

Data Submitted (UTC 11): 3/13/2023 2:33:20 PM

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Comments: I oppose the implementation of the Telephone Gap Integrated Resource Project. The plan is a timber-centric, outdated document that fails to address climate change and will result in the needless destruction of nearly 12,000 acres of forest.

Like the Vermont Department of Forests, Parks and Recreation, the U.S. Forest Service is promoting a dramatic increase in logging on public lands over the next decade and a half. Both agencies use the tired, erroneous claims that these "treatments" will make our forests more diverse and resilient to climate change. They will not. Harvesting will make our forests less resilient to climate change, they will emit huge amounts of carbon, and they will set our forests backward for nearly a century in terms of carbon storage and climate resilience.

It is frustrating that both VT FP&R and the Forest Service claim that timber harvesting will be beneficial to wildlife. This old saw was recently shown to be largely false. In 2022, Betts et al. demonstrated that forest harvesting resulted in widespread declines in avian habitat and populations among nearly all species of birds, including those that were expected to benefit from harvesting. This was a longitudinal study looking at decades of data.

We are living in a global climate crisis. This past winter has been one of the warmest I can remember in my 30+ years in Vermont. We need to stop forestry business as usual and take a different approach to how we manage our public lands.

One of the biggest problems with VT FP&R and the U.S. Forest Service is their complete silence on the issue of old-growth forests. The amount of old-growth forest in Vermont is negligible. It is a missing seral stage. And a critical seral stage. Old-growth forests store huge amounts of carbon, provide refugia for flora and fauna, mitigate flooding in events such as hurricane Irene, and make ecosystems more resilient to climate change. Until VT FP&R and the U.S. Forest Service address the need to set aside lands for the restoration of old-growth forests - at scale - neither agency will have any credibility with the public.

I have hiked in the woods above Chittenden Reservoir. There are well-stocked stands of 28 inch to 32-inch DBH hardwoods in this area. These are precisely the older, mature forests that the Biden administration seeks to protect under executive order 14072. If left to themselves for several hundred years, these stands will become stunning examples of old-growth hardwoods, eventually reaching diameters of four, five or even six feet.

We taxpayers fund the Forest Service and FP&R. You are cutting our trees, on our lands. And you are selling those trees for pennies on the dollar and many of those trees end up being shipped to Canada or Asia. Your jobs, as public servants, are to make decisions that benefit most of the population. That means reducing harvests and restoring old-growth forests. If implemented, the Telephone Gap project will be a tragedy for all Vermonters, particularly the generations to come.

Betts, M. G., et al. 2022. Forest degradation drives widespread avian habitat and population declines. *Nature Ecology & Evolution*, 6, 709-719.