

Data Submitted (UTC 11): 4/8/2024 4:00:00 AM

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Organization:

Title:

Comments: US Forest should make the right decision supporting Alt. A

April 7, 2024

USDA - Forest Service, Rochester Ranger District c/o

Christopher Mattrick 99 Ranger Road

Rochester, VT 05767

Christopher Mattrick - District Ranger,

I am writing to express my strong opposition to the proposed Telephone Gap Integrated Resource project. It should be noted that I provided scoping comments with my initial letter dated March 13, 2023. My concern and comments continue to be focused on Timber Management and Recreation.

Timber Management: National Climate Impact

I am writing these comments while still assessing my property damage after devastating April (!) winter storm last week. Rapidly changing and increasingly unpredictable climate is demanding that we change our relationships with Vermont's forest ecosystems. We need to move from forest resource management as job one to putting forest ecosystem conservation first. We need a political process that encourages more involvement by people who love their forests, which are the foundation of our way of life.

The areas proposed for logging in the TGIRP have concentrations of mature and late-successional trees between 80-160 years old, which science shows accumulate and store the most carbon in the fight against climate change. The GMNF has greater carbon density than most forests in the Eastern US; we should manage this public land for the benefit of the climate and biodiversity, not cut it down.

The largest 1% of trees store 30% of all aboveground forest carbon in the US. We should not be spending our tax dollars to subsidize cutting mature and old trees. Our children and grandchildren alive today will bear the brunt of the climate catastrophe that is happening all around us. Research also shows that New England's forests could store two to four times more carbon if we let them grow old. Letting these old trees stand is one of the most effective things that Vermonters can do. We must put our public forests on a different path.

#### Recreation

The FS continues to use piecemeal approach to development of recreational opportunities without assessing a cumulative impact of the proposed actions on wildlife, vegetation, soil and visitors' experience. The bigger picture is that the GMNF Forest Plan does not address the build-out of huts and extensive mountain bike networks.

It appears there are no master plans for either the VHA or the Velomont Trail. In a public field trip last fall, District Ranger Chris Mattrick stated that a Master Plan is needed for all of these hut proposals and that was going to be undertaken by VHA. The fact that the South Pond hut was tossed into the NEPA analysis for Telephone Gap is solely based on the convenience of its

geographic location being within that analysis area. This stand-alone hut analysis is very disingenuous, as it clearly avoids the required cumulative effects analysis required by NEPA that would occur under a comprehensive Master Plan. Construction of a hut that is to become part of a system or network of huts throughout the forest requires analysis of that entire system.

Conducting a piece meal analysis fails to discuss and disclose the cumulative effects that such a hut system may enact. Forest recreation managers should be well aware that introduction of new facilities would have multiple effects (at a minimum) on existing wildlife, changes in visitor use patterns and seasons of use, and maintenance/enforcement requirements that will be an added burden to budgets.

None of this can be effectively analyzed without a comprehensive view of the total system or

network that is being ultimately envisioned. NEPA requires cumulative effects analysis on an entire systematic proposal just to address those concerns. Without an actual plan moving forward with the proposed activities in the TGIRP is premature.

In conclusion, none of the proposed TGIRP alternatives except for No Action Alternative A aligns with the FS's mission: "Caring for the Land and Serving People" therefore TGIRP should not be implemented. The FS should make the only right decision by accepting Alternative A- No action.

Thank you for the opportunity to comment on the proposed Telephone Gap Integrated Resource Project within the Green Mountain National Forest.

Respectfully,

Leo Zhelnin