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Title:

Comments: My comment letter stating strong opposition to the TGIRP proposal is enclosed.

I am writing to express my strong opposition to the proposed Telephone Gap Integrated Resource project. The reasons for opposing this proposal are manyfold, but I will focus on a few that come to the forefront for me. I have broken down my comments into two sub categories: Timber Management and Recreation.

Timber Management

1. The Green Mountain National Forest Plan is outdated. It was last revised in 2006. The ensuing 17 years have produced vast changes in science and public opinion. Scientists now inform us that we have less than 7 years to radically change our ways to avoid irreversible negative effects of Global Warming and the consequent Climate Catastrophe. There is a growing national push to keep forests on public lands protected as a strategic carbon reserve that is allowed to grow old and sequester carbon indefinitely and let private lands cover timber needs. The GMNF Forest Plan MUST be amended to do this as much as possible.

1. I realize that Vermont's forest products industry generates an annual economic output of \$1.4 billion and supports 10,500 jobs however I strongly believe that logging on private lands can fully support both. If the Forest Service (FS) is concerned about loggers losing their jobs how about my husband and I not having any work as Nordic ski instructors in January and February due to lack of snow which no doubt is a result of climate change? Has the FS assessed how many other winter seasonal jobs will be lost in Vermont due to Global warming? As a Goshen resident I have been witnessing, with sadness, how a land owner clear cuts and employs other forest management treatments on his land that borders the GMNF. As a member of the public I have no control of what is happening on private lands but I can and will voice my opposition to timber harvest treatments in my, my children's and grandchildren's National Forest.

1. It is undeniable that forests serve as carbon reserves. I have been working with highly respected in the field carbon experts at Woodwell Climate Research Center to assess aboveground carbon stocks within the proposed action stands. Though the final numbers from the study are pending it is clear that the proposed timber harvest treatments will result in a loss of hundreds of thousands of metric tons of carbon storage. To put it in perspective we are talking about carbon amount that equals to the annual emissions of all passenger cars in Vermont! I have heard from the Forest Service officials that the FS plans to study how what's proposed would impact forest carbon before making a decision about the project. I hope that this time the FS would not rely on agenda driven science but rather would use new scientific evidence and developed by the experts methodology. As a scientist myself I find it ethically unacceptable to cherry pick data that justifies the proposed action and ignore findings that oppose it.

Recreation

The FS continues to use piecemeal approach to development of recreational opportunities without assessing a cumulative impact of the proposed actions on wildlife, vegetation, soil and visitors' experience. The bigger picture is that the GMNF Forest Plan does not address the build-out of huts and extensive mountain bike networks. It appears there are no master plans for either the VHA or the Velomont Trail. Without an actual plan moving forward with the proposed activities in the TGIRP is premature.

* The VHA master plan should also address how the public can reserve a hut on National Forest lands. The current system in place has the appearance of great disparity to those that are not members. Allowing VHA

members early access to reservations to the two current huts of NFS lands is wrong! No one should have to pay a membership fee to an organization in order to get early reservation access. The VHA may [Isquo]own[rsquo] the hut but let[rsquo]s not forget that public funds were used to construct those huts and they sit wholly on public lands. The GMNF should be taking a deeper dive into recent reservations. Examine how many dates were secured by members during their week of early access versus how many dates/weekends were then left open to the general public.

* Contrary to reservations per bed in other hut systems (for example, the AMC[rsquo]s huts in the White Mountains) the VHA allows to reserve an entire hut regardless of how many people actually stay there. Based on VHA[rsquo]s own visitor monitoring data an average size of a party is 6 guests per reservation meaning that remaining 4 beds remain unoccupied depriving members of the public of opportunities to reserve a bed during high demand times. Basically VHA[rsquo]s huts operate as AirBNBs which is an unacceptable practice for a lodging on public lands.

* The size and cost of these huts needs to be factored as well. Construction cost of \$290K/hut continues to shock people. Depending on a source, median house value in Addison county ranges between \$219-257K in 2022 meaning that over 50% of Addison County residents live in houses valued lower than the proposed "hut". Everyone who has recently visited the Grout Pond in Stratton has noticed a huge "hut". The exact same design was proposed for the Silver Lake location and is now being proposed for the South Pond location. Once again, a need for such an expensive luxurious lodging is not justifiable.

In conclusion, the TGIRP is in direct conflict with the FS[rsquo]s mission: [ldquo]Caring for the Land and Serving People[rdquo] and should not be implemented.

Thank you for the opportunity to comment on the proposed Telephone Gap Integrated Resource Project within the Green Mountain National Forest.