Data Submitted (UTC 11): 3/7/2023 5:00:00 AM
First name: Mark
Last name: Nelson
Organization:
Title:
Comments: Dear Mr. Mattrick,

Please find attached my Comment Letter for the Telephone Gap Integrated Resource Project Proposed Action.

Thank you,

Mark Nelson

Thank you for providing the opportunity to submit my comments and objections to the Telephone Gap Integrated Resource Project (TGIRP) Proposed Action. My name is Mark Nelson and I live in Ripton, VT. 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. I am actively engaged in forest and water protection in Vermont through my engagement with multiple organizations and I am the Board Chair for Standing Trees. There is sufficient peer reviewed literature available to the US Forest Service (USFS) concerning the biological and climate crisis that we find ourselves in and I would hope that the USFS is in agreement with that we are in fact in a crisis and that we need to take appropriate rapid actions to protect the forests that act to absorb a significant amount of the excess carbon in our atmosphere, provide clean water, and protection from extreme weather events. I respectfully submit the following comments and concerns about the TGIRP Proposed Action and ask that all of my concerns be addressed in the appropriate environmental analysis for this project following National Environmental Policy Act (NEPA) guidelines.

Issue: Reliance on the 2006 Green Mountain National Forest Land and Resource Management Plan. Comment: The TGIRP, along with several other recently approved GMNF projects, 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 it's 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 And as such, it contains information and data that is out of date. Using out of date information and data can lead to incorrect decisions that have long-range and long-term impact on the climate, the environment and society.

Concern: The environmental analysis and any 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)

Issue: Non-compliance with Executive Order 14072 "Strengthening the Nation's Forests, Communities, and Local Economies" and proposed logging actions in areas with old and mature trees. Comment: The TGIRP Proposed Action does not mention or reference Executive Order 14072 that was effective April 22, 2022. This Executive Order recognizes the signi?cance of forests on Federal lands to the health, prosperity, and resilience of communities and the importance of these forests to provide clean air and water and their essential role in combating the biodiversity and climate change crisis that we face. The Executive Order commi3ed to "[hellip] managing forests on Federal lands, which include mature and old-growth forests, to promote health and resilience; retain and enhance carbon storage; conserve biodiversity; mitigate the risk of wild?res; enhance climate reliance; enable subsistence and cultural uses; provide outdoor recreational opportunities; and promote sustainable economic development." (Executive Order 14072, Sec. 2) A signi?cant amount of the proposed logging is in areas that contain trees greater than 80 years old, with some areas containing trees greater than

100 years old (USDA TGIRP Stand Age Class Map). These areas 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 bene?ts for clean water, and the highest resilience to climate change and extreme weather events.

Concern: The environmental analysis and any decisions for the TGIRP must follow the directions of Executive Order 14072 and must limit logging activities near and within areas that contain trees 80+ years old.

Issue: Compliance with the Council on Environmental Quality "National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change" and Quantifying the TGIRP Greenhouse Gas (GHG) Emissions.

Comment: Sections IV and V of the National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change interim guidance provide clear guidance for disclosing and considering the reasonably foreseeable e?ects of proposed actions including the extent to which a proposed action and its reasonable alternatives (including the no action alternative) would result in reasonably foreseeable GHG emissions that contribute to climate change and the importance of considering mitigation actions, climate resilience and adaptation. Concerns: The environmental analysis and any decisions for the TGIRP must follow the guidance and requirements in the National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change interim guidance speci?cally the sections referenced below.

* IV. A. Quantifying a Proposed Action's GHG Emissions - In the past, the US Forest Service (USFS) has made statements that emissions from a proposed action or its alternatives represent only a small fraction of global or domestic emissions. This evades the fact that any and all of the actions have a cumulative impact on GHG emissions. For the TGIRP, the direct and indirect GHG emissions, by pollutant and by total CO2 equivalent, the carbon released from plants and soils during logging, the GHG emissions from the logging equipment, the GHG emissions from the transportation of the logs to the point of manufacturing, the GHG emissions resulting from the manufacturing and distribution of the end products, and the GHG emissions released from any burning of the logging products such as biomass must be quanti?ed and available to the public. In addition the amount of stored carbon released from the logging activities plus the loss of the future carbon storage of the trees logged must be compared to the amount of carbon that will be stored by the regrowth and the carbon de?cit, in GHG equivalent amounts and time.

* IV. B. Disclosing and Providing Context for a Proposed Action's GHG Emissions and Climate E?ects - The TGIRP analysis must disclose the social cost of GHG (SC-GHG) by individual type of GHG and must disclose the real world e?ects of increased GHG's on the local population as required in this section. Due to the fact that logs from these logging activities will be transported and used well beyond the logging locations, this analysis must included the population that will be impacted by the release of GHGs from the processing and manufacturing of wood products as well as any and all burning of biomass.

* IV. C. Reasonable Alternatives - In the past, the USFS has not provided a "range of reasonable alternatives" as called upon by NEPA in the environmental analysis of GMNF plans. In many cases, the public was presented with only one alternative - No Action. This does not seem to meet the spirit of NEPA and the TGIRP analysis should include several reasonable alternatives that will provide ranges of actions between the project proposal and no action.

