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Title:

Comments: Dear Christopher Mattrick and Staff,

I appreciate the long and arduous work all of your staff have done over the past year to comb through 1600 comments by the public about what they want to see happen on the Telephone Gap Integrated Resource NF publicly owned lands as well your attempts to augment the original plan with some measure of these requests in your presented alternatives. It indeed shows good faith that the GMNFS is taking public concerns under serious consideration in their project decisions. However there are important issues at hand with this project that have not been addressed to date.

Alternative option A is the only alternative to be chosen for the Telephone Gap GMNF area for the following reasons alone. All other alternative options, and original proposal now Alternative B, are not inclusive of the requirements of Executive Order 14072 in Region 9 and its mandatory elevated review process of projects proposing logging on mature and old growth national lands. Additionally you are not excluding from logging the very mature and old growth trees you found in Region 9 inventory when applying the federal order criteria for mature and old growth. You are still planning to include those stands in logging. Lastly, but crucially significant, every project alternative other than A is based upon treatments, prescriptions, forestry methodology orientation and age and species composition objectives from a nearly two decade old GMNF 2006 forest plan. This is not in any way up to date on the ever rapidly changing scientific information about US forests and their place in the changing climate - from carbon, to biodiversity, natural processes vs active management, etc.

Thus my comment, and further specifics below, are resoundingly opposed to any action being taken on Telephone Gap NF land until a) a totally revised and updated forest plan is in place and operational b) Executive order 14072 is incorporated and aligned completely with every step of any actions proposed to be taken on Telephone Gap and other GMNF lands. I will express that opposition to any finding other than Alternative A that you decide upon in the coming weeks and months.

I deeply appreciate that Jay and others shared the sentiment that your hands are tied in bringing your forest plan to its designated time of total revision (15 years of which you are beyond) as federal monies allocated for such revision are being handed to Western NF lands over Eastern NF lands. However the fact that any logging or other management disturbance projects on national lands would go forward with totally outdated methodologies is absurd. Would we feel confident with any fire department telling us that all their equipment and methods are completely out-dated but they are still fully prepared to meet any emergency situation? No. Likewise with any medical facility or public works. Entities cease their service until the essential updates can be made that intricately inform every step of action to be taken. Until that time the bare minimum of up-keep to existing management tasks (i.e cutting small trees near communities and structures, decommissioning roads and upgrading culverts, thinning plantations, removing single trees posing danger in specific recreation areas) should be all that is attended to. This obviously could parlay into a deep discussion of how NF personnel are to maintain equitable employment with an agency that cannot afford to update its essential operating foundation and redefine job descriptions in a radically changing climate. I truly empathize with the GMNF feeling a need to contract commercial logging in order to put some pocket change into the agency's district pants. I would propose that since other NGO organizations seem to offer funds for various activities under GMNF domain (i.e. Ducks Unlimited for culverts as example given in 3/27/24 information session) that perhaps such assisted funding can be found to update the forest management plan.

As was stated in that information session you are seeking comment that is not general, rather specific to the EA and development of the 3 new alternatives. At the risk of allowing the above statements to disqualify your

attention to my comment with the assertion that what I point out is not relevant to what you are seeking, I will provide comment below that is specific to my points based on your document. I assume in asking for specificity you anticipate receiving lengthy comments.

You state in document Preliminary Environmental Assessment for 30-day Comment under Climate Change

"Management activities that increase resilience and adaptive capacity to climate change help meet the broad Forest Plan goal of maintaining and restoring the quality, amount, and distribution of habitats across the forest to support diverse and sustainable plant and animal populations (Forest Plan, Goal 2, p. 10). Healthy and diverse ecosystems are more adaptive to changing conditions and mitigate climate related effects. Adaptation relates to maximizing the resistance, resilience, and transition of forested"

"There is no habitat diversity in the current forest and the health of the forest is declining."

What supports these assertions other than Goal 2 of the outdated 2006 Forest Plan? What up to the minute evidence are you assessing such management activities on? What metrics model from what part of forest history do you base the diverse and sustainable plant and animal populations you plan to restore? What gives ground to the assumption that the GMNF is unhealthy, nonresistant, non resilient and in need of being manipulated due to fear of predicted changes? You continually focus on uneven age classes of trees not meeting your composition objectives of the HMU. Again other than the outdated 2006 forest plan, what are these statements of need based upon? The assumption that the regrown forest, post agriculture bonanza, is not doing exactly what a forest needs to be doing in preparing itself for what is to come climatically is anthropocentric hubris.

