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Title:

Comments: My name is Lynne Man and I'm writing to ask the Forest Service to cancel or scale back the Telephone Gap project, a plan to log nearly 11,000 acres in an uncommonly old and wild part of our Green Mountain National Forest. At minimum, there should be no logging in the Pittenden Roadless area and in stands meeting the Forest Service's Eastern Region old growth definition.

More than 91% of all proposed logging in the Lost River IRP is within two Inventoried Roadless Areas: one on the slopes of majestic Mt Moosilauke, and one surrounding beautiful Elbow Pond. Logging in roadless areas threatens water quality and floodwater retention, as well as habitat for interior forest species. No logging should ever occur in Inventoried Roadless Areas, period. These are among the wildest few places left in New England and should be permanently protected.

The US Forest Service admits that the project is "Likely to Adversely Affect" the endangered Northern Long-eared Bat. This endangered bat can't afford to lose any more of its habitat, especially on public lands where logging is easily avoided.

The Lost River IRP fails to account for negative impacts on carbon and the climate, but claims that logging will benefit both climate mitigation and climate resilience. The Forest Service should revise its assessment to do an accurate analysis of climate and carbon impacts as required by the National Environmental Policy Act.

The draft environmental analysis is brief, unsubstantiated, and conclusory. In numerous sections, the Forest Service leans on threadbare and incomplete reasoning - often with no citations to support their claims - that Lost River logging is necessary and would not have significant environmental impacts. In the hydrology section (p. 23), for example, the Forest Service concludes that the project would have no impacts on water "quality or quantity" because it does not exceed blanket thresholds for the proportion of an entire watershed that is logged - while including no discussion of the slope of the logged lands or the increase in extreme precipitation due to climate change, both of which certainly impact the chance of negative effects to streams. The Forest Service considers no alternatives to their proposal beside a "no-action" alternative, which they cursorily discuss in half a page (p. 16). This discussion mostly amounts to an ominous claim that, without the proposed logging, "the landscape would trend toward a homogeneous even-aged structure and species mix," while providing no evidence to support this claim.

Please consider withdrawing this project which harms the forests, the climate and our enjoyment of this beautiful area.

Thank you for your consideration.

Lynne Man