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Comments:

1) The comment period was too short, despite numerous requests to extend it. It was hypocritical to ask us to read the documents for ourselves and not rely on others. The NEPA recommended document length is 75 pages, probably to reduce your workload, but it also applies to the public's ability to comb through it. I would like a copy of the letter allowing the project writer to exceed 75 pages excluding appendices. Also new material surfaced during the comment period concerning the existence of old growth in the area, according to the Region 9 Forest Service definition of old growth. This inclusion of old growth merits the review of the Deputy Chief of the USFS, something which you clearly want to avoid. EO-FS1215a in the new map legend without further explanation seemed to be a deliberate attempt to not fully educate the public.

2) Please wait for the Nation Wide Forest Plan Amendment! Chris Matrick's response to me that this would not apply to this project because "we have our own definition of old growth in our forest plan" is not necessarily the case. You appear to me to be racing ahead to avoid any possible influence that this amendment might have.

3) The magnitude of this project and the high level of public concern as evidenced by the number of comments after the scoping, indicate the need for an EIS. You have already done much of the work in your lengthy EA. Nevertheless all your findings of "no significant impact" are not fully researched. An EIS would be more complete and gain public trust which I think you are losing.

4) I am for Alternative A, No Action. My main reason is the current crisis of climate change. Thank you for your carbon assessment which is incomplete. For one it does not indicate the amount of carbon that would be sequestered and stored over the mid/long term by not logging. Please show me an old growth forest on the planet, and/or the research that indicates that "carbon storage has plateaued or stabilized in the mid-long term as carbon flux reaches an equilibrium of incoming and outgoing carbon", as you state would "likely" happen to old growth in the Telephone Gap/GMNF.

A stand of trees 60 -150+ years old will sequester and store more carbon over the next 20 critical years and beyond than the same acreage of clear and patch cuts which emit carbon in their making (including all the carbon emitted in the transportation and processing of the wood...) and release carbon for many years from the soil. Somehow your carbon analysis fails to find/state this.

Your outdated forest plan lacks any significant management (actually lack thereof) for old growth in any logging accessible place. Please let me know the acreage of any such unmanaged areas in logging accessible places. Clearly this would not include wilderness areas above 2000' in elevation or necessary buffers around sensitive areas which may well not be in areas suitable to long lasting stands (i.e. hydric soils).

I also object to the idea that by choosing Alt. A, your hands are tied from what should be routine trail and parking lot maintenance and road maintenance (i.e. fish passage inhibiting culvert on Forest service rd. 57). You could write a Recreation Plan for this highly used recreational area, n'est pas?

5) You have made an argument for "early successional habitat" without making a complete inventory of that habitat type in the project area. You only count areas created by your management! You acknowledge that this habitat type is produced by natural causes, and there is also a lot of private land in the project area where early successional habitat may occur.

6) Please, no road building in roadless areas! We need a balance of "wild" and "working" forest. GMNF lacks deep interior undisturbed forest which roadless areas foster. High priority species such as Bicknell's Thrush, Wood Thrush, Red-headed Woodpecker, as well as numerous resident or migrating through warblers --

Blackpoll, Canada, Blue-Winged, Black throated Green, use undisturbed forest, as well as, Pine Martens, Long-eared bats and Indiana bats. Currently classified roadless areas are ideal places to foster old growth. Roadless areas are special places and deserve to stay that way. I think that the knowlege that "wild" exists, is important for the human psyches.

7) I am concerned about possible PFAS in the herbicides you are using. Legal or not, it is known that they are bad for the environment and for human health. You need to show that you are not contributing to the spread of PFAS. We certainly don't need a source for them near Chittenden Reservoir.

8) Several thousand plus acres are already being cut in the Robinson Project within the Rochester District, and thousands more in at least three other ongoing projects. Your piecemeal approach project by project makes it seem like each project is in isolation and is somehow small.

I would like an accounting of all acreage currently under approved "treatment" management.

9) You mention the headwaters being protected by the Telephone Gap area, and that somehow removing a very large number of large trees will not have an impact. I beg to differ!

10) The primary use of the Telephone Gap area is recreation and it should be managed that way -- for boating, fishing, hiking, hunting, camping, swimming, mountain biking and snowmobiling, all of which together result in thousands of human visits over the course of a year. You have lumped recreation management into a large plan of "treatments". I have objected to this already. Nevertheless, as I am confident that Alt. A is not receiving any consideration on your part, I will include specific recreation management concerns.

a) Chittenden Reservoir and Leffert's Pond need a 1/2 mile buffer zone from logging around them on any forest service land. This is for water quality, visual, and enjoyment purposes. Specifically, stands in C145 -- 45,42,35, and in C147 -- 77 should be left alone. Some of these stands also include old growth as defined by Region 9. I like seeing and being among such trees. How about you?

b) The recreational trail system around the reservoir, up to North Pond, South Pond, and Mt. Carmel are heavily used. You could easily determine that this is so with strategically placed cameras. These trails deserve the same buffer as the Long Trail.

c) I object to a privately built and maintained hut at South Pond. Perhaps a non intrusive Adirondack style shelter, built and maintained by the forest service would be appropriate?

d) A cumulative impact of the Velomont trail needs to be developed before any new bike trail is built.

Sure I have a walking bias -- many more of us do that than snowmobile or bike.

11) I am incorporating by reference the comments of Standing trees and EarthJustice, and would like to be included in any objection responses.

Thank you for your time and consideration of these comments.

Alan Coulter