

Data Submitted (UTC 11): 4/8/2024 4:00:00 AM

First name: Elizabeth

Last name: Bancroft

Organization:

Title:

Comments: Thank you for the opportunity to comment again. I believe that this project is large and important enough that the US Forest Service should produce an Environmental Impact Statement to determine the true significance of its proposed management actions in the Telephone Gap landscape. The current Environmental Assessment is not sufficient, as evidenced by your new plan not being substantially updated from your last one.

I especially encourage the Forest Service to select Alternative A, No Action, and therefore stop all plans for logging in the Telephone Gap area. We need these forests to support biodiversity, manage increasing precipitation flowing downstream and sequester significant amounts of carbon, all to mitigate future threats as well as ensure healthy ecologies. At the very least, please do continue to develop Alternatives C and D to lower intensity of timber harvest and reduce road construction in the project area. The more you can scale back the timber harvest, the better the plan will be.

Specifically, the Telephone Gap plan's stated goal is to "Manage at least 5 percent of each ecological type for old growth characteristics." This does not go any where near far enough, especially in light of both global/federal initiatives to conserve at least 30% of land and President Biden's Executive Order on conserving mature and old growth forests. Your plan states that "Old growth conditions are also rare on the Forest." but most of it very much fits the definition of mature forests. Indeed, Table 3 indicates 10,650 acres of old forest as well as thousands of acres of mature forest, none of which should be touched.

Please protect ALL mature stands of forest over the age of 80 in the Telephone Gap landscape and across the entire Green Mountain National Forest, which will have the added benefit of helping to protect important habitat for the endangered Northern long-eared bat. Please stop all logging in all Inventoried Roadless Areas of the Telephone Gap project, including the 16,000-acre Pittenden Inventoried Roadless Area.

At this time, it is most essential for us to protect un-fragmented wildlife habitat and clean water, and defend downstream communities from flooding. We must sequester as much carbon as possible, and forests such as these in Vermont are some of the most potent and important places to conserve. There are enough resources on private land to provide building materials for increased housing, and biomass energy is not sustainable and should be phased out in favor of truly regenerative strategies. Please see the attached study on Proforestation.

Sincerely,

Elizabeth Bancroft