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Vermont House Committee on Environment and Energy

Good morning. I'm Bodo Carey and I'm grateful to speak with you about the Agency of Natural Resources' (ANR's) Worcester Range Management Unit - Long Range Plan (WRMU). I also respect the time and energy required of you to take on and understand the many complex issues that come before you.

I am a 40-year resident of Worcester, Vermont, and live in the shadow of the Worcester Range and Putnam State Forest. I taught middle school science at U-32 for 27 years including an annual Elevation Study on Hunger Mt. I've spent many hours (though recently not as many as when I was in my 30s) on the eastern side of the Worcester Range, experiencing its wildness, remoteness, wildlife, and changes resulting from various logging operations since the mid-1980s. I respect the many staff of The Agency of Natural Resources (ANR) and their dedicated work. Their ecologists, biologists, foresters, and others have collected and assembled vast amounts of data on the area. However, I see the Long Range Plan for the Worcester Range as incomplete and not addressing issues currently required to meet the future

I will discuss process, look at data presented by ANR at last week's testimony through a different lens, and offer suggestions for the future.

Process:

While well intended, the rollout of the plan was and is completely lacking public transparency. I participated in the Public Scoping process of 2020 and don't remember how I was informed of it. The Public meetings in Worcester and Stowe did not allow any public comment or questions about the management plan from the floor.

Two requests were made by the Worcester Select Board for FPR to come to an open question-and-answer select board meeting. FPR denied the invitations to attend. This request came from the town of Worcester which contains almost 50% of the WRMU land, 9,000 plus acres and many interested and concerned citizens. Both of the aforementioned situations don't exactly inspire confidence and promote the department's credibility nor seem accountable, accessible, and helpful to the public.

It was also disheartening to hear differing opinions between the ANR and Legislative counsel's views concerning the use of rules when developing long-range plans. A situation similar to the new Hunting and Trapping regulations that do not conform with Vermont State law and are now in litigation.

New Expansion Acreage of HSMA by 29%:

As defined in WRMU's Plan: Most of the newly designated Highly Sensitive Management Areas (on the second slide, light blue - dark blue is the existing HSM Natural Area) have very steep slopes, thin soils, and are easily damaged if not carefully protected. The Moss Glen Natural Area is also included in the acreage. (on the third slide, categories 1.11 A,B,C - 1.11D Moss Glen are newly designated areas, 1.8A is the existing Worcester Range Natural area - 3.0 green is the General Management Area where "Vegetation Management occurs")

The 9,651 HSM acres are largely protected by default, with their steep slopes, wet soils, ridgelines, and high elevations.

It would be expected that these areas would be off-limits to “Vegetation Management”. I have trouble accepting and take issue with such acreage being used to satisfy Vermont Conservation Design’s (VCD) old forest targets for the Northern Green Mountain biophysical region with no effort toward meeting those targets with natural community protections in the lower elevations.

Vegetation Management Numbers:

The WRMU has a 10% target for forest management and resource extraction, of which 71% occurs on the lower elevations of the wild undeveloped eastern side of the range. The majority of the timber harvests will take place in the Middlesex/Worcester 3,431-acre contiguous forest block (40% of this block’s area). This includes the newly acquired Patterson Brook Tract and its logging road infrastructure which offers the state new access to mature forests and other timber stands. Eight timber stands to be managed in this block are forest types of primarily Beech, Sugar Maple, and Yellow Birch, components of Northern Hardwood Forests. This harvest plan seems contradictory and at odds with the following statements from the plan. I quote:

“Northern hardwood forest forms the “matrix” into which all other communities in the WRMU fit. This forest type is also the most common type in Vermont. Over 6,000 acres of Northern Hardwood Forest were mapped within the WRMU, all as part of a single occurrence of very high ecological quality (A-ranked). This example is of statewide significance.”

“It is recommended that state-significant natural communities be afforded a higher level of protection than other areas of the management unit.”

Questioning The Impact on Vermont Forest Product Industry Argument:

The ANR and The Vermont Forest Product Industry lobby continue to stress the importance of timber harvests on state lands to provide important forest products to Vermonters. A 2022 USDA Forest Service Inventory of saw log volume harvests in Vermont shows only 2% coming off Vermont State Lands. By FPR's estimate, only 1 - 3% of timber sold in Vermont comes from state land. Thus, the volume coming off of the Worcester range would be a small fraction of this 2% and would not negatively impact the Vermont Forest Product Industry or jobs in the sector.

Questioning the True Intent of Vermont Conservation Design (VCD) and Act 59:

Last week you heard that the WRMU's plan is consistent with VCD. And, that the new 5,500 HSM acreage adds a significant amount towards meeting old forest targets for the region. I have to believe the intent of VCD for promoting old forest structure would include more than forest types found in areas defined by steep slopes, wet and thin fragile soils, bedrock, and ridgelines. While satisfying acreage targets, those areas of forest don't

meet the challenge of developing old forests in the matrix communities in the lower elevations. If this is the case, I have little hope for the Vt. Housing and Conservation Board's land inventory prioritizing "ecological reserve areas" (as called for in Act 59) such as the 3,431-acre contiguous forest block in Middlesex and Worcester. Much of the high-elevation HSM acreage, which includes the sub-alpine zone and Krummholz (short - twisted wood), simply can not develop old forest characteristics with large trees, abundant dead and downed wood, and natural canopy gaps.

The Future:

Vermont certainly needs both wild lands and working forests. The Worcester Range offers the state and the people of Vermont a rare opportunity to practice new conservation strategies with passive "management" in the lower elevations. For perspective, the state of New York has constitutionally protected 2.5 million acres as wild forest lands since 1894. Having the Worcester Range designated as an "ecological reserve" seems a small ask. Left alone and allowed to follow natural rewilding processes, the Worcester Range will develop into a rare area in the modern world where generations of Vermonters can experience an unspoiled area and its ecological values.

A management plan covering a span of 20 years should be up to date with its categories, and terminology and align with current legislation from its inception. The WRMU offers the opportunity to guarantee old forests and promote ecologically functioning landscapes at all elevations in perpetuity. FPR should consider a protected WRMU as a control or outlier, where in

100 years, nature's resiliency can be measured against the outcomes of human intervention. As my daughter expressed, "It's an interesting and egotistical argument, that forests and wild areas need human management in order to thrive. I'm not convinced. We are not in a climate crisis due to a lack of human intervention."