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Comments: See Comments attached:

The Telephone Gap timber sale has been called one of the ten worst projects in the U.S. by Climate Forests, a national coalition of 120 environmental groups. This highly destructive logging job would devastate an area larger than the entire City of Burlington. It endangers the water quality of the White River and Otter Creek, risks introducing invasive species, and destroys habitat needed by threatened and endangered wildlife.

The Green Mountain National Forest (GMNF) notes that "Old growth conditions are...rare on the Forest... Stands that have generally remained unmanaged since land abandonment have the greatest potential to develop old growth conditions over the next 100 years" (TGIRP Landscape Assessment at p11). The Telephone Gap project has a high concentration of forests that date back to agricultural abandonment in the late 1800s to early 1900s. This is exactly the sort of landscape where we should put forests on a path to old-growth recovery.

If the GMNF's proposal moves forward, this project would bring the total amount of land recently approved for logging on the Green Mountain National Forest to around 50,000-acres, an exponential increase over the past few decades.

In early 2023, 1,600-people commented on the Telephone Gap logging project and more than 13,000 people signed a petition in opposition to the GMNF's plans. Is public participation merely a checkbox on the way to doing what you want ?

1. The Green Mountain National Forest (GMNF) must produce a much more rigorous Environmental Impact Statement to determine the significance of its proposed management actions in the Telephone Gap landscape. An Environmental Assessment doesn't "cut it" with so much at stake.
2. I encourage the GMNF to select Alternative A, No Action, which would allow the forests of the Telephone Gap landscape to continue to grow old for the benefit of biodiversity and the climate.
3. Although Alternatives C and D are a step in the right direction, they don't go nearly far enough to honor the intent of President Biden's Executive Order on conserving mature and old-growth forests. I ask the GMNF to protect ALL MATURE STANDS 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.
4. I call for an end to logging in all Inventoried Roadless Areas, including the 16,000-acre Pittenden Inventoried Roadless Area in the Telephone Gap project area, to protect un-fragmented wildlife habitat and clean water, and defend downstream communities from flooding.

Sadly, very little has changed to the Telephone Gap timber harvest proposal since the January 2023 Proposed Action. The Forest Service's Modified Proposed Action, also called Alternative B in the draft Environmental Assessment, has dropped approximately 40-acres of proposed logging because it was identified as "old-forest" by Vermont Fish and Wildlife. While I am grateful when any forest is spared the saw, such small changes simply aren't going to be adequate in the face of climate change and extinction.

I applaud the concepts that are considered in both C and D alternatives. However, I am disappointed that these changes are only being considered across a relatively small portion of the project area and have not yet been incorporated into the Proposed Action (Alternative B).

The fact that only minor changes were made over the past year is deeply concerning given that the Forest

Service is now committed to a nationwide Forest Plan amendment process (now underway) that will update agency stewardship of mature and old-growth forests. The Telephone Gap project should be put on hold until this process is completed in early 2025.