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Comments: Please accept my comments on the USFS Telephone Gap Resource Project. In general, I found the objectives of the project to be somewhat flawed, and out of touch with the need for exemplary climate forestry and climate reserves as we enter the climate of the Earth's most challenging time. I fully understand and appreciate the desire to harvest timber for economic uses, and support some harvesting within the Green Mountain National Forest, but this plan appears to be an aggressive approach, the reasons for which lack integrity in my view.

For instance, the executive summary states, "Improvement of timber stands is needed where trees with poor form, quality, structure, and composition are inhibiting the growth potential for healthy forested conditions". I object to your use of the term "healthy", and perhaps you should use "economically healthy" instead. Trees with poor form, quality and structure don't mean they aren't "healthy", just that they cannot be converted into cash. As for composition, according to researcher Charlie Cogbill and County Forester Ethan Tapper, beech originally comprised over 40% of the forest. Just because it is not economical and currently plagued with beech bark disease (will it always be so?) doesn't mean it should be reduced in composition, necessarily, especially on national forest lands. Private lands are another story.

The executive summary also states, "A low abundance of aspen and birch habitat occurring on suitable lands". These are early successional species that originally probably comprised less than 5% of the landscape, associated with wind events, beaver meadows, and the like. Humans have "gotten used to" an abundance of the species that like these habitats, such as woodcock, but we don't need to serve human desires for an artificial abundance.

Also, "There is also a need to reduce the risks to human health and infrastructure within the Telephone Gap project area caused from future widespread white ash mortality and to preserve black ash where it occurs in State of Vermont significant hemlock-balsam fir-black ash seepage swamp natural communities". These are two different ideas that relate to the emerald ash borer, so they should be approached separately. First of all, one could argue that there will be risks to human health and infrastructure throughout the GMNF through ash mortality, so it makes little sense to call it out in this plan as if GMNF is not going to pay attention to it elsewhere on the forest. So this is a red herring.

Also, "There is a need to provide additional opportunities for specific trail uses such as mountain biking and horseback riding within the project area. At the same time, the challenges involved in maintaining existing trails and facilities to desired standards could lead to increases in health and safety risks and potential damage to resources such as soil, water, and fisheries." First of all, is there really a need, or just a desire? I would argue the latter. Secondly, these two sentences in the executive summary are contradictory: we need more trails, but the uses of trails could get out of hand!

Also, "Conduct oak habitat enhancement treatments on 348 acres including cutting undesirable tree species, planting oak seedlings, and application of herbicide to maintain and increase red oak abundance." Oak is found on the escarpment, and as the climate warms, it will make its way into the more interior portions of the forest through natural seed dispersal by wildlife. Herbicide use and fire are a very aggressive approach to getting oak regeneration and growth that may come naturally over time - probably not so much in the Telephone Gap area due to elevation, soils, moisture, etc., but throughout the portions of the forest where it will be more adaptive.

Finally, "More than 5,000 acres of timber stands in the project area are overstocked with trees and are experiencing reduced growth and increased density-caused mortality." I'm not sure where these sites are, but they probably are areas that have regrown post clearcutting. So it would be natural and expected that there would be stem exclusion over time as trees compete for sunlight and nutrients. The language seems to imply that these sites just aren't working like a forest ecosystem should, when in actuality, the reason they are in the condition they are is due to human activity! I actually would be ok with managing these stands a bit more aggressively, but I would want to make sure there is adequate woody debris, old trees, so-called Mother trees. I

also would want USFS to be extremely careful not to create large openings on south-facing slopes. I have seen places in Pennsylvania where openings on such slopes were created and they became dominated by invasives that were difficult or impossible to control. Better to make patches on north and east-facing slopes and maintain a closed canopy in south and west-facing slopes to avoid this problem. This phenomenon has been documented in the literature - any time there is a change in conditions; sunlight, nutrient, etc., invasives are favored, and especially on warmer sites.

Our forests might be one of our only hopes for sequestering carbon. Old trees store carbon at higher rates than younger trees; even though young trees sequester at a higher rate, the volumes are a fraction of older trees. So I urge you to scale back the forest management to those areas of the forest that have a human-induced reduction in condition or economic health, and for climate mitigation, leave the majority of the 87% of mature or old forest to do what is needed in the next several decades: store carbon.

Respectfully submitted,

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