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Comments: I am writing today in strong support of the early successional habitat creation project in the Manchester Ranger District of the Green Mountain National Forest. I have been a certified wildlife biologist for over 30 years, much of that time working as a habitat biologist in various Northeastern states. As you have referenced in your published materials, early successional habitat is extremely limited in Vermont, especially southern Vermont. In fact, based on data published by the Forest Inventory and Analysis project of the Forest Service, VT has lost more than half of it's 0-20 year-old age class between 2005 (6.65% of all forestland) and 2016 (2.65% of all forestland). The need to start creating more is critical.

As you have also mentioned, there are many species of wildlife that require early successional (young forest) habitat for some stage of their life cycle. In fact, if memory serves me (and I haven't counted these in a long time), if you look at DeGraff and Rudis (1986) you will find that nearly 90% of all wildlife species listed used either seedling or sapling aged habitat during some portion of their life cycle in the White Mountains in NH. Scott Stoleson, a Forest Service researcher recently published the results of some of his research that showed even birds closely associated with mature or old-growth forests use the high insect abundance in openings of young forest for brood rearing and to prepare for migration. If you look at Vermont's state Wildlife Action Plan you will see there are 27 Species in Greatest Need of Conservation that are young forest dependent. Given the tiny percentage of young forest present within the project area, it is imperative that this, and similar projects move forward.

In addition to the benefits accrued to wildlife, there are also human benefits derived from timber sales by promoting a sustainable forest products industry from stump to truck to manufacturer to retailer. Harvesting the amount of timber in the timeframe you are proposing is a tremendous benefit to the local economy.

Finally, I'd mention the benefits of your proposal on enhancing the resiliency of the forest. Diverse forest age structure (which can only be created or maintained if young forest is created on a regular basis), is much more resilient over the long term.

I hope these comments are helpful in moving this important proposal forward.

Steve Weber

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