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Organization:

Title:

Comments: I would like to provide comments and suggestions during the current official comment period ending March 13, 2023.

I've reviewed the Telephone Gap Proposed Action thoroughly, watched the video of the recent public forum in Chittenden, and talked with Jay Strand who has answered all the questions I had about the project.

I am in full support of the proposed management actions you have presented, and I believe you are on the right track in applying the provisions of the 2006 Forest Plan to this particular 32,000 acre tract of Green Mountain National Forest land. I am familiar with the Forest Plan as I participated in its development over a five year period. The land within Telephone Gap has been more or less untouched for a long period of time and is need of management. Here are some specific concerns of mine on which I make comment.

Diversity:

Currently Telephone Gap lacks the diversity of forest types and age classes to meet the goals set in the Forest Plan. Eighty seven percent of the forest is classed as mature or old. Vast acreage (93%) is in Northern Hardwoods type with relatively smaller areas of mixed softwoods and hemlock stands. These NH stands are all relatively the same age - 80 to 100+ years with very few openings or intrusions. As a result, a large proportion of Telephone Gap provides similar habitat conditions and limited opportunities for wildlife, birds and other animals. It's too much the same. You are correct in your proposal to enter these stands and change a percentage of the area to new and vibrant sun-loving species of trees and habitat which will attract animals and birds not there now. Greater diversity means you will be supporting more and varied tree species in the stand. That will ensure greater resilience to natural catastrophes and a hedge against large losses from invasive insects and diseases which tend to affect just one tree species.

To improve diversity, Telephone Gap needs more acreage of mixedwoods or softwoods to complement the hardwood stands. Where possible based on site conditions, I encourage the conversion of NH into mixedwood or softwood stands. Right now, only 7% of Telephone Gap supports these types. Wildlife habitat, especially snowshoe hare and its associated predator species, would benefit greatly. Similarly, less than 1% of Telephone Gap supports aspen-birch stands. It would be a wonderful improvement from a diversity/habitat perspective to increase the component of aspen-birch closer to 5-10% through use of clearcut patches. That would be a boon for grouse and other wildlife species.

I like your proposal to replant (oaks, white pine etc.) in clearcuts and shelterwood cuts in order to improve diversity and prepare for a future which might be warmer. This has not been a traditional approach, but could be the right prescription at this point in time.

Timber Harvest:

If I have used the conversion from CCF to MBF properly, you would expect a timber yield of

13-14 million board feet of sawlogs and 16,000 to 34,000 cords of lower quality material over the life of this project (7-10 years) based on the range of acreage you propose to harvest in Table 8.

Opportunity to harvest that much wood would be greatly welcomed by the many loggers, truckers and mills which operate in central Vermont and beyond. In your final EA proposal, I would urge you to consider an even more

aggressive approach in terms of the stand acreages you intend to treat.

Telephone Gap contains 32,000 acres of suitable lands, and of that, your inventory shows 18,000 acres are either overstocked or deteriorating. Yet you intend to treat only about 12,000 acres with both even[shy] aged and uneven-aged methods. It appears from a quick look at the data that the area to be harvested could be increased by some measure in your final plan. Such a decision would move you more quickly toward your stated objectives for age class distribution as shown in Table 4.

Timber Stand Improvement:

I support the methods you propose for TSI, including the use of glyphosate, which I have used extensively to eradicate Japanese barberry. It is really the only effective solution and I've seen no adverse impact. Other alternatives require lots of time and effort with few results. Prescribed fire is fine but is quite limited by weather conditions, and often, objectives cannot be accomplished. You are proposing TSI on 1336 acres which I support.

Economics:

Sale of national forest timber IS an important economic consideration in Telephone Gap, though some activist groups try to downplay it. Job opportunities for people in the region surrounding Telephone Gap are sorely lacking, but I do find that many younger folks in our area are attracted to working in the woods or in the associated trucking industry. We need them and Telephone Gap can help keep them in business. Beyond that, there are a half dozen mills nearby ready to process logs and firewood coming from Telephone Gap. Though considerable logging is done on private lands, the preponderance of national forest ownership in towns from Killington and Chittenden northward dictates that your final EA decision on Telephone Gap could have a substantial positive economic effect on our region. We will all welcome that. One personal concern I have, as owner of two woodlots which I actively manage, is that if GMNF ever becomes an unreliable source of timber, it would result in some loggers and truckers leaving the business and make it harder for me to find someone to harvest my own woodlands.

Old Growth/Roadless:

Standing Tree and others will try to capture the public's attention on these issues because they are complex and hard for people to understand. I appreciate your statements that Telephone Gap proposed timber harvests will not violate any of the special rules/executive orders etc. which have been put in place to manage these areas. Please emphasize that upfront in the EA which you will be preparing.

Carbon:

Here is another handy tool where your naysayers can cause confusion in the public's mind. My take is that the planned regeneration cuts, intermediate thinnings for improved growth, and TSI in non[shy] commercial stands to improve growth is bound to result in a positive carbon balance for Telephone Gap, especially since much of the timber removed will remain intact in the form of construction materials, furniture and flooring, etc. I hope you can make that clear in the upcoming EA.

You have my appreciation for all the work of inventory, analysis and presentation you have done so far.