* IV. D. Baseline for Considering Environmental E?ects - The TGIRP analysis must be based on current carbon assessments and current conditions of the GMNF. The data in the 2006 GMNF LRMP and the forest carbon assessments that have been used for past project actions are outdated and inadequate. Given the urgency of accurately addressing the biological and climate crisis and assessing the impact of a project the size of the TGIRP, it requires that the USFS utilize more recent and current data and science that is available to them.

* IV. E. Direct and Indirect E?ects - The TGIRP analysis must include the "direct" and "indirect" e?ects of the proposed logging actions. These direct and indirect e?ects should include the GHG emissions related to the logging activities, the GHG emissions related to the transportation of the logs for processing, the GHG emissions related to the processing of the logs into wood products or biomass, the GHG emissions related to burning of any biomass.

* IV. F. Cumulative E?ects - Cumulative e?ects analysis for the TGIRP project must include the GHG emissions from all other approved GMNF logging plans, as well as the White Mountain National Forest (WNF) logging plans due to their proximity to the population that will be impacted by these actions, in order to provide the public with a clear understanding of this action and other actions. The cumulative e?ects include the direct and indirect GHG emissions, by pollutant and by total CO2 equivalent, the carbon released from plants and soils during logging, the GHG emissions from the logging equipment, the GHG emissions from the transportation of the logs to the point of manufacturing, the GHG emissions resulting from the manufacturing and distribution of the end products, and the GHG emissions and other particulates released from any burning of the logging products such as biomass. In addition the amount of stored carbon released from the logging activities plus the loss of the future carbon storage of the trees logged must be compared to the amount of carbon that will be stored by the regrowth and the carbon de?cit, in GHG equivalent amounts and time.

* IV. G. Short- and Long-Term E?ects - The lifetime for logging activities like those proposed for the TGIRP will go well beyond the end of the logging activities. For example, the expected lifetime of a tree should be taken into consideration when analyzing the additional carbon uptake that would occur if the tree was not cut. This is to be compared to the amount of carbon uptake that occurs from the trees that replace those that were cut and the amount of time it will take to replace the carbon sequestration that was lost from the tree that was cut. The analysis will di?er by stand age.
* IV. H. Mitigation - The TGIRP environmental analysis should include mitigating measures that will be undertaken by 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.

* IV. I. Special Considerations for Biological GHG Sources and Sinks - Logging activities have multiple and signi?cant impacts on carbon storage and GHG emissions. The impacts are both immediate and long term. In the past, the USFS provided insu?cient analysis of these impacts and must include assessments of the carbon and GHG impacts from the logging activity - all plant life, soil disturbance and water impacts, loss of additional carbon uptake from trees that have been logged, amount of time required to replace the stored carbon and the additional carbon that was being accumulated, GHG emissions from the logging activities, transportation of the logs, manufacturing of wood products, and biogenic impacts of any biomass resulting from the logs extracted from this project.

* V. A. A?ected Environment - It is important that the TGIRP analysis recognize that the a?ected environment goes well beyond the project boundaries. The loss and release of stored carbon, the loss of future stored carbon, and the GHG emissions released during the logging, transportation, manufacturing and burning of any biomass, as well as impacts to headwater streams which feed important watersheds have regional and national impacts.

* V. B. E?ects - The TGIRP must identify how the logging activities will impact human communities, especially any communities that will be disproportionately impacted. Impacted communities go well beyond the project boundaries. Loss of carbon storage and sequestration, GHG emissions from the project, impacts to headwaters that feed watersheds, and GHG and particulate emissions from burning of any wood products from this project are regional in nature at the least.

* V. C. Using Available Assessments and Scenarios To Assess Present and Future Impacts - The USFS

continues to use the GMNF 2006 LRMP as it's guide for projects such as the TGIRP. The 2006 GMNF LRMP, and it's Amendments, are out dated and do not recognize current science related to areas such as forest health, carbon storage and sequestration, water quality, the importance of older and mature forests, and the Northern Long-eared Bat, to name a few. The USFS should consider as an alternative to halt the TGIRP until the 2006 GMNF LRMP is amended and to allow for more recent forest health and carbon assessments of the GMNF.

* V. D. Resilience and Adaptation - Information in the 2006 GMNF LRMP related to increasing sea level, water quality, drought, high intensity precipitation events, increased ?re risk, or ecological change, climate resilience and adaptation, as well as identification and recognition of impacted communities is out of date. The USFS should consider as an alternative to halt the TGIRP until the 2006 GMNF LRMP is amended and to allow for more recent forest health and carbon assessments of the GMNF.

Issue: Alternatives that will be considered as part of the environmental analysis. Comment: In the past, the USFS has not o?ered a "range of reasonable alternatives" when conducting environmental analysis.

Concern: The USFS should o?er more than one alternative. I would suggest the USFS consider these two alternatives:

1. Pause the TGIRP until the 2006 GMNF LRMP is Amended to include and address (1) current biological, climate, environmental, forest health, water, weather, and social equity conditions, data and science, (2) ensure proper protection for the recently uplisted Northern Long-eared Bat, (3) remove the unscientific emphasis on the need for additional Early Successional Habitat which is inconsistent with the natural state of forests in Vermont prior to colonial se3lement.
2. Amend the TGIRP to (1) remove any and all logging of trees 70 years or older to allow those sections of the forest to begin returning to a state of old growth, and (2) practice silvicultural practices in all other areas that will create and mimic old growth characteristics, boost carbon storage and improve forest health. Guidance on such silvicultural practices are widely available from the University of Vermont Rubinstein School of Environmental and Natural Resources.