Comments on Final Environmental Assessment

for Telephone Gap Integrated Resource Project

Green Mountain National Forest (Vermont)

Jonathan Gibson, January 17, 2025

Mr. Mattrick, Mr. Strand, and GMNF staff:

I am submitting these comments, as I did for scoping and the preliminary EA, in an apparently futile effort to persuade you not to proceed with Alternative C as described in the Final EA for the Telephone Gap Integrated Resource Project. As of the deadline for comments (January 17, 2025, 11:59:59 pm EST), it is still not too late to cancel this project and let the TGIRP project area remain in a natural state until the vision for a different future can be advanced.

You have had an opportunity during the Biden-Harris Administration to propose a first-in-the-nation “National Climate Reserve Forest”. It is tragic that you have not seized that opportunity. We’re certain to see in the successor Administration an extreme disavowal of the climate crisis and an aggressive adoption of policies that will increase US carbon dioxide emissions. Instead of a farsighted and hope-giving example of land stewardship, your removal of old and mature trees will ally you with those who devalue and destroy our priceless natural resources and the ecological services they provide.

I explicitly ask that both of my previous comments in this NEPA process (“Jonathan Gibson” of March 13, 2023 and April 6. 2024) be incorporated by this reference and included and considered in full by reviewing USFS personnel as an integral part of this January 17, 2025 comment.

It is of course difficult to assign proper weighting in agency decision-making to public preferences relative to professional judgment based on best science. But it seems to me that you have largely disregarded the public input urging you to abandon or significantly reduce the logging of mature and old forest in TGIRP. Yes, some “environmental” groups have endorsed Alternative C, but their supportive staff are vastly outnumbered by the individual citizens who, with no organizational interests to maintain, have implored you to adopt the “no-action” Alternative A and/or to undertake a meaningful assessment of other alternatives.

You have provided zero assessment, for example, of designating a sizable portion of the TGIRP area as a research or demonstration forest for climate-focused forestry or for wildland or wilderness status to provide the restorative value of nature that we so badly need in this era of artificial “intelligence” and 24-7 noise and stress. This failure to consider one or more entirely reasonable alternatives to the triad of commercial logging options you set forth is the most egregious of your NEPA violations.

This failure to consider alternatives is most obvious in the minimal changes from Preliminary to Final EA in the total and harvest acreages for Alternatives B, C, and D (as shown in Appendix C for B at C1-6 and C7-11, for C at C14-19 and 19-25, and D at C26-31 and 31-36). The paucity of change is perfectly captured in the “04, Summary of Changes from Preliminary EA” PDF on your website. There are only 10 changes in total; five (attached hereto) are “New Mitigation Measures” which are all positive but of marginal impact in terms of the scope of commercial operation, disturbance, and removal of trees.

I found it difficult in reviewing the Final EA documents to get a sense of what will actually be happening in a given stand when a variety of practices may occur. To what extent do Non-Commercial (snags/CWD), TSI, Forest Carbon Enhancement, Climate Adaption Planting (oak), and Mechanical, etc. operations occur in the same stands as Timber Harvest? Absence of some visual overlay or tabular listing showing the location and scope of these various activities impedes public input and is an obvious shortcoming of the Assessment.

There are a few other comments I want to make in addition to the principal concerns and objections I have expressed above:

* Thank you for the 8-page Updated Carbon Analysis Methodology, the 46-page Forest Carbon Assessment, and Appendix G which provide useful information of current concepts in the field of climate science.
* I do not, however, find a calculation of the amount of cumulative long-term (20, 40, 60, 80, 100 years) loss of carbon storage that will occur over the life of TGIRP from removal of mature and old trees if all of the proposed stand treatments occur and how these losses compare to sequestration of carbon that will accrue as successional forest growth occurs.
* Nor do I find projections or calculations for the amount of loss offsetting carbon storage in harvested wood products (HWP) from TGIRP, nor estimation of how much carbon will be lost from near-term burning of wood in residential, institutional, or centralized bio-energy facilities.
* I do not see sufficient analysis of the effects of the proposed timber removals on soil micro-organisms, fungal networks that support woody and herbaceous plants, soil quality and water retention capacity, etc.
* Justification is not provided for an emphasis on red spruce regeneration. Is this based on estimates of the distribution of spruce in pre-settlement forests? Does it take into account impacts on spruce of climate change?
* Why, in contrast, are only “mapped” or “State-significant” rich northern hardwood stands given special attention? Wouldn’t all such RNH communities, mapped or otherwise, be deserving of protection, both those currently present and those likely to emerge if mature forests are left to develop such characteristics?
* Finally, I do not think the EA provides adequate justification for under-taking silvicultural operations at this time in the Pittenden Inventoried Roadless Area, nor does it consider any Alternative to the harvest operations that are proposed.

As I finalized my comments this afternoon, a pileated woodpecker flew by outside. Its presence seemed to say, “You don’t see me often, there aren’t so many of my kind, but you know large old and decaying trees sustain me. Can you do anything to keep them?” I’m trying, my friend, I’m trying…. jcg

Attachment to Gibson Testimony

TGIRP, January 17, 2025

Summary of Changes from Preliminary EA

New Mitigation Measure - Ecology and Habitat, Rich Norther Hardwoods 3: Mapped

State-significant rich northern hardwood communities identified within stands

proposed for harvest will be harvested with the least intensive silvicultural methods

determined by site specific conditions including shelterwood with reserves, single tree

selection, group selection (or their modified harvest methods as described in

(continue attachment below)

Alternatives C and D), irregular shelterwood – continuous cover, commercial thinning,

improvement cutting, variable density thinning, or crown release-snag creation/down

wood enhancement.

New Mitigation Measure - Ecology and Habitat, Late Successional Forest 4: During

layout of stands proposed for harvest, stands identified to have more than 12 live trees

per acre greater than 20 inches diameter breast height (DBH), more than 16 dead and

down trees per acre greater than 20 inches DBH, and more than 8 standing dead trees

per acre greater than 20 inches DBH will be deferred from harvest activities.

New Mitigation Measure - Soil and Water, Protection of Private Property 1:

Compartment 137, Stands 22 and 24 would be reviewed by Forest soil and hydrology

staff during harvest unit layout to avoid harvesting potentially unstable slopes and

sensitive soils which could result in excessive water runoff to adjacent private property.

New Mitigation Measure - Soil and Water, General 2: Compartment 137, Stand 24

would be reviewed by Forest soil staff prior to harvest unit layout to avoid harvesting

potentially unstable slopes.

New Mitigation Measure - General 1: Compartment 137, Stands 9, 14, 19, 22, 24 would

be implemented with patch clearcuts 3-10 acres in size (summing to the same total

harvest acreage as proposed in Alternatives B, C, and D).