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First name: Norman

Last name: Arsenault

Organization:

Title:

Comments: Dear Chris:

Thank you for the opportunity to comment on the Preliminary Environmental Assessment for the Telephone Gap project.

First, I would like to recognize all the work you, your staff and your resource specialists have put into the formulation of this project. It appears to me to get ever more complicated and time consuming.

#### Alternative B

I've read through all the materials you have provided, asked a few questions of your staff and have gotten answers, and monitored the virtual public meeting on March 27, 2024 on Telephone Gap. After due consideration and analysis, and with sixty years of experience as a professional forester, I strongly urge you to adopt Alternative B - the Modified Proposed Action.

I believe that a diverse forest containing stands of different species and ages, and with 8-10% of forest openings, is more sustainable in the long run and will provide more habitat for more species of birds and animals. Moreover, the 2006 Forest Plan for the Green Mountain National Forest, which provides the direction for management of Telephone Gap, recognized the need for greater diversity and set goals for its accomplishment. Alternative B is the only alternative which aggressively pursues the goal of habitat diversity in a serious way.

As it stands today, Telephone Gap is not a diverse forest, and it will take years of effort to make it so. 93% of the suitable lands are of one type and one age - that being northern hardwood stands (beech, yellow birch, maple) 80-110 years old. The next largest component is 5% of mixed hardwood/softwood stands. Other species are sparse or non-existent. There are no forest openings supporting regenerating seedlings/saplings and there is no progression of age classes in pole-sized trees or small sawtimber.

This is not a sustainable model.

The various timber harvest techniques proposed in Alternative B hold the key to begin the transition to greater diversity. Even-aged management will result in new forest openings hosting a variety of new tree species (paper birch, cherries, ash, aspen) and plants. Individual tree selection cuts will improve forest quality and promote more softwood species where conditions are suitable. Intermediate thinning will remove poor-quality wood and spur growth in the remaining stand. Plantings of oak and other species suited to a warmer climate is a good step to stay ahead of the changing climate curve. A progression of young forest age classes will be established, but further work in the future will be required to keep the progression moving as time passes.

For some time I have been closely monitoring the results of research studies regarding forest diversity and resilience in a changing climate. The conclusions seem to be overwhelming that more diverse forests will be more resilient in the face of climate change and the challenge of new invasive species of all sorts finding their way to Vermont. If the maple trees in Telephone Gap were white ash, we'd be facing a catastrophe. Obviously, if 93% of your forest is made up of only 2-3 species of trees, it will be susceptible to new threats from invasives specific to those species. Some species are more susceptible to wind throw or heat, or dry conditions. Forest managers cannot prevent many of these conditions, but they can hedge their bets by undertaking measures to increase and maintain the diversity of forests they manage. In the case of Telephone Gap, Alternative B is the best option to make sure this happens.

Turning to the potential economic benefits of Alternative B, I have been annoyed by pronouncements in the press by Standing Tree. A primary goal of this organization is to stop all timber harvest on federal and state lands. They claim that only 4% of Vermont's annual harvest comes from public lands, and because that number is so small, it could be eliminated entirely with little problem. I haven't seen a rebuttal but here's one I hope the Green Mountain National Forest will bear in mind. Recent reports show the timber industry has a \$2 billion positive economic impact annually in the State of Vermont. If so, 4% represents an economic impact of \$80 million, primarily in the more rural and needy towns in the state. That is nothing to sneeze at. What proportion of the \$80 million would be contributed by Telephone Gap, I don't know. But Alternative B certainly would pose a significant contribution to businesses and employment in Vermont.

#### Alternative C

I realize that you have had many comments supporting the idea of Old Growth (OG) in Telephone Gap and you have presented Alternative C as a response. I can accept the concept of Alternative C from the standpoint of adding to age diversity as a future benefit. The fact is, your forest stand analysis (Figure 2; Page 37 of the PEA) shows approximately 4100 acres of forest stands 130 years or older already exist in Telephone Gap. They may or may not contain OG, but they are well-along. However, I have many questions about the role Telephone Gap itself should play in providing OG.

Right now I would guess there are tens of thousands of acres of developing OG, and likely some true OG, within designated Wilderness on the GMNF. Unless I missed it in the EA, I see no discussion of why there is a need for more OG elsewhere on the GMNF, such as in Telephone Gap. I realize you don't have a good inventory of stand conditions within Wilderness, which leaves us all in the dark as to how much OG there already is, how much more we "need" and what contribution should come from Telephone Gap.

