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Comments: Please reconsider. See attachment below.

OUR FOREST SERVICE IS ABOUT TO DETONATE A CARBON BOMB, BUT IT CAN LEAD THE US TO A NEW PARADIGM INSTEAD

I believe the staff at the Green Mountain National Forest (GMNF) are good, well-meaning professionals who care deeply about our Forest; but they are locked into outdated science and policies in a 2006 Forest Plan that work directly against efforts to mitigate climate change. I am part of Save Public Forests (savepublicforests.org). a Vermont and Massachusetts coalition of scientists, ecologists, foresters, and other citizens dedicated to contemporary, science-based solutions to the climate and biodiversity crises worsened by forest degradation. We want you to know what's at stake and to offer our GMNF staff a tremendous opportunity to lead the US to a new forestry paradigm.

A proposal has been recently released by our GMNF called the Telephone Gap Integrated Resource Project roughly east of Brandon, which includes logging 11,800 acres of mostly old and mature forest, an area larger than the City of Burlington. Most of the stands are 80-160 years old, and they continuously take up and store huge amounts of climate-changing carbon from the atmosphere.

Here's the Bomb. We conservatively calculate that the Telephone Gap logging will remove at least 543,000 Mt (metric tons) of carbon from the GMNF. For comparison: 543,000Mt of carbon is equal to the annual emissions of 419,539 cars, nearly double the total number of registered passenger vehicles in Vermont (221,936 as of 2021). Or 1.6 times the emissions from the McNeil Biomass Power Plant, VT's largest point-source of carbon emissions (about 340,684 Mt in 2022). When the trees are cut, we lose a large amount of their stored carbon, and they aren't there to store more carbon in the future. Some of the wood will make it into durable wood products; but, based on recent sales, much will go for pulp and biomass burning that provides instant release of CO₂. Considering that and the additional emissions from logging activity and processing, this will be a significant loss of stored carbon and future storage capacity.

TIME FOR A NEW FOREST SERVICE PARADIGM

IN OUR CLIMATE EMERGENCY

The urgency, and it is personal to us all. The International Panel on Climate Change (IPCC) tells us that we may reach the tipping point of 2.7 degrees F above the pre-industrial baseline as early as 2030 to 2040. The Global Carbon Budget Tracker report of 2022 reinforces that, saying we only have 9 years left before we reach the tipping point. The IPCC says mass starvation, forced immigration of a hundred million people, and global economic instability are virtually inevitable beyond 2.7. Today we are at 2 degrees, and we are seeing almost daily accounts of climate disasters here and abroad causing billions of dollars of damage and untold misery. It is easy to see how serious these predictions are. This is finally a here and now thing. My grandson Arlo is two, and we may be beyond the tipping point before he is a teenager. How old will your loved ones be in 10-20 years? Business as usual, including in forestry, must end now if we are to save them from a very chaotic future. Ominously, New England is warming about 50% faster than the global average, according to EPA data.

Appreciating the role of forests. Forests, especially old forests, absorb and store a huge 50% of the above ground carbon worldwide. New England's forests are one of the largest, most important concentrations of carbon-dense older forests in the US; and they could store two to four times more carbon if we just let them grow

(UVM study). Keeping our old trees standing in our National Forests is immediate, takes virtually no effort, and saves taxpayers money.

A national movement. Save Public Forests is part of a nationwide groundswell led by Climate-Forests, a group of over 120 groups pushing for a change in many of the Forest Service's core policies and practices. A large timber sale in Oregon was stopped this year in response to public opposition and President Biden's Executive order to protect mature and old growth forests to mitigate climate change. Telephone Gap is targeted as one of the ten worst projects in the US, and it should be next. My hope is the good people of the GMNF will creatively lead from within on Telephone Gap and show the nation a new way forward.

RECOMMENDATIONS

1. The Telephone Gap proposal and the 2006 Forest Plan on which it is based are critically out of date, because they do not significantly consider the project's impact on climate change. The Telephone Gap project should be stopped until it and the 2006 Forest Plan are amended to quantify and mitigate the effect on climate change.
2. Cutting such old stands violates the spirit of President Biden's 2022 Executive Order (EO) to protect mature and old growth forests. This project should be put on hold until its compliance with the EO can be determined.
3. Biodiversity [ndash] There is widespread scientific agreement we are now in the sixth global mass extinction, much due to habitat loss. The project area harbors thousands of species, many of which depend on interior mature and old forests for survival. We should protect not cut them.
4. The policy of cutting old trees and planting seedlings is climate flawed. State of the art research (Law et al) shows that when large old trees are cut their huge ability to take in and store carbon is lost, and the cut area becomes a net source of CO2 out of the soil into the atmosphere for 10-20 years even if replanted. Watch a fascinating 10-minute PBS video on this research [tinyurl.com/Forest-Carbon](https://www.tinyurl.com/Forest-Carbon). The next 10-20 years are crucial to stop climate change. Cutting old trees and replanting will hurt not help.

1. Cutting old forests to create young forests accelerates climate change. At the core of the 2006 Forest Plan and this Project is an outdated policy of manipulating the forest by targeted cutting to bend it into conformity with Forest Service goals. The Project proposes reducing mature and old forest from 12,000 acres to as few as 5,400 while increasing younger forest categories from 1,700 acres to as many as 10,500. GMNF is already cutting over 40,000 acres in other places, and we should not add to that at Telephone Gap. We should not be using our tax dollars to accelerate climate change. This core feature of the Plan and Project needs to be removed or greatly modified.

1. Here is the national opportunity for GMNF. The National Environmental Policy Act (NEPA) requires alternatives to a proposed project such as Telephone Gap to be analyzed as part of an Environmental Assessment (EA). This can either be a meaningless perfunctory exercise, or it can provide a serious new [ldquo]climate-smart forestry[rdquo] alternative. I and others propose that the GMNF consider working with community groups and proactively take the lead in developing a new proposal that takes seriously the spirit of President Biden's Executive order and charts a new paradigm for the US Forest Service. We suggest the essence of this would include designating a major amount of the project area as [ldquo]carbon reserves,[rdquo] in which there is very little tree cutting or site disturbance, and the old stands are allowed to grow older and bigger. Managing younger forest stands could be done in a way to produce lumber or other forest products but that also increases the average volume of stored carbon per acre over time.

Creating climate-smart forestry that sequesters carbon and increases resilience to climate change while producing forest products is a need that extends far beyond this project to the nation and the world. With Congressional support, community collaboration, and GMNF creativity, this could become a research laboratory and model for climate-smart forestry.

To date the GMNF has received about 600 comments on the project, only 35 of them fully in favor. It would seem wise for the GMNF to work in collaboration with the larger community to develop an innovative project that enjoys widespread support rather than opposition that will certainly result in appeals and stronger actions.