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Comments: I am an emergency physician who researches the health impacts of climate change. I am also a Vermonter and the father of a toddler who, with any luck, will be hiking the woods around Telephone Gap in 2100 -- the year often used to define the "far future" in climate models. I am writing to ask the US Forest Service to consider alternatives to the needlessly broad and destructive logging of old-growth forest proposed in the Telephone Gap Integrated Resource Project documents, which I have carefully reviewed. I would support either 1) a decision to take no action or 2) a decision to adopt an alternative plan that dramatically reduces the logging footprint of the Telephone Gap project.

We live in a time of climate crisis. President Biden has directed federal agencies to pursue an "all-of-government" approach to reducing carbon emissions, in keeping with US commitments under the Paris climate agreement. I would therefore respectfully ask that the carbon footprint of the Telephone Gap project be carefully considered. Has the USFS done a detailed, quantitative life-cycle analysis of the carbon emissions that would result from the logging that has been proposed, and comparing these emissions to those that would occur if the forest were allowed to continue growing undisturbed? Will this analysis be released to the public? Does this analysis take into account the latest science suggesting that, when left undisturbed, the temperate and boreal forests of the United States serve as significant carbon sinks, potentially reducing our annual national carbon emissions by 11%? (See, for example, Moomaw et. al., "Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good," *Frontiers in Forests and Global Change*, 11 June 2019.) If the answer to any of these questions is no, then the Forest Service should not proceed with the Telephone Gap project as currently envisioned.

Apart from climate impacts, the Forest Service must also account for the biodiversity values of intact, old-growth forest. On January 27, 2021, President Biden issued an "Executive Order on Tackling the Climate Crisis at Home and Abroad," which in Section 216 commits the federal government to conserving 30% of America's land and waters by 2030. This executive order was backed by sound science showing that large, intact ecosystems are critical to allowing the biosphere to respond to the pressures of climate change. Has the Forest Service shown that allowing extensive logging operations in one of the wildest and most remote parts of the Northeast would align with this 30x30 goal, promoting intact habitat and biodiversity? If not, then the Forest Service must reject the Telephone Gap project as currently proposed.

Finally, I would ask the Forest Service to consider the human impact of logging some of the oldest forests in Vermont. Very little of the Northeast is old-growth forest, and the small islands of intact forest that we have are precious. People from all parts of the globe and all walks of life use these forests for exercise, for recreation, and for quiet appreciation of their natural beauty. I can speak from my own experience as a backcountry skier and say that widely-spaced old forests are absolutely ideal for the growing sport of backcountry skiing, while cut-over and degraded forests are useless and impassible. Backcountry skiing, hiking, and other forest-based recreation activities are absolutely critical to Vermont's tourism economy. In 2022, tourism contributed over \$3.2 billion to Vermont's economy, according to data from the Vermont Agency of Commerce and Community Development. By contrast, the forestry industry contributed approximately \$43 million to Vermont's gross state product in 2017, according to data from the Northeast-Midwest State Forester's Alliance -- meaning that Vermont's forestry industry has approximately 1-2% the total economic impact of tourism. Tourism and forestry can and should co-exist. But a project like Telephone Gap, which would cut old-growth forest and therefore severely impair an otherwise highly valuable recreational/tourism resource, could easily destroy orders of magnitude more jobs than it creates. As someone who cares about protecting the livelihoods of my fellow Vermonters, I would ask that the Forest Service not proceed on the Telephone Gap project until it has conducted a comprehensive economic analysis proving that the project would create more jobs than it destroys.

Finally, a personal note. The forests that would be cut in the Telephone Gap project are very old -- some of them have been growing undisturbed for more than 150 years. If they are allowed to continue growing, then within the lifetimes of people who are young children today, they will be functionally equivalent to the old-growth forests that covered most of Vermont prior to European colonization. I would like my daughter to be able to experience Vermont's forests as they were before large-scale human disturbance. Allowing these trees to grow is an investment in our children's future -- a commitment to passing on a world that is wilder, healthier, more biodiverse, and more beautiful than the one we inherited from those who came before us.