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First name: Jonathan

Last name: Gibson

Organization:

Title:

Comments: Telephone Gap IRP Comment

Jonathan Gibson, April 8, 2024

Before giving my comments, I want to express my appreciation to the GMNF staff for your diligent and extensive assembling and presenting of information on the proposed Telephone Gap Integrated Resource Project and the direct, indirect, & cumulative impacts of Alternatives and for your communication with the public and consideration of public comments during this NEPA process. You have a difficult task, and I hope you will continue to seek to manage these public lands to give greatest respect both to the land itself and to what people value it for.

The one month allowed for full review and thoughtful comment on such a massive amount of documentation was insufficient. These comments are all that time permitted, and I may have missed or misunderstood some information. Please accept the specific and the general comments, even if some errors, in the constructive spirit in which they are offered.

As thorough as the Preliminary Environmental Assessment and its Appendices and supporting documents are, I think the EA still falls short of the NEPA requirement for evaluation of alternatives: there is still one very obvious Alternative (perhaps with a few variants) that the EA fails to consider. This is what I will call an "Enhanced Alternative A" which I'll describe below. I also think the EA is deficient or inadequate in addressing some of the publically identified concerns with respect to the various alternatives as I also note below.

The crux of the problem (and the cause of what must admittedly be called controversy) is the result of an administrative decision to propose the Telephone Gap IRP (and other Early Successional Habitat Creation projects) before preparing and submitting to public and agency review a new or revised GMNF Long Range Management Plan. You received this criticism in the Scoping phase, and it is fundamental, overarching, and continues to apply. Staff is caught between significant advances in science and a full-fledged climate crisis in 2024 and a legal requirement to follow a Forest Plan from 2006.

The EA states this problem clearly at the outset: "The Forest Plan goals, objectives, and management direction for the desired future conditions of resources are the primary drivers defining the need for the Telephone Gap project proposed action" (pg. 3). It is replete with references to past analyses (HMU and other), the data and guidance for which were being acquired and formulated 20 or more years ago. Reliance on an outdated foundation for analysis presents an intrinsic and insurmountable obstacle to current NEPA compliance.

This is why I believe the only tenable course the USFS can take with regard to Telephone Gap is to propose and, after considering public comment, make necessary adjustments to and adopt an "Enhanced Alternative A". This would include control and appropriate treatment for invasives, aquatic resource improvements (dam removal, road realignment, culverts for aquatic organism passage), oak habitat enhancement, trail decommissioning and all or most trail expansion, some forest habitat treatments for "stand improvement" (1320 acres), and other non-controversial actions that are precluded by the current "straw man" Alternative A.

"Enhanced A" could possibly include some "late successional enhancement harvests". However, this would depend on the location and age class of the stands and go forward only if it is designed to occur in a "mature forest research reserve" in which these silvicultural enhancement techniques would be applied, monitored, and demonstrated over time (ideally with Congressional designation and funding thereof). The time frame for

implementing this Alternative would be 7 to 10 years, during which period the GMNF LRMP would be revised so thereafter longer term alternatives can be considered. I urge the District Ranger to take this path forward. A relatively short time will be required to complete the NEPA decision process (summer - early fall) and this will be much quicker and preferable to other possible outcomes.

Other comments:

In the Alternative B document (pg.7), 786 acres where white ash is found along roads and at trailheads is slated for non-commercial felling or commercial harvest as hazardous and a human risk. The EA should also describe proposed treatments of selected groups of white ash for protection from emerald ash borer (perhaps present in documents, but hard to find).

The Telephone Gap project has a total area of 72,258 acres, but impacts outside FS lands are not included in the "cumulative" impact assessment. The EA says "...there are some ongoing and planned timber sales occurring on non-NFS land" (pg. 88). To assess landscape-wide impacts, particularly with regard to forest habitat, it is essential to take cognizance of what is happening on nearby private lands. This is obviously not as easily done as with USFS owned and managed lands, but data is available for any land enrolled in Vermont's Use Value Appraisal program (and other technical tools exist) and should be presented and considered.

Throughout the discussion of animal and plant species, water and wetlands, soil, and other resources, reference is made to "mitigation measures" as the basis for concluding that impacts will be "minimal" and, while such measures are site-and-circumstance-specific, these are not described, so there is no way to assess whether or not they will be adequate.

Alternative D calls for less intense logging and is a welcome addition to the EA, reducing timber harvest acreage from Alternative B as it does by 2,816 acres (34.3%) and the volume by 18,750 CCF (32.5%) - and temporary road miles by 33.1%. But it substitutes the "modified" enhancement practices for the suite of conventional practices in B and continues to call for significant disturbance and extraction on many mature forest stands (89% of the IRP stands are over 80 years old (pg. 61). Commercial harvesting in D on the remaining 5,389 acres (66% of B) will have negative impacts due to loss of present carbon sequestration and of the natural ecological processes to which this land tends and is capable. The EA is inadequate in that no proposal is made or evaluated for possible positive or negative impacts of a "carbon reserve forest" or any "ecological reserves" within the project area.

In soils section 3.8, "removal of nutrients stored in woody materials" is cited as an indicator of concern (pg. 89), but assessment of the nutrient aspects of soil is lost in the focus on the physical issues of mineral soil exposure, topsoil displacement, erosion, rutting, compaction, mixing of layers. Pg. 91 recognizes that "Soil organic carbon is the largest terrestrial carbon sink", but there is no treatment of the biological functions of soil in terms of micro-organisms, mycorrhizae, etc. in either 3.8 or section 3.4 on carbon. This is huge deficiency in considering the project's impact on soil, which is the basis for forest productivity and ecological health.

Whole tree harvesting is mentioned several times in the EA: "whole tree harvest[hellip].can remove three times the aboveground nutrient pool than (sic) bole only harvest" (pg.92), but there is little to no information on the expected breakdown of roundwood forest products - sawtimber, pulpwood, firewood (or biomass). Though Sec 3.4 for carbon contains detailed discussion, the effort to assess the IRP's impact on carbon removed, embedded in wood products, burned in fuel wood or biomass, or left on site in wood or soil thus falls short.

The Pittenden Roadless Area is discussed in Sec. 3.12 (pg.111-114). Of the Area's 6,511 acres within the IRP, a total of 1,797 acres (27.6%) are proposed for timber harvest under Alternative B. The EA states "Management activities would not alter the roadless character of the Pittenden roadless area to a degree that would preclude it from consideration as an inventoried roadless area and evaluated for wilderness capability during the next Forest

Plan revision planning process" (pg. 114). I suggest rereading The Wilderness Act and eliminating this narrowly construed statement - and any human intrusion - until the new Plan is adopted.

The EA is likewise inadequate in that none of its alternatives consider proposing any of the project area for a wilderness study area category or for de-facto or Congressionally-mandated wilderness. Both the Cape and the Blue Ridge Fen Natural Research Candidate Areas should be expanded and officially designated as an RNA's. Timber operations in the stands north and east of the Cape RNA or that are proposed by the IRP anywhere else in Pittenden Roadless Area should be removed from any silvicultural treatments in the Alternative selected by the District Ranger to avoid impairment of wilderness characteristics.