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Comments: To Responsible Official Christopher Mattrick, April 6, 2024

Thank you for the opportunity to comment on the Telephone Gap IRP. I am pleased to see a landscape-scale, integrated forest restoration project proposed for my local area. With the GMNF spread over 50+ towns, and with limited staff and budgets, IRPs are a rare occurrence. Despite what some doubters may suggest, this forest landscape is in need of active intervention. Preparing the forest for climate adaptation, given an uncertain future, is a sound approach. Most of my comments (below) will focus on vegetation management activities and the current lack of habitat diversity in the project area. But first, I would like to commend your team for building a comprehensive proposal that integrates active vegetation management and habitat diversity with dam removal, road repair and maintenance, culvert replacement, recreation and scenic enhancement, hazard tree reduction, native species plantings, and much more.

Public Support:

The citizens of my town, and those in the neighboring towns of Mendon and Killington, were highly supportive of the recent acquisition of parcels that were folded into FS oversight within the Telephone Gap project area (e.g., Rolston Rest, South Pond). These forward-thinking folks voted in favor of federal acquisition of the private holdings (May 2017), despite the realization that a decrease in tax revenues would follow. Given the property tax nightmare the state now finds itself in, I question whether these citizens would be so generous of spirit if that vote was held today, only 7 years later. It might be a good stroke of business to highlight the returns to town coffers through the annual Payments in Lieu of Taxes (PILTs) that spawn from projects like this. Most voters may be unaware of the PILT program, yet it is a useful tool that helps leverage conservation gains for public lands, as these payments can help take the sting out of tax revenue losses at the local level.

A Knowledge Based Approach:

The Forest Service occupies a unique position in showcasing science-based forest restoration activities on the nation's forests. As the premier agency for managing forests, the USFS plays a leadership role in demonstrating both active and passive management methods in working to conserve, restore, and produce desired natural resource outcomes, including carbon capture and storage. This leadership role, as found in integrated management projects such as Telephone Gap, can help inform neighboring land holders about science-based approaches to improve their own degraded woods. The Forest Service, simply put, brings over a century of tangible research results, the technical expertise, and interdisciplinary experience to the task of managing our public forests.

Site-specific, ground-based data led the interdisciplinary (ID) team of professionals to study the existing conditions before designing this forest restoration project. The team gathered data, compared the conditions on the ground to the guiding forest plan desired conditions, forecast the future trends with and without intervention, and came to a reasoned conclusion for how, when and where to take action. Or no action. It is worth repeating that site-specificity is the key, although that concept is often drowned out by the rallying cries of the merely uninformed or perhaps by the passionate believers in only a singular prescription for our public lands.

Conservation is the overarching goal in this proposal, especially for scarce or dwindling habitats as found on the landscape. And conservation also means the preservation of options by not putting "all your eggs in one basket". This includes the disparate actions of retention and preservation of uncommon habitats (e.g., old growth forest), restoration of resiliency in diminished and fading ones (e.g., regeneration of aspens and yellow birches, tree

planting, stand improvement, Rx fire), and utilizing resources that are widely found (e.g., capturing dying trees before they are lost to time). Restoration forestry, for which the GMNF has long been recognized as a leader, includes identification and protection of scarce resources, maintenance and enhancement of soils, water quality, and scenic beauty, management of insect and diseases, while building resilient forest conditions that can better withstand future disturbance. And yes, climate change mitigation through sequestration of carbon and maintenance into forest sinks, as well as capture of durable wood products and bio-energy before those options are lost to time.

The Role of Monitoring:

The national forests also provide a learning laboratory of how we can live in nature and within our natural resource inheritance. And to do so in perpetuity, which is the foundation for sustainability. Preservation of scarce resources, restoration of degraded ecosystems, utilization of common (and abundant) resources. What could be a better model to showcase results across the landscape? The Telephone Gap IRP action alternatives fit within such a conservation strategy.

One concern that often escapes notice is that the GMNF has become an aging, senescent forest, with tree mortality and decay exceeding growth across much of the landscape. A casual look at Forest Inventory & Analysis (FIA) plots over the past 20 years shows this. Although carbon sinks in a decaying forest may persist for decades in the absence of disturbance, CO2 sequestration through photosynthetic capture is greatly compromised in dying trees. While this may produce good woodpecker habitat, it is not a path toward providing a diversity of habitats, nor a climate-smart approach for retaining carbon in the long term. The senescent northern hardwood forest is not a rare specimen on the GMNF. Rather, healthy stands of native oaks are scarce. There is a need to create conditions favorable for oaks and confers to thrive, as well as provide the early successional aspens and yellow birches, now greatly diminished compared to their historic distribution.

