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TO: Vermont Agency of Natural Resources

FR: Michael Kellett, Executive Director, RESTORE: The North Woods

DA: February 2, 2024

RE: Worcester Range Management Unit Draft Long Range Management Plan Public Comment

These comments are submitted on behalf of RESTORE: The North Woods, a nonprofit organization with members in Vermont and across New England.

Encompassing 18,772 acres, the Worcester Range Management is the largest tract of undeveloped mountain landscape in Vermont. Because it has been minimally logged in recent decades, much of the forest is a century or more old and is regaining old-growth characteristics through proforestation. As a result, these wild forests are irreplaceable in absorbing and storing carbon to mitigate climate changes, in supporting resilience to adapt to the changing climate, in stabilizing local temperatures and moisture, in preventing soil loss and flooding, in providing clean air and water, in sustaining habitats for species needing interior habitats, and in offering outstanding wildland recreation.

The Worcester Range contains the headwaters of several streams that flow into the North Branch of the Winooski River and Wrightsville Reservoir. During the July 2023 flood, the Wrightsville Reservoir came within a foot of its spillway, which would have worsened already-heavy flooding in Montpelier. The intact forests of the Worcester Range are vital to moderate runoff and mitigate future flooding as Vermont faces the threat of increasingly extreme weather.

The draft Worcester Range Management Unit plan categorizes almost half of the Worcester Range Management Unit, or about 9,000-acres, as suitable for future logging. About 1,900-acres — 10% of the management unit — will be logged over the next twenty years. Most of this is in low-elevation forests, which are vitally important for biodiversity, control of soil erosion and runoff, and public recreational use.

The Community Resilience and Biodiversity Act, passed in 2023, sets a goal for Vermont to conserve 30% of its land by 2030, and 50% by 2050. Vermont Conservation Design, the state's plan for biodiversity protection and restoration, calls for approximately 10% of the state to be managed to recover old-growth forests and protect other vital ecosystems.

Vermont is falling far short of these goals. Today, just 3% of the state is protected from logging. Only about 1% of forests average more than 150 years old and operate under natural disturbance regimes. The Worcester Range could play a vital role in meeting Vermont's forest protection goals.

For all the reasons above, the draft Worcester Range Management Unit should be fundamentally revised. A final plan should be issued that designates the entire 19,000 acres of public land as a Natural Area, which prohibits logging and other intensive human management. Based on the legal definition, Natural Area designation would be appropriate:

“Natural Areas’ means limited areas of land which have retained their wilderness character, although not necessarily completely natural and undisturbed, or have rare or vanishing species of plant or animal life or similar features of interest which are worthy of preservation for the use of present and future residents of the state and may include unique ecological, geological, scenic, and contemplative recreational areas on state lands.”

Thank you for the opportunity to comment on the Worcester Range Management Unit Draft Long Range Management Plan.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized loop followed by a long, horizontal stroke that tapers to the right.

Michael Kellett
Executive Director
RESTORE: The North Woods
Concord, Massachusetts