Data Submitted (UTC 11): 2/20/2023 11:43:32 AM
First name: Georgiana
Last name: De Rham
Organization:
Title:
Comments: Hello US Forest Service and Mr. Strand,

After reviewing the Proposed Action Plan for the Telephone Gap Integrated Resource Project, I have some concerns regarding the project's potential impact on flood resiliency, carbon sequestration, and the multiple threatened, endangered, or RFSS species, as listed on pages 34-36 in the proposal.

While I acknowledge the long history of human intervention in the forest and the role of the forest economy in the state of Vermont, I strongly believe this plan should be modified to prioritize ecosystem protection over economic services, primarily in the form of timber harvest.

As President Biden outlined in his 2022 Executive Order on Strenthening the Nation's Forests, Communities, and Local Economies, only a small percentage of mature and old-growth forests remain, prompting Biden to call on us to "conserve America's mature and old-growth forests on Federal Lands." However, the Telephone Gap IRP proposes habitat management in 4,794-9,618 acres of mature trees and 686-6,472 acres of old trees in the proposed project, as outlined in Table 4, page 9 of the proposal. It is significant to note that young forests do not have the carbon storage capacity that mature forests do, making it critical to protect older stands. Furthermore, the project currently proposes a total timber harvest area of 11,801 acres, with regeneration slated for only 8,200 acres, and only 901 of those acres with species adapted to climate change, as noted in Table 8, pages 16-17.

Concerningly, the proposal notes on page 11 that the timber management plan will provide "renewable wood products" and allow for "improvement of timber stands for commercial activity." However, recent research indicates that burning biomass is a poor source of renewable fuel for long term heating measures at scale, and should be de-emphasized in lieu of other sources, such as geothermal heating. Furthermore, emphasizing timber management for commercial purposes is problematic. As climate change accelerates, it is more prudent to emphasize forest management for ecosystem protection. As forester David Brynn noted in his 2015 report, Enhancing Flood Resiliency of Vermont State Lands, "protection of ecosystem services promotes forest health while exploitation of the economic services provided by forests connotes forest use" (p. 13). I am concerned about the emphasis on "forest use" in this plan over the protection of forest ecosystems. I would also like to reference Brynn's recommendation in the 2015 report that forwarding paths for logging result in "less soil compaction and less disturbance" (p. 44) compared to skid routes, which the Telephone Gap IRP proposes on page 19.

Furthermore, the sheer quantity of endangered, threatened, and RFSS species listed on pages 34-36 of the proposal is concerning. As we face a critical crisis in biodiversity, it is more important than ever to preserve habitats for those plants and animals. Forests are complex and adaptive, ecosystems, as evidenced by the "Forever Wild" Adirondack Park in New York State.

Despite my qualms over what I see as problematic timber management and silviculture practices proposed in the Telephone Gap IRP, I would like to acknowledge the importance of adding water bars, improved road infrastructure, and the desire for trail access in the area. I do believe that these elements could benefit the forest community and the human community. However, I believe this proposal needs to be comprehensively revamped to offer a truly beneficial climate management plan that supports a healthy and diverse forest, carbon sequestration, human health, and flood resilience.

Thank you.

Sincerely,
Georgiana de Rham