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Comments: Vermont's U.S. Forest Service staff are on the verge of missing an extraordinary opportunity to set a new path in public land management and to lead the way in addressing our nation's, indeed the world's, greatest challenge - the climate crisis.

After decades of managing the Green Mountain National Forest for multiple use objectives - wildlife, recreation, timber among them - there is now an urgent necessity to focus on managing our forests for their tremendous and essential capacity to help reduce carbon emissions and halt climate change with its vast impact on nature and humanity. GMNF has recently undertaken projects on thousands of acres in the southern Greens that have involved cutting trees in smaller patches, larger clearcuts, and linear shelterwood strips. These projects were based on a 2006 Plan that pursued goals and followed then-recognized practices for increasing habitat for certain species of wildlife, regenerating new vegetation, and supporting the state's forest industry. Those goals and practices do not meet today's circumstances or demands.

A shift in silvicultural objectives and a transformation of priorities is now required. Our forests are reservoirs of huge amounts of carbon, with trees taking up from the atmosphere (sequestering) and storing carbon in the photosynthetic process. The mature forests must be preserved to continue this function, not cut down for lesser purposes. The climate emergency requires an all-hands-on-deck response, especially from our government agencies that control public resources like our National Forests and that have been directed by the Biden Administration to focus on climate concerns. We cannot continue business as usual, using now backward-looking and inadequate responses.

The USFS must re-examine its Telephone Gap proposal and provide the public with an analysis and evaluation that examines how the 37,000+ acres of Federal land can be managed for maximum carbon reduction impact. This will include a thorough assessment of alternatives such as designating all or a large portion of the Telephone Gap area as an "ecological forest reserve" or a "climate forest reserve" where essentially no timber operations will take place. These would be places where the forest is allowed to evolve and develop naturally, where ecological processes take place without human intervention or interference. This alternative would basically pause timber operations for a period of at least several decades while Vermont, the United States, and nations of the world try to avert a tipping point of irreversible climate catastrophe that we are rapidly approaching.

A complementary option with the foregoing would be also to create a "climate research forest" of significant acreage and comparable conditions where limited silviculture treatments like those proposed by Bill Kenton and Anthony D'Amato of the University of Vermont to promote and accelerate a transition to "old growth" conditions would be demonstrated and monitored over time. This combination of a control and an experimental forestry area would allow researchers to perfect methods for calculating carbon flows in the forest. It would also be a model for how to do climate-conscious forestry on private lands, where shorter-horizon market considerations are a factor and long-term preservation is less likely.

Either - or both - of the above approaches can be combined with a major expansion of the existing Cape Natural Research Area and/or formal designation, though GMNF-supported Congressional action, of a new Wilderness Area (the "Bloodroot Mountain Wilderness Area" perhaps) under the 1964 Wilderness Act.

The alternatives proposed here would bring nation-wide recognition and gratitude to the GMNF and its professional staff for being in the forefront of forest carbon conservation. Imagine a headline that reads "Vermont Establishes First-in-U.S. National Carbon Forest Reserve." Such action would undoubtedly

bring significant flows of funding into Vermont to support this precedent-setting effort.

The above alternatives, individually or in combination, must receive a serious, science-based examination and analysis in the Environmental Assessment. We citizens and taxpayers deserve no less from the people who manage our forests as our employees and as the stewards of our forests[rsquo] and our planet[rsquo]s future. Can we envision a future time, 100 years from now, when our successors and our children can view a forest which looks, sounds, smells, feels, and functions like the forest that the indigenous people and early Europeans on this continent experienced?

I can, and it is a sustaining vision. You can make it a reality. I ask you to do so.