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Comments: Please cancel the Telephone Gap Integrated Resource Project. The Telephone Gap landscape is extremely important to me and countless other Vermonters, who value the extended sweeps of unbroken, mature forest for both their physical and mental well-being. I am a Vermonter in my mid-twenties who can say without any exaggeration that it is wild landscapes like Telephone Gap that keep me sane and mentally well enough to keep caring for my community and functioning in everyday life. In a time when my generation faces a world characterized by environmental degradation, immense political threats to all manner of basic rights, and everyday challenges like stagnant wages and lack of housing, wild, unmanaged places are some of the only sources of inspiration and solace that I can turn to. I feel taken aback that the Forest Service is pushing for a plan that would log nearly 11,000 acres in the Telephone Gap area, including a staggering 1,800 acres in the Pittenden roadless area, one of the largest unprotected wild places left in Vermont. Rather than another heavy-handed logging project in our Green Mountains, I urge you to protect the forests of Telephone Gap for the long-term benefits they will provide if only they are left to grow old - benefits not only to our collective mental and physical wellbeing, but also to climate, water quality, rare species, and ecological resilience.

Since I submitted my last comment on the Telephone Gap Integrated Resource Project (TGIRP), new information has come up that makes my concerns around climate and ecological resilience even more relevant, and makes it even clearer that the Forest Service, which is tasked with managing our public forests for the greatest public good, should not log in the Telephone Gap area.

In the first place, the national and local situations with respect to climate change have worsened. The Republican leaders elected at the national level plan (in their own words) to roll back what modest climate policy the United States has in place, and encourage greater production and consumption of fossil fuels. These policy changes will likely have knock-on effects around the world, as other major polluters like China, India and Vietnam take cues from the U.S.'s position on climate and roll back or disinvest in climate mitigation as well. This is relevant to Telephone Gap because it means, without a doubt, that global heating will accelerate and the project will be taking place in a hotter and more extreme climate than could be anticipated before.

This makes the climate mitigation and resilience benefits of not logging at Telephone Gap all the more important. In terms of climate mitigation, the Forest Service estimates that the Telephone Gap logging project would release over 254,000 tons of CO₂ (a new piece of information since the last comment period). That is an immense amount of carbon pollution that can be avoided at an exceedingly low cost simply by forgoing cutting (see Moomaw et al, attached, for more information on how effective and inexpensive proforestation can be as a climate solution). Mature and old forests are particularly important for keeping carbon out of the atmosphere - as Kellett et al. (attached) summarize, "the power of forests in this process [of carbon accumulation] is unparalleled and far greater in old forests than in young forests, both above and below ground; carbon continues to accumulate for centuries." Telephone Gap is so notable because 91% of the logging would be in mature or old forest, as classified by the Forest Service. This includes 817 stand acres of Region 9 old growth, out of a mere 2,000 acres inventoried in the entire Green Mountain National Forest (as we learned in the Forest Service's draft EIA for the old-growth forests amendment, only finalized in June 2024). Only a mere 0.3% of New England forests are over 150 years of age, again according to Forest Service data, and the TGIRP foolishly threatens thousands of acres that are older than this or soon to reach this threshold.

In terms of climate resilience and adaptation, numerous studies in the Northeast have shown that unmanaged forests continue to provide the most ecosystem services and are the most resilient in the face of climate extremes. Old and unmanaged forests buffer our waterways best against droughts and floods, a particularly important attribute for the forests of Telephone Gap, which sit at the headwaters of Otter Creek and the White

River, two major Vermont watersheds that have destructively flooded multiple times since 2011. Logging and the associated roads contribute to phosphorus loading and resultant cyanobacteria blooms in Lake Champlain, another economically-important problem expected to worsen with climate change. The Forest Service has couched much of the Telephone Gap logging in a discourse of climate adaptation and resilience, but there is no credible evidence that logging, especially more impactful forms of logging like group selections, intermediate thinning, shelterwoods, and clearcuts, actually improves ecological resilience compared to a no-harvest scenario (see Faison et al. and Kellett et al. for a discussion of this). I would urge the Forest Service, and anyone else considering this project, to simply visit the logging in the Forest Service's Robinson project just north of Telephone Gap. Non-native and/or "invasive" plants like curly dock and chervil line the newly sunlit roads, and patches of bare soil are common among the cuts, the soil's precious organic matter noticeably lacking after being oxidized in the sun, and its precious nutrients doubtless washed into the nearest stream. The remaining trees stand naked, more vulnerable to drought, extreme heat, and sun-loving pests like tent caterpillars. This is not climate adaptation, it is just industrial logging, with a proportionally large-scale negative impact on the function and integrity of the forest ecosystem.

Please cancel the Telephone Gap logging project and let these rare mature and old forests continue to thrive.

With compassion and respect,
Chris Gish