In reviewing the Story Map portion of the EA documents, I have one small suggestion for edification. Consider showing photos of active treatment methods (e.g., clearcut, shelterwood, individual tree selection, etc.), providing the observer with what these stand manipulations might look like at say, 10, 20, 50 years into the future. Earlier in my career, I was able to win over some doubters of the real benefits of active forest management when walking into healthy, vigorous pine stands and motioning to a stunned audience "[hellip] what do you notice about this clearcut we are standing in?" We natural resource professionals often trip over ourselves by allowing naysayers to dominate the conversation by inferring that forests are forever static. No, forests are dynamic systems after all, with a variety of life cycle stages that are found in all biological entities.

A Strategic Approach:

Despite the views of those who believe this IRP landscape will soldier on in good health if left alone, I must state that this area is no forest primeval. Most of the parcels that the GMNF has acquired over the decades have been disturbed lands undergoing successional reorganization following agricultural abandonment, maple tapping, or high-grade logging. They still bear the scars of those past disturbances. While some stands remain healthy and vigorous and may thrive, most IRP acres are found to be stressed northern hardwoods. Many have severely diseased beech understories caught in a seemingly endless loop of overstocking and successional dead-ends. I prefer Alternative B-Modified, as it proposes the most active management and restoration on a landscape that has seen little vegetation management in decades, yet I understand there are those who wish to see no management activities on our public lands. For that reason, any of the action alternatives will provide an opportunity to showcase restoration work on the GMNF. As it has been 30 years since the last FS vegetation management proposal for this general area, it will likely be decades before another integrated resource management opportunity comes around. There is a need to make a substantial restoration effort at the landscape scale before stepping away.

With roughly one-half of the GMNF reserved in passive management land allocations (wilderness, roadless, remote backcountry, etc.), it may be prudent to apply an active hand on those maturing forest stands where the opportunity exists and conditions fit for building resiliency. If the science is not settled on which path to take forward to ensure the long term viability of old growth*, as well as the best way to capture and store carbon, it makes sense to maintain options. Simply hoping that degraded forest stands will recover with inaction must not be the only tool that should be employed. Your project proposal is just the recipe that is needed, for this area, at this time.

Final Thoughts:

As I sit writing this letter in the dark, following the 2nd major power outage of the season, I am again reminded of one constant that threads its way through the Vermont landscape. And that is the rate of decay in our northern hardwood forests. Unlike other forest types, and probably not recognized by most weighing in on this proposal, the forests of northern New England are unique in the sheer amount of forest decay and mortality present. Simply put, Vermont's forestlands, including the GMNF, is highly vulnerable to insect and disease agents. In my leafy town, electric power is cut virtually every month, nearly always by the same culprit: decaying, dying, and toppled trees falling on power lines, often during wind events. There is no shortage of decaying forest and the public should not be subjected to these hazards around recreation sites, roadways, and trails. Decaying and dying trees have their place, but away from the people who are simply attempting to enjoy their forest. The action alternatives proposing hazard tree mitigation address this well.

Thanks again for providing the opportunity to comment and best of regards to you and your interdisciplinary team in moving this important natural resource project forward. Thank you for your dedication to a strong conservation ethic and the wise use of our public lands.

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*footnote:

In March of this year, the Society of American Foresters held a Mature and Old Growth Sciences Summit in Washington, DC, supported by the Forest Service. Over 200 people attended and represented a broad range of perspectives. The summit was designed for information/position sharing rather than providing formal comment or reaching consensus on old growth management. Nonetheless, it is instructive to learn from these discussions.

Panels focused on mature and old growth inventory, their threats, and age classes, while studying discrete carbon narratives under active and passive management scenarios. The take-away message: wildfires, insects and diseases remain the biggest threats to old growth on federal lands in the US, not forest restoration efforts or even timber harvests. This holds true for the GMNF as well. Although uncertainty remains on whether active or passive management is needed to retain old growth over long periods of time, I suggest that it will ultimately depend on the site-specific conditions at hand, and not with overly broad generalizations.