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Organization:

Title:

Comments: Dear Ranger Mattrick,

The following are my comments on the Telephone Gap Integrated Resource Project. Thank you for the opportunity to comment.

Summary: I support Alternative B as described in the Preliminary Environmental Assessment. I find that the Preliminary Environmental Assessment is thorough and considers all of the needed elements to be consistent with requirements of NEPA. The decision to approve Alternative B will help to implement the 2006 Green Mountain National Forest Land and Resource Plan.

Introduction: I am a Vermont resident who lives in northern Vermont. I am a frequent user of the Green Mountain National Forest (GMNF). I am a self-employed private consulting forester. I am a Licensed Forester in Vermont (#148.0121792), SAF Certified Forester (#168), and NRCS Technical Service Provider (TSP-12-8086). I have over 45 years of natural resource management experience. I have no pecuniary interest in the forest products industry.

I am personally familiar with the area of the Telephone Gap project. I have walked much of the area over many years upland bird and deer hunting. I have participated in educational and interpretive tours and walks in the area and back-country skied many of the deep forest portions of the land. I am a natural resource professional by education, training and experience as well as an active recreational user of National Forest Lands.

Background: My involvement in with the GMNF goes back many years. I have commented on previous projects back into the early 1980's and through the 1990's. I was a direct participant in the development of the 2006 Forest Plan. During the period of development of the 2006 Forest Plan, I served as the Commissioner of the Vermont Department of Forests, Parks and Recreation. I served as the Vermont Secretary of Natural Resources and was the direct liaison between the Forest Supervisor and Governor James H. Douglas. I also convened and served on the Vermont Board of National Forests. I am well acquainted with the process of development of the 2006 Forest Plan and its contents. Forest plans need to be implemented not just approved.

Findings: I have reviewed the Preliminary Environmental Assessment prepared by Green Mountain Forest staff and find it extremely well written and scientifically valid. I am very impressed with the depth of issues examined and the conclusions reached. The alternatives presented are diverse. The data collected is extensive and relevant. I find that in my educated opinion it is fully in compliance with the requirements of NEPA.

Alternative B is the only alternative that fully complies with the Forest Plan Direction. It is a proposed action that complies with the Forest Plan Management Area Standards and Guidelines. The other alternatives will not move the forest toward the desired future condition called for in the 2006 Forest Plan. Alternative B will improve wildlife habitat, benefit forest health and diversity, provide for increased recreational opportunities and contribute to the restoration of forest soils and wetlands. Alternative B is needed to help improve the condition of forest roads and trails so that they can be better suited to withstand the increasing impacts of global climate change. The vegetation management and silvicultural treatments are imperative to increasing forest diversity and improving forest climate adaptation and mitigation capacity. The alternative also helps to support Vermont's working rural landscape and rural communities through timber sales. These economically vital activities are critical in supporting the cornerstone of our state's rural heritage. Maintaining a rural working landscape is the best conservation tool we have. This is the best way to keep Vermont's forests as forests. The GMNF is a very important component of our rural life. It is very important that the GMNF play an active role in regional

conservation.

Some of the specific issues that are best addressed in Alternative B are the need to improve forest age class diversity. The need to address climate change adaptation and mitigation. The complimentary alignment with Vermont Conservation Design in many ways including increasing the lack of early successional habitat on the forest in the biophysical region.

The Preliminary Environment Assessment has some sections that are problematic, but that is because of the existing Forest Service rules and protocols for calculating the costs and benefits of timber sales. This is a long-standing issue that has not been resolved for many decades. The existing system of accounting is seriously flawed to the point of being laughable. It is not fair to go into detail here on the many flaws in the system because it is not subject to change for this process. The issue of "below cost timber sales" will continue to be a false narrative until the system is modernized to reflect the true benefits of timber harvesting to the multitude of ecosystem benefits. Ecosystem benefits can be accounted for and valued in with modern economics. The Forest Plan goals and objectives are mostly reached through the tool of timber harvesting but those tangible values are not attributed to that activity. This is unfair.

Conclusion: Alternative B is a well-documented and fully justified action. The Preliminary Environmental Assessment is thorough, scientifically sound and legally complete. This action should be approved.

All of the many ecological and social concerns have been addressed. The interdisciplinary staff who completed the assessment should be applauded for the detailed evaluations and attention to public input. This is a well-balanced proposal that takes into consideration an exhaustive list of environmental concerns. The public is well served by the comprehensive approach to resource management taken by the Forest Service.

This alternative will clearly move the Forest Plan goals and objectives forward in a positive way that is fully consistent with the Forest Plan direction. The Forest Plan Standards and Guidelines are fully complied with for the many planned activities. The environmental effects, including the cumulative effects are well documented. The result is a clearly beneficial proposal.

The alternative takes into consideration all of the components required by NEPA. It is my opinion based on my scientific knowledge and experience managing forest ecosystems in Vermont for the last 45 years that this is a sound alternative.

There should be a finding of no significant impact based on the comprehensive disclosure of all of the potential effects.

The active management of the Green Mountain National Forest through actions like this is critically important to Vermonters and all citizens of the United States of America. It will help the forest resources become more resistant to climate change. It will help to improve forest diversity, increase recreational opportunities, protect and restore old forest characteristics and help to support local rural communities.

The active management of our National Forests is a way for our country to be a global leader in forest resource management. It is a globally responsible way to produce the resources that our society demands here at home, rather than to dislocate that demand to other countries who have less resilient forests, less professional oversight and far less public involvement opportunity.

Thank you for the opportunity to provide comments and thank you for your service to our nation.