

Data Submitted (UTC 11): 4/8/2024 4:00:00 AM

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Organization:

Title:

Comments: Dear Sirs,

Please accept the attached comment regarding the proposed Telephone Gap Integrated Resource Project.

Sincerely,

J. William Stubblefield

In order to better serve the essential welfare needs of humans and the living world more generally, the no-harvest Alternative A should be adopted, but short of that, protection of our oldest forests should be our first priority because of the outsized benefits they provide. I was, therefore, glad to see vital information on the oldest stands slated for treatment in the Telephone Gap Project made publicly available on 27 March 2024, even with only 12 days remaining in the way-too-short comment period for this large and complex project.

In particular, one of the provided tables reveals that 19 stands dating from 1861 to 1883 meet the Region 9 mature and old growth working definitions provided in USDA Forest Service paper FS-1215a in fulfillment of Biden's Executive Order 14072. The relevant definition includes stands older than 141 years with least 10 trees per acre over 16 inches in diameter. The 19 stands total 871 acres, of which 691 (about 84.6%) are slated for harvest treatment. All 19 stands should be set aside as permanent reserves with no active management so they can develop to their fullest ecological potential and become Old Growth in the fullest sense.

There is a compelling case for including all stands dating from the nineteenth century, the youngest of which dates from 1895, since all of them will be over 141 years old by the end of the project, 15 years from now in 2039. This would add 8 stands dating from 1886 to 1895 comprising an additional 334 acres of which 235 acres (about 70.4%) are proposed for logging under Alternative B. Alternatives C and D would [ldquo]defer[rdquo] harvest of only one stand of 37 acres of which 36 acres would receive harvest treatment under Alternative B. Wow! Only 37 acres [ldquo]deferred[rdquo] by Alternatives C and D in order [ldquo]to address concerns associated with harvesting mature and old forest.[rdquo] Instead of protecting our oldest forests, the project actually targets them. Surely, the USFS can do better than that.

Altogether, these 27 legacy stands dating from before the beginning of the last century are comprised of 1151 acres of which 926 acres (about 80.5%) would be logged under Alternative B or 890 (about 77.3%) under Alternatives C or D. The 1151 acres comprise only about 3.2% of the 35,489 acres of National Forest land in the Telephone Gap project area.

These stands are precious beyond words and deserve full and permanent protection.

The Vermont Natural Resources Council has also proposed saving legacy stands but only stands older than 150 years (i.e. dating from 1874 or earlier) which eliminates most of the 27 stands proposed for protection here. In fact, only 11 stands meet the VNRC threshold. Dating from 1861 to 1873, these 11 stands are comprised of 521 acres with 421 acres (about 81.4%) slated for harvest. If the VNRC proposal were dated from the last project year in 2039, all stands dating from 1889 or earlier would be included, for a total of 23 stands or pretty close to the 27 stands proposed here.

All legacy stands should be surrounded by a buffer zone (as are streams, ponds, and other wetlands) in order to minimize harm from hazards that are likely to worsen with nearby harvest activities, such as fire, wind, and damage to soil from heat and compaction. In cases where legacy stands are located near each other, they should be combined into a single reserve surrounded by a buffer zone.

Some reasons for establishing these legacy reserves are:

1. Climate: It is the older, larger trees that contain and continue to pack on the most carbon and are therefore most valuable for climate mitigation.
2. Biodiversity: Stands approaching old-growth age are exceedingly rare in New England and more are needed to guarantee suitable habitat for species needing or preferring old forests.
3. Ecosystem Services: Aside from wood products and hunting opportunities, nearly all the benefits forests provide are enhanced by a hands-off approach, including water filtration and flood mitigation, evaporative cooling and local rain enhancement, air quality maintenance, forest soils full of carbon and teeming with life, bioavailable nutrients for aquatic ecosystems, the rewards of nature study, and opportunities for immersion in the natural world to support healthy child development and enhance the physical, mental, and spiritual well being of people of any age.
4. Science: The paucity of older forest habitat limits the ability of scientists to study the many changes that accompany increasing stand age, including carbon dynamics and biological diversity. In the latter case, special attention should be devoted to studying those taxonomic groups expected to benefit from old forest habitat, such as fungi, lichens, and mosses, and the communities they support, as well as insects and other arthropods that utilize dead wood.
5. Visitor Experience: There are good reasons to believe that visitors to the GMNF would find their visits more enjoyable and deeply rewarding if they included direct experience of being in old forests. By providing legacy forest reserves supported with suitable access, maps, and signage, it would be possible to determine, through questionnaires and interviews, the extent to which older forests contribute to an enhanced visitor experience. This would provide valuable information to help guide future policy.
6. Stewardship: Legacy reserves would help restore and polish the tarnished image of the USFS as a trustworthy steward of living diversity and our natural heritage by providing a glimpse of the ancient forests that once dominated the landscape prior to the extractive assault of colonization.

Do not miss this opportunity to do something of great value and lasting significance!