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Title: Board Chair

Comments: Comments to the US Forest Service on the Telephone Gap Integrated Resource Project Proposed Action

I am submitting comments on behalf of the Climate Economy Action Center of Addison County (CEAC). CEAC is a 501(c)(3) not-for-profit organization with a mission to promote a healthy economy through deep reductions in greenhouse gas emissions in Addison County, VT. More information on CEAC is available at www.ceacac.org.

CEAC adopted a Climate Action Plan for our county in 2021. It includes the following two strategies that are relevant to the proposed Telephone Gap Integrated Resource Project on the Green Mountain National Forest.

Strategy AF 6:

Increase county-wide carbon sequestration on urban, forest, and agriculture lands by 10% by 2030 compared to 2017.

Strategy AF 7:

Maintain county-wide carbon stocks in natural landscapes by maintaining mature land types (i.e., keep forests as forests, wetlands as wetlands, etc.) to minimize the loss of valuable carbon stores already existing in Addison County.

While only a very small part of the Telephone Gap project is in Addison County (the piece in Goshen), major portions of the GMNF are in our county and it seems likely that some future similar projects will be in our county.

CEAC requests that the planning team for this project, and indeed those responsible for all management decisions on the GMNF, explicitly consider the likely impacts of their decisions on greenhouse gas releases and on forest storage of carbon. You already consider numerous other potential impacts - on water quality, wildlife, recreation, the local economy and so on - yet considering the impact of your decisions on risk of climate impacts is not explicitly called out in the documents we have reviewed. We believe this is a critical omission and that the management plans identified in the Integrated Resource Project should all be evaluated in relation to their greenhouse gas impacts.

The amounts of greenhouse gasses released and impacts on carbon storage and sequestration should be estimated for all proposed management activities, including but not limited to: road and trail building, vehicle operations, and tree cutting.

We advocate for as little tree cutting, and especially as few larger mature trees, as possible. But we understand the legal multi-use requirements under which the USFS operates. As such, we assume some trees will be harvested. We strongly request that you specify end uses for harvested timber that have the least GHG impact. It makes a huge difference to the climate whether the wood is used, for example, to supplant concrete in building construction, or to burn at the McNeil plant in Burlington.

Thank you for your consideration of these requests.