

Data Submitted (UTC 11): 1/16/2025 8:03:24 PM

First name: Stuart

Last name: Blood

Organization:

Title:

Comments: This is my objection to the Decision Notice and Finding of No Significant Impact (DN/FONSI) for the Telephone Gap Integrated Resource Project Final Environmental Assessment (Final EA). My objection qualifies for consideration pursuant to 36 CFR 218, Subparts A and B because (a) I submitted timely project-specific written comments during the comment opportunity on 13 March 2023 at 2:53:20 PM and (b) there is specific new information regarding the presence of Canada Lynx in the project area that has arisen since the designated comment opportunities ended.

I am motivated to make these objections by my love of Vermont and the Green Mountains. I have hiked in the proposed logging project area and experienced an ineffable sense of awe, peace and belonging. Places like this are so rare and should be treated as sacred.

I'm also motivated by grief and dread over the climate crisis, which is even more clearly upon us than when I wrote my comments two years ago.

Those comments included this:

"A substantial body of scientific research has shown that trees in that age range accumulate and store more than young trees, making mature forests critical systems for mitigating the effects of global climate change. The Green Mountain National Forest has greater carbon density than most forests in the Eastern US."

And this:

"The largest 1% of trees store 30% of all above ground forest carbon in the US. On average, New England's public forests store 30% more carbon than private forests"

And this:

"Research by the University of Vermont shows that New England forests could store 2 to 4 times more carbon if they are just left to grow old. Leaving mature and old trees standing is one of the most effective things that the Forest Service can do to combat climate chaos."

The final assessment does not adequately address these issues. The draft plan would allow the logging of nearly 11 thousand acres of public forest, 91% of which is classified as mature or old. It would allow the cutting of 817 stand acres of old-growth, as the term is defined by the USFS. That would be an unnecessary and extraordinary climate impact. The project would release 254,556 metric tonnes of CO<sub>2</sub>e over 15 years, almost all due to biogenic emission, according to the Final EA. In contrast, under the "no action" alternative, which was rejected by the Forest Service, only 3,350 metric tonnes of CO<sub>2</sub>e would be released over that period, due to fossil fuel combustion. See Final EA Table 3-14.

In my March 2023 comments, I wrote:

"The Northern Long-eared Bat is teetering on the brink of extinction as the U.S. Fish and Wildlife Service acknowledged last November when it listed the species as "endangered". The bat's habitat is mature and old-growth forests, which it needs for roosting and foraging. That is exactly the habitat that would be destroyed by logging in the Telephone Gap project."

The Revised Biological Assessment (Wildlife) acknowledges Northern Long-eared Bat is listed as "endangered" under the Endangered Species Act and that it is present in the project area. Oddly, the assessment concludes that the "potential effects to [Northern Long-eared bat] habitat will likely be positive by promoting forest health and diversifying stand age class." However, in the narrative that follows, only the three alternatives that include logging are compared. Alternative A, "no action" is not included among the comparisons. No explanation is given for a conclusion that logging within the bat's habitat will benefit this endangered species.

I did not comment specifically on Canada Lynx habitat in my March 2023 filing. New information is now available, which I will now comment on as part of this objection. The Final EA classifies the lynx as "extirpated" in the GMNF. The Biological Assessment (Wildlife), revised 19 November 2024, likewise classifies the lynx as extirpated and gives it a "low" probability of occurrence in the project area. However, on 3 September 2024, a bit more than two months earlier, a security camera recorded a Canada Lynx walking through the parking lot of the GMNF Supervisor's Office in Mendon, VT. (See attached image.) It's obvious that the Biological Assessment is a flawed basis on which to base a determination of "no impact" on this species.

The Forest Service estimates that there are only about 2,000 acres of old growth, which represents a mere 0.5% of the 400,000-acre Green Mountain National Forest. The Telephone Gap project would have a large and unnecessary climate impact. The proposed cut of 817 acres of that old growth represents an unacceptable threat to this extraordinarily rare and important habitat.

I ask that this project be abandoned.

Respectfully,  
Stuart Blood  
Thetford Center, VT