

Data Submitted (UTC 11): 3/9/2023 1:43:30 PM

First name: Sarah

Last name: Stott

Organization:

Title:

Comments: Thank you for the opportunity to comment. I am writing to oppose the Telephone Gap Integrated Resource Project for the following reasons:

*It is based on an outdated GMNF Forest Plan (the Plan) that does not take into consideration the climate crisis we are in. The Plan refers to the impact of climate change on trees. It says nothing about the role that trees play in sequestering carbon / pulling carbon out of the atmosphere. According to the UN's 2022 Intergovernmental Panel on Climate Change unless drastic measures are taken, the goal of limiting global warming to 2.7 degrees will be out of reach by the end of this decade. Jay Strand told us at the Feb 21st virtual presentation that the Telephone Gap proposal had to follow the Plan's objectives unless the Forest Plan was "way off, and if they could no longer rely on it for guidance for some reason, they could go beyond the plan's guidance." The fact that the Plan does not take into consideration the impact of cutting trees on climate, means that the Plan should not be used as guidance for the Telephone Gap project until it is revised.

*Logging almost 12,000 acres and releasing hundreds of thousands tons of carbon would have a significant impact on the environment. This magnitude of activity should trigger NEPA's requirement to prepare an Environmental Impact Statement.

*The Telephone Gap project and the Plan do not recognize the role that old trees play in sequestering carbon. Forest carbon cycle and climate change scientists Beverly Law and William Moomaw state that " Forests pull about one-third of all human-caused carbon dioxide emissions from the atmosphere each year. Researchers have calculated that ending deforestation and allowing mature forests to keep growing could enable forests to take up twice as much carbon." For the sake of the planet we must keep the large trees in the ground. Table 2.2-2 age Class objectives in the Plan should not be used as guidance for the Telephone Gap project, because it does not value the role of old trees in slowing down climate change.

*The Telephone Gap Project fails to meet the letter or the intent of Executive Order 14072 signed by President Biden on April 22, 2022. The order says: "It is the policy of my Administration to... conserve America's mature and old-growth forests on Federal lands." Because this project does not follow the Executive Order it should be withdrawn.

*We need to let mature trees grow, so that they will become old trees. We need to keep old trees standing until they die on their own, and their biomass stays on the ground supporting the animals, insects, fungi and mycorrhizal network in the area.

*The Northern Long-eared Bat is soon to be placed on the endangered species list. The Forest Service should stop the Telephone Gap approval process now, so that the public and potential businesses involved are not negatively impacted later on when the listing takes place and work on this project would have to stop.

*Yes, there are less of those species that need open habitats in the Telephone Gap area than in earlier days, but those are not the species that were naturally there before the European settlers denuded the area for agriculture. The forest service is using the wrong benchmark for what is natural. This area was naturally an old forest and should be allowed to be one again.

*Much of the area designated as Inventoried roadless areas 2006 was proposed as Wilderness areas in 2006. These areas should not be logged in keeping with the intention of the 2001 roadless rule and the earlier plan for wilderness here.

*Vermont needs wilderness areas for the mental health of its residents and those that come here for relaxation and peace of mind. As is widely known, spending time in nature does wonders for boosting morale and energy levels for people struggling with depression, and almost 25% of Vermont adults suffer from depression.

*Section 3.7 of the Telephone Gap proposal recommends allowing the Vermont Hut Association to construct and maintain a hut. I object to this relationship with the Vermont Hut Association. Although they are a 501c3 non-profit, they run their huts as a business, and give privileges to their members (as in early registrations) over the general public. This arrangement with VHA may be legally questionable.