

Data Submitted (UTC 11): 3/10/2023 4:45:18 PM

First name: Andrew

Last name: Hudson

Organization: 198 methods

Title:

Comments: On behalf of my organization and our approximately 100,000 members nationwide, I submit the following comment on the proposed management plan for the Telephone Gap Integrated Resource Project

Our first and primary concern is that the draft management plan undervalues old growth and mature trees as a valuable climate change mitigation. Mature and old-growth forests excel at removing and storing carbon from the atmosphere. And yet, 92% of the areas proposed for logging in the Telephone Gap timber sale are classified as mature or old by the Green Mountain National Forest. This would be yet another broken promise from the Biden Administration, which promised on Earth Day 2022 to protect these forests for the benefit of the climate and biodiversity, as part of its plan for reducing global warming pollution 50% by 2030, and to net zero by 2050.

Nor is an action to delay or withdraw logging based on climate mitigation unheard of. In December, the US Forest Service withdrew a timber sale in Oregon called "Flat Country" because it targeted mature forests of up to 150 years in age. Telephone Gap proposes logging forests up to 160 years in age.

IN addition to climate concerns, the Telephone Gap IRP threatens important headwaters for Otter Creek, as well as the White River, a tributary of the Connecticut River. Logging threatens water supply areas like the Chittenden Reservoir, and risks exacerbating flooding in downstream communities. Imperiled brook trout and reintroduced populations of Atlantic salmon depend on cold, clear water flowing from these high mountain streams. Furthermore, extensive logging may disturb habitat for the endangered long eared bat, and for other threatened and endangered species of birds that migrate through the GMNF.

The Telephone Gap timber sale proposes nearly 2,600-acres of logging inside the 16,000-acre Pittenden Inventoried Roadless Area, second largest in the entire Green Mountain National Forest and one of the largest wildlands in Vermont. Straddling an undeveloped and rugged section of the Long Trail from Brandon Gap south towards Chittenden Reservoir, this area is important for wildlife habitat and connectivity as well as quiet recreation.

In conclusion, we believe that that existing management plan is over reliant on logging, especially clear cut, clear cut with reserves, shelterwood with reserves, thinning, and group selection. Individual tree selection, and targeted clearing to promote specific species such as oak, aspen and paper birch may be acceptable - but doe not compose more than a fraction of the proposed 11,000+ acres of timber sales and logging. The forest service knows full well that the value of standing, mature trees is greater - both ecologically and economically - than is represented in this plan.

With deep respect and hopes for continuing dialogue in this process on behalf of our membership,
Drew Hudson, founder, 198 methods.