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Comments: Please consider my comments on the Telephone Gap project. The project is located south and east of Brandon and will include 11,800 acres of mostly old and mature forest. Most of the stands slated for destruction are 80-160 years old, already sequestering vast amounts of carbon and continuously taking up and storing tens of thousands more tons each year.

Cutting them is a huge problem. The Telephone Gap logging will remove at least 446,000 Mt (metric tons) of carbon from the GMNF. This amount of carbon is equal to the annual emissions of 354,300 cars or 1.6 times the emissions from the McNeil Biomass Power Plant, Vermont's largest point source of carbon emissions (about 340,684 Mt in 2022).

When the trees are cut, some of the wood will make it into durable wood products, but much will go for pulp and biomass burning that result in release of CO₂. And studies show that only 16% of biomass removed from the forest ends up as durable wood products. Most homes are remodelled or torn down after 10-30 years, so even this paltry contribution to carbon stores is much less durable than a mature tree growing in the forest.

Considering that and the additional emissions from logging activity and processing, the Telephone Gap project will release an enormous amount of stored carbon that will take decades to recapture. A global climate solution cannot wait that long.

The CEQ has made recommendations and provided new guidance for calculating carbon loss from a project. This information has not been followed. Attached please find the EPA comments on the South Plateau Project in Montana. It includes recent science to consider and ways to calculate carbon loss. Regardless of your forest plan, this new guidance must be followed and the analysis fully disclosed.

Please withdraw this project and fully analyze its effects on global warming. Please leave all mature and old growth forests alone and let them do their good work to mitigate a warming climate.