

## Comment on USFS Telephone Gap Integrated Resource Project #60192

10 March 2023

Hello, good comment reviewers for the Forest Service.

As a Vermonter, a U.S. citizen, and an Earthling, I am concerned that the Telephone Gap Project is based on dangerously outdated forest ecology. Since the codification of the 2006 USFS GMNF Forest Plan, forest science has been filling in a lot of gaps in our knowledge about the more-than-human world -- and how we might partner with it. From the perspective of emerging findings, this Project proposes to cut old growth forest that's *essential to our collective response to climate change*. It undermines carbon sequestration of both trees and mycelial networks for at least the next couple decades -- which is time we don't have. This is just one reason expert after expert says, *Don't cut the old growth; we need especially to save the elder hub trees!*

In positive terms, GMNF has a chance to lead, to implement policies that reflect the newly emerging ecological paradigm (see [Simard on clear cutting](#) and [Law on when forests are carbon sinks vs. sources](#)). In starker terms, as the deciders here, *you* have a **responsibility** to exercise precaution on behalf of us all, to break the human pattern of taking irreversible action in ignorance. *You* also have a **responsibility** not to trade the "lung tissue of the planet" by means of half-measures that limit adequate environmental protections to satisfy short-term economic interests in "forest products," like wood and maple taps. (From what I understand, in Vermont, private forests more than adequately supply timber.)

Beyond the many watching and pleading in the present, imagine the eyes of future people looking back on *you* here and now, taking stock of whether you betrayed or acted in light of science and in the larger interests of future life on the planet. The [Forest Service made the right choice in the case of Willamette National Forest](#), and should make it here, for the same reasons. (The parallel extends to the threat both logging proposals posed to endangered species -- WNF's northern spotted owl and GMNF's [northern long-eared bat](#).)

The current version of the Telephone Gap Project doesn't pass muster as sustainable by the standards of today's knowledge. Let's do a proper Environmental Assessment of the consequences of this Project in light of the latest forest science, not give a perfunctory green-light to sawing off the limb that's supporting us all.

Please,



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