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Comments: Hello Chris,

Please receive my objection to the most recent proposal for the Telephone Gap SOPA. There are several reasons that the US Forest Service should have proceeded with the preferred alternative, Alternative B, rather than reducing the cutting schedule in this plan. I have attached four documents as supporting documents including three initial comments, one from myself, and two from contemporaries of mine as they elucidate the myriad reasons the Service should reassess and return to Alternative B. The three of us have discussed at length, and feel that the Service is being remiss by capitulating to reduced treatments, rather than implementing Alternative B.

Much of the Green Mountain National Forest is tragically overdue for forestry treatments, and Telephone Gap is no exception. The 2006 plan made it very clear that aggressive timber management was the expectation moving forward. Nothing has changed in terms of the need to create young forest except that the need has grown. A lack of early successional habitat is our looming habitat crisis.

There seems to be an outsized interest by some to focus entirely on creating old forests, but as we are currently replacing timber at a greater rate than we are losing it by all mechanisms combined, we can expect to meet goals for this habitat type naturally over time. This hyper focus on one habitat type above all cannot result in positive outcomes for our wildlife or the biodiversity of our landscape. Alternative B looks at the landscape holistically and accounts for this.

Vermont has recently established legislation to meet 30 by 30 and 50 by 50 goals. The guiding document for these goals is Vermont Conservation Design (hereafter referred to as VCD).
<https://vtfishandwildlife.com/conservation/vermont-conservation-design>

Rather than having an aspirational goal for early successional habitat, VCD has a goal that drafters felt might be attainable. Even with this reduced goal for early successional habitat, we are not achieving it. The US Forest Service is in a unique position to be able to be a strong partner in reaching these goals, and the preferred alternative, Alternative B, is a good step in that direction. Stepping back from that and reducing the potential treated area simply does not make sense. It's inappropriate and disappointing to say the least.

Early in 2023, yourself and your staff publicly espoused Alternative B, a plan that was well vetted through all avenues available to the Service. Years of cataloguing, scientific review, and planning directed us to Alternative B as best enhancing the character and health of our Green Mountain National Forest. If it is no longer the appropriate outcome for this decision, the public deserves an explanation of exactly what failings in the original process were brought to light, who was responsible for those oversights, and how they slipped through the cracks over several years, reviews, and processes.

It is my expectation that pressure from Washington has driven the decision to suddenly step away from a well-developed plan and reduce the proposed level of timber harvest. Neither personal agendas, congressional disapproval, nor presidential fiat are appropriate guideposts for managing public resources. I don't believe that anything meaningful has changed, I believe that the service is either capitulating to or being told to capitulate to these factors, and as stewards of our public lands, it is incredibly disappointing to see.

As noted in my original comment, I truly appreciate the effort that the Service put into developing this plan. It was not done thoughtlessly, or whimsically, but rather with an eye to what was best for the landscape writ large. The

sudden shift to a lower level of proposed operations does not appear to be guided by the same science or review that established Alternative B as the preferred alternative, therefore we urge the US Forest Service to return to the initial preferred alternative as the plan to be implemented and move forward with the corresponding schedule of operations.

I will look forward to Alternative B being restored as the final SOPA for the Telephone Gap and look forward to continuing to engage with you and your staff in the future.

My best regards,

Mike

Mike Covey
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