

Data Submitted (UTC 11): 3/12/2023 9:10:15 PM

First name: Rachel

Last name: Smolker

Organization: Biofuelwatch

Title: Codirector

Comments: The Telephone Gap Integrated Resource Project is based on a 2006 forest plan that is grossly outdated in its' approach to forest management. In the 17 years since 2006 our understanding of forests has greatly advanced. We now have a much greater understanding of their key role in regulating our climate. We now know that mature and old growth forests in particular store vast amounts of carbon and play a key role in maintaining healthy forest ecosystems overall, essential to providing us with clean water and air. We also have a much greater knowledge base about the impacts of logging - including how it not only releases the carbon stored in trees that are harvested, but also results in oxidation of soil carbon stores, which in turn inhibits regeneration. We also have learned a lot about the impact of invasive species and how they can be introduced through logging disturbances. Meanwhile, both in Vermont and globally, we have lost and degraded forests to an alarming degree. Climate change has escalated to a point where we risk driving our own species (much less the rest of life) to extinction if we do not take every possible bold effective action immediately. Protecting and restoring forests is one of the few well-proven approaches we have in hand, and has multiple ancillary benefits. Protecting and restoring forests does not "need" logging.

Logging plans for Telephone Gap would include over 10,000 acres of forest classed as mature and old growth, threatening to undermine the goals put forward in President Biden's 2022 Executive Order 14072 - to protect remaining mature and old growth forests. Furthermore, the federally listed endangered northern long-eared bat has been found in the Telephone Gap project area - another reason why logging should not be permitted.

The logging plans for Telephone Gap, like other projects in the GMNF are based on long outdated concepts about forests and climate. The time has come for the USFS to update its' operating mode and put the restoration and preservation of our precious forests, allowing them to grow old without disturbance, to fulfill their potential as carbon sinks and as intact ecosystems as a top priority. Doing so would serve the greatest public good.