

April 8, 2024

Christopher Mattrick, District Ranger
c/o Jay Strand
US Forest Service
Rochester Ranger District
99 Ranger Road
Rochester, VT 05767

Re: Telephone Gap Integrated Resource Project #60192 - Preliminary Environmental Assessment

Dear Mr. Mattrick,

Thank you for providing the opportunity to submit my comments for the Telephone Gap Integrated Resource Project Preliminary Environmental Assessment (TGIRP Preliminary EA). My family and I recreate in the Green Mountain National Forest (GMNF) on a regular basis including the TGIRP project area. The GMNF provides opportunities to enjoy solitude, visit areas with older tree stands, which are rare in Vermont, enjoy unspoiled clean headwater streams, and experience wildlife.

It is obvious a significant amount of time and work went into developing the TGIRP Preliminary EA. I appreciate that more than two Alternatives were offered and that additional analysis was performed to address an expanded list of issues and potential impacts. With this in mind, I respectfully submit the following comments concerning the TGIRP Preliminary EA.

As I stated in my Comment Letter for the TGIRP Scoping Document, there is sufficient peer reviewed literature available to the US Forest Service (USFS) concerning the biological and climate crisis that we find ourselves in. I am hopeful that the USFS recognizes that we are in fact in a crisis and that we need to take appropriate rapid actions. Alternative A is the best Alternative to protect the forests that act to absorb a significant amount of the excess carbon in our atmosphere, provide clean water, and provide protection from extreme weather events. Based on the scale of the TGIRP and the environmental impact, a full Environmental Impact Statement should be performed before issuing the final Decision Notice.

I support Alternative A for the following reasons:

- Alternative A supports and is in compliance with Executive Order 14072 “Strengthening the Nation’s Forests, Communities, and Local Economies”. Alternative A ensures no logging in areas that contain trees that are 80 years or older. Alternative A ensures the protection of areas that provide the greatest amount of opportunity for biological study, the greatest amount of biodiversity, the greatest amount of stored carbon, the highest levels of carbon storage uptake, the greatest benefits for clean water, and the highest resilience to climate change and extreme weather events.
- Alternative A will result in the lowest amount of Green House Gas (GHG) Emissions resulting from logging activities - both direct and indirect, and short and long term.

- Alternative A will require no mitigation efforts on the part of the USFS to avoid GHG emissions, impacts to water quality, impacts to any and all plants and wildlife, with a particular focus on the Northern Long-eared Bat, and avoid impacts to solitude and backcountry experiences.

The TGIRP Preliminary EA references and draws direction from the 2006 Green Mountain National Forest Land and Resource Management Plan and Amendments (collectively 2006 GMNF LRMP). This plan is well beyond its expected life of 10-15 years as required by the National Forest Management Act. And as such, it contains information and data that is out of date. Final decisions for the TGIRP should be based on “the best available science” as stated in the National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change interim guidance that is currently in effect. (Section VI., D. Using Available Information)

Thank you for allowing me to submit these comments for the TGIRP Preliminary EA.

Respectfully,
Mark Nelson
Ripton, VT