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Comments: Forest Service people:

The Telephone Gap project is being called the worst project of the forest service across the region. It is removing mature and old growth forests, disrupting and destroying diverse ecosystems and contributing to the climate crisis by releasing tons of carbon into the atmosphere. All the talk of "this is good for the health and resiliency of the forest" and "good for endangered species" and "good for climate" is unfounded. There is ample evidence that the best thing for healthy forests, functioning ecosystems and carbon sequestration and storage is proforestation - LEAVE THE FORESTS ALONE. Please stop this insanity immediately.

Here are some references

Kellett, Michael J., Joan E. Maloof, Susan A. Masino, Lee E. Frelich, Edward K. Faison, Sunshine L. Brosi, and David R. Foster. "Forest-Clearing to Create Early-Successional Habitats: Questionable Benefits, Significant Costs." *Frontiers in Forests and Global Change* 5 (2023). <https://doi.org/10.3389/ffgc.2022.1073677>.

Hudiburg, Tara W, Beverly E Law, William R Moomaw, Mark E Harmon, and Jeffrey E Stenzel. "Meeting GHG Reduction Targets Requires Accounting for All Forest Sector Emissions." *Environmental Research Letters* 14, no. 9 (August 23, 2019): 095005. <https://doi.org/10.1088/1748-9326/ab28bb>.

DellaSala, Dominick A., Brendan Mackey, Patrick Norman, Carly Campbell, Patrick J. Comer, Cyril F. Kormos, Heather Keith, and Brendan Rogers. "Mature and Old-Growth Forests Contribute to Large-Scale Conservation Targets in the Conterminous United States." *Frontiers in Forests and Global Change* 5 (2022). <https://www.frontiersin.org/articles/10.3389/ffgc.2022.979528>.

Leverett, Robert T., Susan A. Masino, and William R. Moomaw. "Older Eastern White Pine Trees and Stands Accumulate Carbon for Many Decades and Maximize Cumulative Carbon." *Frontiers in Forests and Global Change* 4 (May 13, 2021): 620450. <https://doi.org/10.3389/ffgc.2021.620450>.

Additionally, I agree completely with the text below:

Mature and old-growth forests excel at removing and storing carbon from the atmosphere. And yet, 92% of the areas proposed for logging in the Telephone Gap timber sale are classified as mature or old by the Green Mountain National Forest, violating President Biden's historic Executive Order from Earth Day 2022, which directed the US Forest Service to protect these forests for the benefit of the climate and biodiversity. In December, the US Forest Service withdrew a timber sale in Oregon called "Flat Country" because it targeted mature forests of up to 150 years in age. Telephone Gap proposes logging forests up to 160 years in age. If Flat Country was important to withdraw, why is the Telephone Gap timber sale moving forward?

#### SPECIES ON THE BRINK

The Northern Long-eared Bat is a species that is teetering on the edge of extinction. The US Fish and Wildlife Service listed the bat as "endangered" in November 2022. The Northern Long-eared Bat prefers mature and old-growth forests for roosting and foraging - exactly the sorts of areas that are proposed for logging. Much of the Telephone Gap project area is suitable habitat for this endangered bat.

## HEADWATERS AT RISK

The Telephone Gap timber sale threatens important headwaters for Otter Creek, which flows into Lake Champlain, as well as the White River, a tributary of the Connecticut River. Logging threatens water supply areas like the Chittenden Reservoir, and risks exacerbating flooding in downstream communities. Imperiled brook trout and reintroduced populations of Atlantic salmon depend on cold, clear water flowing from these high mountain streams.

## WILDLANDS ON THE CHOPPING BLOCK

Of the 11,800 acres proposed for logging, the Telephone Gap timber sale proposes nearly 2,600 acres of logging inside the 16,000-acre Pittenden Inventoried Roadless Area, second largest in the entire Green Mountain National Forest and one of the largest wildlands in Vermont. Straddling an undeveloped and rugged section of the Long Trail from Brandon Gap south towards Chittenden Reservoir, this area is important for wildlife habitat and connectivity as well as quiet recreation.