

My Dad's folks were attracted to the Adirondacks at the time of its logging boom. They came as tannery workers, loggers, and liverymen. They cut and stripped hemlock of its bark to feed the tanneries, they cut and fed logs for pulp into the Sacandaga River for log drives to the Hudson, and cut and supplied logs for still-existing mills making baseball bats, axe handles, bowling balls and pins, and all manner of wood products. They often died young (my grandfather's parents both died of consumption in their twenties in the logging camps), got hooked on opium and alcohol, and devastated the forests so dramatically that New York state adopted a forever wild clause in its state constitution. My folks became Adirondack guides, stagecoach and bus drivers, hotel managers, livery stable owners, and ice cream entrepreneurs. The woods have slowly recovered and are now amazing carbon sequesters. I now have only one nephew who makes his living from the woods with a portable sawmill and a skidder (which he is considering selling.)

I went off to college and eventually became a water resource engineer. In the process I was a teaching fellow in a course taught by a famous oceanographer to undergraduates at an Ivy League College. It was 1968. The course was "Human Populations and Natural Resources" and obviously covered a lot of ground. One issue emphasized as highly important but needing further scientific study was greenhouse gas buildup in the atmosphere and the greenhouse gas effect on climate. There was no doubt but that this was a critical area for scientific research and policy response. Oceanographers and atmospheric scientists responded and we as a society realized the GHG-driven climate change was a serious issue indeed. Engineers got to work with engineering responses. Unfortunately, agricultural and forestry research efforts and policy responses lagged far behind. Finally, however, the critical role of forests, agricultural techniques, soils, and biodiversity became scientifically clear. Yet after half a century little has changed in agriculture and forestry practices on the ground.

Even more startling and discouraging in places like the GMNF is that the logging of trees over eighty years — the best carbon sequestering agents — has accelerated dramatically! How can this be?

Let me pause to thank the GMNF for receiving and listening to the many, many comments delivered in the last comment period. The message that carbon sequestration, biodiversity, White River watershed impacts, and the connection between roads and clearcutting (even small patches) and invasives was heard. The response is appreciated.

I have spent some time studying the suggested plan and alternatives. I have pored over tables, unfamiliar jargon, appendices, and maps. I have tried not to shake my head in disbelief at the recognition that the urgency of recognizing climate change as a reality and a planning imperative has hardly been digested. It would appear that with the current plan over 50,000 acres of the GMNF has been or is proposed to be logged AND that this is a dramatic increase over previous logging averages. Something is wrong.

Forestry science is finally catching up with climate realities. Yet the GMNF relies on a Forest Management Plan written over fifteen years ago when such science was in its infancy. That science says unequivocally that trees 80-160 years old are the best indicators of carbon sequestration in action. Yet the plan and its alternatives talk of cutting trees under 140 or even 150 years old. The plan and all its alternatives also are very confusing or confused about invasives; sometimes saying don't worry we can control invasives and sometimes implying invasives are a major impact of alternatives presented.

In view of the expected major environmental impact of any of the alternatives B, C, or D, with B envisioning only slightly less logging than the original proposal, with C talking about around 660 acres less logging but still with many old trees coming down, and with D being very similar to C and with difficult to fathom consequences that might be positive or negative, one is left with the impression that the Forest Service has failed to seriously consider the plethora of environmental impacts associated with any proposed plan.

Therefore it is essential that the GMNF:

- 1) do nothing at present, alternative A,
- 2) perform an Environmental Impact Statement as required by NEPA.,
- 3) wait for completion of the National Forest Plan Amendment process. and
- 4) commit to no new road building in currently roadless areas.

The environmental assessment of the Telephone Gap Integrated Resource Project is perhaps a small step in the right direction as far as climate changes and biodiversity are concerned, but it falls far behind the

science and the looming climate disaster in its response. The GMNF has some additional catching up to do and I am confident they will see the urgency of delaying while more detailed and clear analysis is performed on the impacts of their proposed actions.