth by extension, need desperately.

Thank you for your attention and consideration.

Sincerely,

Elizabeth Bancroft