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Title:

Comments: I am a young Vermonter writing to urge you to eliminate or dramatically scale back timber harvesting in the proposed Telephone Gap Integrated Resource Project. I grew up in Central Vermont and know the area between Route 4 and Brandon Gap fairly well-I hiked the Long Trail twice, including through that area, and also did a meandering, off-trail winter trip in that part of the national forest. It is an area of immense and relatively undisturbed beauty, with hardwood canopies sweeping down from the rounded crest of the Green Mountains, clear streams, and inspiring, mature trees.

The Telephone Gap area should be left free of large-scale disturbance so that the forests can continue to progress toward their natural, old growth conditions that provide the maximum benefits for local ecosystems and the planet. I respect the process the Forest Service goes through for a project like this, and recognize the competing interests you have to balance, but I worry that the Forest Service is not giving enough value to highly productive, old growth conditions. Robust science shows that mature and old growth forests foster high rates (and the highest total levels) of carbon sequestration, provide invaluable habitat for native species, and are the most resilient to climate change. If the Forest Service needs help sorting through this science, please reach out and I will happily send specific studies and reviews.

Studies have shown that New England could increase the levels of carbon sequestered in its forests by 2-4 times just by letting forests naturally grow old. Put another way, the largest 1% of trees in our forests hold about 30% of aboveground carbon. We need to let more trees get old, and Telephone Gap, where 92% of the proposed harvest areas are classified as "mature or old growth," is one of the best places in Vermont to do that. National Forests are public lands meant to be managed in the public interest, and especially during our intensifying climate crisis, it is vital to let more of these lands develop the natural old growth conditions that provide the best buffer against climate change. Cutting 11,800 acres of some of the most mature, intact hardwood forest in the state would be a disastrous step in the wrong direction.

I also question some of the rationale around the desired conditions for the Telephone Gap area. Vermont's natural land cover is nearly all mature and old growth forest-punctuated by modest disturbance from blowdown, beavers, ice, etc.-and a similar ecotype should be the goal for responsible land management today. Many threatened or endangered native species like the American Marten and Northern Long-Eared Bat depend on old growth and mature forests. It is backwards to advocate for more early successional habitat, since there is already an unnaturally high amount of early successional, open and edge habitat in Vermont. I don't dispute that, as suggested in the Notice of Proposed Action, some species that use early successional habitat are in decline-other than to add that some of the species commonly cited as dependent on early successional habitat are not native to begin with. It is much more sensible, however, to address the disturbances like pesticide use, fragmentation, and management of open land that are actually causing these declines, rather than cause more disturbance that will pass on the harm to other ecosystems.

Please eliminate large-scale logging in the Telephone Gap project and protect some of the most intact, mature forests in the state.