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Comments: The U.S. Forest Service (USFS) proposal to log 11,800 acres of mostly mature and old trees in Vermont's Green Mountain National Forest (GMNF) east of Brandon is unacceptable in this time of climate chaos and an administration executive order to protect mature forests. This massive "timber sale," part of a management plan called the Telephone Gap Integrated Resource Project (TGIRP), has been called one of the ten worst projects in the U.S. by Climate Forests, a national coalition of 120 environmental groups. This massive and highly destructive logging job would devastate an area larger than the entire City of Burlington. It would endanger the water quality of Chittenden Reservoir, introduce invasive species, and destroy habitat needed by threatened and endangered species, including the Northern Long-eared Bat, a species teetering on the edge of extinction. The US Fish and Wildlife Service listed the bat as "endangered" in November 2022. The Northern Longeared 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.

A recent paper documents the fallacies and dangers of promoting young forests at the expense of old forests, a common justification for logging old forests that has allowed decimation of our nation's oldest and most mature federal forests. (M. Kellett et al, 2023, Forest-clearing to create early-successional habitats: Questionable benefits, significant costs. Front. For. Glob. Change.) The areas proposed for logging have major concentrations of trees between 80-160 years old, which science shows accumulate and store the most carbon in the fight against climate change compared to young trees. (N.L Stephenson, et al. Rate of tree carbon accumulation increases continuously with tree size. Nature, 2014) The GMNF has greater carbon density than most forests in the Eastern US; we should manage this public land for the benefit of the climate and biodiversity, not cut it down. The largest 1% of trees store 30% of all aboveground forest carbon in the US (Stephenson et al.). We should not be spending our federal tax dollars to subsidize cutting old trees. Our children and grandchildren alive today will bear the brunt of the climate catastrophe that is happening all around us.

The International Panel on Climate Change states that time is running out for action. On the global scale, forest protection represents approximately half or more of the climate change mitigation needed to hold temperature rise to 1.5 degrees Celsius. Research also shows that New England's forests could store two to four times more carbon if we just let them grow old.

This project must not go forward. It flies in the face of science, our agencies' legal responsibility per NEPA to adequately consider climate and other significant impacts in any project approval, and our USFS public servants' responsibility per Congressional mandate to serve the best interests of the American people.

Sincerely,