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Comments: On behalf of the Vermont Department of Forests, Parks, and Recreation, Forests Division, I would like to thank the US Forest Service - Green Mountain National Forest for the opportunity to comment on the Telephone Gap Integrated Resource Project (IRP) and related Preliminary Environmental Assessment (PEA). As the State of Vermont entity responsible for managing and stewarding state lands and advising private landowners on forest management on lands adjacent to the Telephone Gap IRP area, we are very interested in the USFS plans for this important forest resource, as well as how the plans will impact local forest products businesses, recreational interests and opportunities, water quality, wildlife habitat, climate change resiliency, forest health, access to the forest, and invasive species management. We are also focused on how the IRP will contribute to the goals of Vermont Conservation Design and particularly goals around working towards statewide targets to manage for both young and old forests.

The PEA lays out a vision for management of the Telephone Gap forested area that balances multiple uses, promotes conservation and habitat improvement, enhances resiliency to climate change, embraces principles of ecological forestry, and is based on a robust public process. Vermont FPR supports management alternatives that will help achieve the goals of the 2017 Vermont Forest Action Plan, and especially relevant desired future conditions for our state's forests. Our principal goals in this plan are to keep Vermont's forests intact and healthy, avoid forest conversion and fragmentation, and maintain highly functioning forest lands for their ecological values, habitat and wildlife connectivity, economic contributions, and adaptive capacity during climate change.

We believe that Alternatives B, C, and D will contribute to meeting the goals of Vermont's Forest Action Plan. We do not support Alternative A as we believe that to achieve a healthy forest that can provide a range of benefit to Vermonters and visitors, active management is needed. Of the three alternatives involving some form of active forest management, we believe that Alternative C strikes the right balance between varying multiple uses, achieving the goals of Vermont Conservation Design, supporting recreational and forest products businesses, promoting ecological restoration and climate resiliency, and increasing the quality of wildlife habitat. We don't believe the greenhouse gas emission reductions associated with Alternative D are sufficient to warrant the limitations in forest management and restoration proposed in that alternative, and we think Alternative C does a better job in promoting old growth forest conditions than Alternative B, which, along with establishing early successional or young forests, is an important goal in Vermont Conservation Design.

We hope that the USFS is able to implement one of the three alternatives involving active management, preferably option C, in line with the schedule on your website with implementation beginning later this year. Thanks again for the opportunity to review this document.