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First name: Geoffrey

Last name: Gardner

Organization:

Title:

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Coming to it for the first time, people unfamiliar with the terms, details and underlying attitudes of the debate about the proposed Integrated Resource Management Plan for Telephone Gap often have a sense of two opposing groups talking at cross purposes or past each other: the Green Mountain National Forest leaders and staff on one side and proforestry and climate forest advocates on the other. As a member of the latter group, I often do have the feeling that we are talking to one another from opposite sides of a very wide, very deep gulf with the 12,000 acres of Telephone Gap proposed for harvest as if poised perilously on a tightrope above the void far below. Some 80% of the trees within those 12,000 acres are 80 to 100 or more years old. If they're cut, they'll be lost forever. The present enormous ability of these forest stands to accumulate and store carbon, store water, provide habitat for a huge variety of species, including some that are threatened and endangered, would also be lost, simply gone and goodbye forever.

Maybe it's best to understand the gap between the parties to this debate in terms of time. The Telephone Gap plan the Forest Service has developed, proposed and is advocating for is based on the general Green Mountain National Forest Land and Resource Management plan published in 2006. This 17 year-old plan hardly mentions climate change at all. For that reason, it was out of date immediately on publication.

Between then and now a body of science, investigating and reaching conclusions about the role of forests, and especially mature and old forests, in mitigating and shielding against climate change and biodiversity loss has developed and gained support and credibility to the point that both federal and state governments, including Vermont's legislature, have adopted binding policies that 30% of land be conserved by 2030 and 50% by 2050. Almost exactly two years ago, on Earth Day 2022 and well into the development of the Telephone Gap Project plan, the Biden administration, issued Executive Order 14072 directing the U.S. Forest Service to develop rules to ensure the conservation and protection of mature and old forests specifically to benefit the climate and biodiversity. Both the federal government and Vermont state government have begun the work of rewriting their rules for forest management and protection in accord with 30 X 30/50 X 50 and Executive Order 14072. In whatever way the details of this new rule making and planning work out over the next few years, the conventional pattern of sustainable forestry set out in the now clearly obsolete Green Mountain National Forest Land and Resource Management Plan will no longer be a reliable and universal guide for managing and protecting the Green Mountain National Forest, including the forests of Telephone Gap now proposed to be cut and cut hard.

It's worthwhile to think about the divide between the Forest Service's plan for Telephone Gap and its opponents as the result of a paradigm shift between a conventional and now out of date way of thinking about forests and a new body of knowledge that envisions and supports urgent goals quite different from the conventional aims. The old way of thinking about sustainable forestry on public lands is that it serves to balance out three objectives: conservation, recreation and commercial harvest. Sustainability within this framework is thought of in terms of a 40-to-60-year cycles of harvest and new growth. The new proforestry way of thinking gives primacy to preserving and protecting mature and old forests because of their critical role in regulating our climate by accumulating and storing enormous amounts of carbon and maintaining well-functioning ecosystems that provide and sustain biodiversity and clean water and air. Within this framework of thinking time is seen in a very short term of urgency as we approach critically dangerous climate tipping points over the next 5, 10 and 15 years at the same time that we learn and think about the ecological functions and services of forests in terms of much longer periods of decades and centuries well beyond the 40 -to-60-year cycle of sustainable forestry.

The turn of government policy in the direction of requiring protection of mature and old forests and 30 X 30/50 X 50 mandates indicates increasing acceptance of the need for planning in accord with the new forest science. But this new planning is only just beginning and has not yet been formulated let alone developed and proposed. This means we're in an interim between the old paradigm on which the Telephone Gap Project plan is based and new planning that has already been required to be protective of mature and old forests. This is acknowledged to some extent by the latest version of the Telephone Gap Plan. Alternative B drops logging of some 40 acres found to be "old forest" by Vermont's Department of Fish and Wildlife. And Alternative C considers reducing logging within mature stands and dropping logging of some 660 acres now considered as "late successional" because they include 100-year-old trees and have other old growth characteristics. This alternative also recommends reducing fossil fuel use by decreasing intensity of harvest and road construction. These alternatives indicate a welcome change in the right direction, but they fall far short of meeting the urgency of the combined climate and biodiversity crisis. With respect to realizing the true potential of the Telephone Gap forests to go on developing as in-tact and self-restoring for many decades if not centuries into the future, these alternatives are little more than lip-service and a slight nod toward full protection of the mature and old forests of Telephone Gap.

What then is best to be done in Telephone Gap in this interim before pervasive new rules and planning are proposed, debated and accepted? To the huge number of people, like me, who have from the start opposed this plan and its proposal to cut one of the most extensive mature and old forests in New England, the answer is that there should be a moratorium on all cutting in Telephone Gap at least until new rules are in place in accord with Executive Order 14072 and 30 X 30/50 X 50 mandates and preferably until a new Green Mountain National Forest Land and Resource Management Plan, replacing the 2006 plan, is in place.

Does this mean nothing at all should be done with respect to Telephone Gap? I don't think so. The GMNF staff has done extraordinary work observing and describing in great detail the project area lands and forests. This work could become the baseline for a decades long research project to investigate and learn how a northern hardwood forest develops to restore itself when left alone and uncut as a climate and ecological forest reserve and wilderness area. This would most likely realize the greatest and best use of this forest with respect to the public good and as an example for public forests generally. This work could best begin as soon as possible by undertaking a full Environmental Impact Statement for Telephone Gap.