Similarly, 35% (12,554 acres) of Telephone Gap contains land classed as unsuitable in the 2006 Forest Plan. Undoubtedly, some of those acres are as close to OG conditions as the 3611 acres of suitable land you propose to convert to OG. Why aren't unsuitable lands contributing to the goal of promoting OG through the same non-commercial treatments you intend to use on 464 acres of suitable lands? It's going to take decades either way, so why not target unsuitable lands as well? The Preliminary EA contains no discussion on this point. The Final EA should address the likelihood of OG or OG potential in both Wilderness (and other protected classifications) and on unsuitable acres in Telephone Gap, and permit suitable lands to be managed as intended in the 2006 Forest Plan.

Another complication I see with Alternative C is that, if selected as the Final Alternative, this EA would, in effect, be converting suitable lands to non-suitable. If the 3611 acres in Alternative C slated for late successional enhancement are actually treated as proposed, you will be removing them from the suitable land base because they will never be cut again. They will become hallowed ground. No-touch. What is the "end game" for those acres prioritized to become OG. If the thought is future periodic commercial treatment will be required to keep them on the OG path, forget it. Once you've identified and treated these stands as "special," public opinion will force your hand to place them in a protected category.

As proposed, I believe Alternative C jumps too far too fast to satisfy the clamor from certain constituencies for old growth forests now! I've never read, though it may exist, of any land management entity attempting to accelerate OG development on 3611 acres as a first attempt. What Alternative C proposes seems almost experimental. I can support the concept from the standpoint of adding to forest diversity, but I truly believe the GMNF is already on track to host thousands of acres of OG in coming decades. In lieu of Alternative C, I suggest some smaller number of acres be included in the Final EA for Old Growth enhancement on unsuitable ground as a modification of Alternative B. Subsequently, the next revision of the 2006 Forest Plan should address the entire issue with a proper inventory of all lands (including Wilderness) to start with, and a clearer perspective on long term goals.

## Alternative D

In examining Alternative D in this EA, I can only conclude there is little to be gained in terms of lessening use of fossil fuels using the measures you propose. Instead, it brings up questions of equity in my mind. Will your ski area permits be altered to ban groomers on the longest trails? Will snowmobile trails over a certain length be closed? Will the FS eliminate gravel hauling for maintenance purposes on roads longer than a set distance? Will passenger vehicles be banned on the longest GMNF roads?

Skidding logs and all the preceding uses are established activities as part of multiple use on national forests nationwide. Dropping the last sections of the longest skid roads in Telephone Gap, and thus precluding the management of harder-to-reach forest stands is a slippery slope in the wrong direction. Any gains from less fuel use would be infinitesimal. And it is likely any wood not harvested as a result of shortening skid roads in Telephone Gap will be replaced in the marketplace by wood harvested and shipped long distances to our locale. I have recently purchased Russian larch locally because cedar decking was not available. Alternative D is not worthy of further consideration.

## Carbon Cycle

87% of the forest in Telephone Gap is older than 80 years and is likely sequestering less and less carbon each year. Eventually, if left unmanaged and as older trees die, the carbon cycle will shift to one where more carbon is being released into the atmosphere than is being stored by the old trees. Through timber harvest in Alternative B the GMNF proposal will create 1800 acres of new forest openings supporting fast-growing seedling/sapling stands and increase growth rates on another 7,700 acres through selective cutting, thinnings, improvement cuts and TSI (Timber Stand Improvement). All these practices should result in a substantial increase in carbon capture and sequestration in the future.

## Wood Substitutes

Trees cut in Telephone Gap will release carbon into the atmosphere if used for firewood or other temporary purposes. However, approximately half the timber volume cut will be processed into veneer, lumber, furniture and other materials to be used in new construction of all types. The carbon in these materials will continue to be stored, likely for decades, and will not be a factor in carbon emissions for a long time. Another advantage to be considered in the overall carbon equation is that wood used in construction is produced using far less fossil fuel than steel, concrete, or plastics. Concrete, iron and steel production accounts for 27% of the world's carbon pollution, according to a Fair Planet Report.

Thus, use of wood rather than substitute materials benefits the overall carbon cycle.

## Final Thoughts

A Letter To The Editor in the most recent edition of The Herald of Randolph warns the public of the "devastation" which will be wrought on all of us due to your Preliminary Environmental Assessment for Telephone Gap. The writer speaks for Standing Trees in order to "save our public forests."

I take a different view. Since the 2006 Forest Plan was finalized, the GMNF has undertaken, and either successfully completed, or is well on the way to completing, four large area projects very similar to Telephone Gap. All aspects from initial inventory, to standards and guidelines, to harvesting methods to environmental protection measures have been basically the same as those included in Telephone Gap.

The GMNF has decades of experience monitoring and administering such projects. No significant environmental

problems have resulted previously and I have every expectation that the final Telephone Gap decision, when implemented, will be just as successful.

I hope my remarks have been helpful.