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Comments:

In early 2023, approximately 1,600 commenters (a record for the Green Mountain National Forest) as well as more than 13,000 petition-signers wrote to you about the implications of the Telephone Gap Project. The vast majority of those who commented one year ago expressed the same concerns that we are raising in this letter for a second time.

Considering the level of public outcry over the proposed scale of logging in mature forests and Inventoried Roadless Areas in the Telephone Gap project, we are alarmed that the Forest Service's Proposed Action to log nearly 12,000 stand acres has changed very little from the last version available for public review.

The Telephone Gap logging project has been called one of the ten worst projects in the U.S. by Climate Forests, a national coalition of 120 environmental groups. This highly destructive proposal would devastate an area larger than the City of Burlington, Vermont. It endangers the water quality of two of Vermont's largest rivers, the White River and Otter Creek, puts downstream communities in greater danger of flooding, risks introducing invasive plants, and destroys habitat needed by threatened and endangered species like the Northern Long-eared Bat.

We are pleased to see that the Draft Environmental Assessment includes two alternatives, C and D, that would reduce the amount of logging in mature forests and the number of miles of roads and skid trails compared to the Proposed Action. However, Alternatives C and D still contain fatal flaws that jeopardize the unique qualities of the Telephone Gap landscape and contradict President Biden's Executive Order 14072 on conserving mature and old-growth forests.

The landscape targeted for logging includes portions of a vast, 16,000-acre Inventoried Roadless Area and forests with major concentrations of mature and late-successional trees between 80-160 years old. Roadless areas of this size are rare in Vermont and New England, and are especially important for biodiversity and clean water. Meanwhile, older forests excel at accumulating and storing carbon and provide the full suite of habitats, from early to late successional conditions, required by the region's native species. The Green Mountain National Forest has older, healthier forests than most in New England; we should manage this public land for the benefit of the climate, clean water, and biodiversity, not cut it down.

The US Forest Service is actively developing an EIS for a nationwide forest plan amendment that will shape future management of mature and old-growth forests on lands in the National Forest System. On December 18th, 2023, Forest Service Deputy Chief Chris French sent a letter to every Regional Forester to "reserve to the National Forest System Deputy Chief the decision-making authority over management of old growth forest conditions on National Forest System lands during the amendment process. Effective immediately, any projects proposing vegetation management activities that will occur where old growth forest conditions (based on regional old-growth definitions) exist on National Forest System lands shall be submitted to the National Forest System Deputy Chief for review and approval."

More than halfway through the ongoing comment period, the Green Mountain National Forest acknowledged that

817 acres meet the Region 9 old-growth definition within the pool of stands proposed for timber harvests. The Green Mountain National Forest plans to log within these 817 acres in all but the No Action Alternative. What's more, it is also refusing to comply with the Deputy Chief's December 18th letter by submitting the project for elevated review.

Short of selecting the No Action alternative, which would have the greatest positive impact on forest carbon, biodiversity, and clean water, we request that all mature and old-growth stands, as well as all stands within Inventoried Roadless Areas, be removed from the pool of acres available for timber harvest in a final modified alternative.

The Green Mountain National Forest is a regional and national treasure. Please do not squander the invaluable resources in the Telephone Gap project area, and the potential for old-growth recovery across this landscape, at the expense of future generations.

Thanks for your consideration of these comments.