The massive manipulation of the Telephone Gap acreage you are proposing is perplexing. You claim that early successional habitat areas are too minimal, hardwoods too abundant, softwoods too minimal, oaks and aspens too minimal, exotic species and insects too abundant, stump sprouted beech trees too abundant, open land game and non-native species too sparse, late successional mature and old growth forests negligible. Therefore you pose these reasons as being valid for extensive logging including clear-cuts, forced reduction/suppression of some species, introduction of other presumed useful species (ones desirous for logging, i.e. oak), simulating disturbance events via fire and other kill treatments, and vast glyphosate herbicide applications on 22,935 acres of land.

However, exactly what you plan on managing for, out of fear of forests being ruined due to climate change, is exactly what would happen in natural processes over all the acreage if the forest were left uninterrupted. Varied age classes, along with vertical and horizontal features supporting biodiversity, would establish themselves when stands of trees become affected by insects and weather events. The correct species for the correct stage of natural succession and resilience will occur. Natural openings in the canopy would allow species needing such conditions to establish, species of plants and animals that need open spaces would find those available as the forest presides naturally over the eventual changes due to disturbance events that result in death and decomposition. Over 40 years of use of herbicides and/or pesticides on NF lands have not eradicated invasive plant or insect species. Each logging project only increases the percentage of such invasives proliferating, as your own evidence has confirmed.

Adaptation and mitigation capacity of wildland forests in the northeastern United States -
ScienceDirect<https://www.sciencedirect.com/science/article/abs/pii/S0378112723003791>

This all begs the question are you attempting to manage the forest for the forests health and its vitally critical ecological role as air, water, and weather control agent in coming climate crises times or are you managing for the myriad of human interests from hunters to anglers to logging contracts to recreationalists to aesthetic seekers to Department of Agriculture funding sources requiring some kind of active manipulation? If your true concern were the forest one might expect to see a project designed to carefully create small acres of early successional

habitat in key locations for those species that need them and then maintaining that early habitat throughout the years, rather than using this habitat creation as a veiled way of enabling another logging project to commercially fell the trees in 10-30 years. True concern for the forest itself would leave the maturing and old age forest to its natural successional processes, including insect infestations and disturbance events, without any intervention, as natural age and composition range will result from that hands-off method. Rather what we see in your proposals is that in your modified alternatives you are still focused on aggressive manipulations even in mature stands by girdling and felling trees to "imitate" natural processes by forcing a premature death process to create natural forest attributes such as snags and woody debris on your vastly accelerated time frame.

You state under 2.2.1 Forest Habitat and Timber Resources

".... No old growth forests as defined by the Forest Plan or Vermont state-designated old forests are proposed for harvest."

Where are the Region 9 Executive Order 14072 definitions of mature and old growth in this statement for alternative B,C and D?

You state under 2.4 Alternative D

"Direct fossil fuel emissions from timber harvest include felling, processing, skidding/forwarding, loading, and hauling. Emissions from these sources increase proportionally with the amount of wood harvested. Skidding and forwarding emissions also increase as a function of the average distances that logs must be transported from harvested stands to the landing. By reducing the average skidding distances and reducing the amount of wood harvested, fossil fuel emissions can be reduced."

This admission of detrimental carbon emissions due to the very processes you are proposing to undertake in the forest is again a perplexity. Your claim that wood products need to come from our forests to stop dependency on geographically distant harvested forests is unfounded. When loggers on previous projects have been stopped along logging roads to inquire where their loads are headed, they have invariably said "Canada" time and time again. That you know well the cost in soil damage, ecosystem degradation, carbon emissions, habitat fragmentation, spread of invasive species and water systems functionality issues from logging and still persist in trying to convince the public that timber harvest on public lands is essential is ambiguous to say the least.

We know that many of the trees in the proposed project acreage are 80 years and older. The forest has been rapidly accumulating carbon and could store two to four times more carbon if allowed to grow old undisturbed. The project area is habitat for imperiled and sensitive species that depend on large unfragmented landscapes to thrive. Natural processes of creating age and composition variation will allow these species to continue to live.

In closing these inquiries and comment I stand strong with Williams Berry's quote "We cannot know what we are doing until we know what nature would be doing if we were doing nothing." I ask that you please choose Alternative A to find out what you are doing. Thank you for your consideration.