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Organization:

Title:

Comments: To: Randy Moore, Chief FS; Angela Coleman, Associate Chief FS; US Representative Becca Balint; US Senator Bernie Sanders; US Senator Peter Welch

Copy: Christopher Mattrick, District Ranger FS; Jay Strand, NEPA Coordinator FS

I am submitting this request in solidarity with Vermont's Indigenous Communities. The Telephone Gap Integrated Resource Project (TGIRP) is a massive project in the Green Mountain National Forest (GMNF) that includes logging in areas that have been identified as "old-growth community types" for Region 9 in the "Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management" issued April 2023 by the US Department of Agriculture (USDA) in response to Executive Order 14072, Section 2(b). This Executive Order was issued with the goal of restoring and conserving the Nation's forests, including Mature and Old-Growth Forests. The TGIRP is the first major project proposed in the GMNF since the issuance of Executive Order 14072 and the USDA document issued in response to Executive Order 14072, Section 2(b).

US Forest Service (USFS) and USDA specialists have been working on this project for over two years. The Public Engagement Process started in January 2023 with the issuance of the "Telephone Gap Integrated Resource Project - Proposed Action". That Comment Period was for 45 days and included public meetings. The most recent document "Telephone Gap Integrated Resource Project Preliminary Environmental Assessment" (TGIRP Preliminary EA) was issued on March 8, 2024 with a Comment Period ending on April 8, 2024 (30 days). The document is 137 pages, addresses forest habitat, timber resources, soil, wetlands, recreation, visual quality, transportation (Roads and Infrastructure), and special uses. The many activities proposed in the document are logging, trail development and maintenance, dam removal, erosion control, and road infrastructure. There are 4 Alternative Actions identified with comparisons of Management Activities for each.

I appreciate the actions taken by the GMNF staff to engage the public in this project. However, even though a 30 Comment Period is in accordance with NEPA, a 30 day time frame does not allow the public adequate time to fully comprehend the actions and potential environmental impacts, perform adequate research, and write a thoughtful and meaningful Comment Letter for a project of this significance.

A request for an extension to the Comment Period for the TGIRP Preliminary EA was submitted to the GMNF by a Vermont citizen but subsequently denied.

By way of this letter reflecting my own concerns and including the Petition From VT Indigenous Communities and Allies to Extend Public Comment Period on Proposed Telephone Gap Forest Logging Plan (Attachment A), I am requesting your assistance and intervention with GMNF staff to extend the Comment Period for the TGIRP Preliminary EA.

Thank you for your time and consideration.

Mark Nelson

Ripton, VT

Attachment A:

Petition From VT Indigenous Communities and Allies to Extend Public Comment Period on Proposed Telephone Gap Forest Logging Plan

Whereas Vermont's Indigenous People hold unique insights and millennia old knowledge about protecting Mother Earth and our Other Than Human Kin for whom we are moral and legal guardians;

And Whereas the United States supports the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) as of December 16, 2010 with President Obama's declaration;

And Whereas UNDRIP calls for "full, informed and prior consent" from Indigenous Peoples for projects impacting their well-being and cultural integrity:

And Whereas Vermont is the home of four state recognized Abenaki bands, many unenrolled Native people, and numerous federally recognized tribal enrollees whose full, informed and prior consent has not been provided for concerning the impact of a massive 12,000 acre Telephone Gap Forest Logging Plan and how it may impact cultural sites;

And Whereas the Telephone Gap Forest Logging Plan contravenes Vermont's Community Resilience and Biodiversity Protection Act (2023) that announced intentions to increase protected landscapes and habitats thereby enhancing biodiversity:

We, on behalf of Vermont's Indigenous Communities and our Allies, request that the current review and comment process and deadline of April 8, 2024 be extended by 180 days so that the above issues can be addressed.