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First name: Geoffrey

Last name: Gardner

Organization:

Title:

Comments: As a person who has visited and explored the National Forests all across the U.S. and as a citizen concerned daily with the immediate problem of the crisis of global climate change, I am writing to oppose the Telephone Gap Integrated Resource Project. As proposed by the Green Mountain National Forest the project is ill-timed and ill-conceived and is likely to do more harm than good both in the short term as we face impending climate tipping points and over the long range as forest ecosystems struggle to restore and maintain their balance .

The Telephone Gap project is based on the 2006 Green Mountain National Forest Land and Resource Management Plan. Because this plan, underlying the Telephone Gap proposal, gives extremely short shrift to the climate crisis, it was seriously out of date even before it was published. The plan mentions climate change twice only: on page 33, where it proposes evaluation of plantations of yellow birch, sugar maple, butternut and American chestnut trees, useful for climate change research, and again on page 124, where measurable monitoring of changes in ecosystem components within the context of climate change is set out as a planning requirement. There is nothing more on climate change in the 2006 Forest Plan.

The Telephone Gap proposal attempts to do better despite the absence of guidance in the 2006 GMNF Forest Plan. On pages 10 and 11, the proposal concludes the Forest Habitat section by noting that Forest Service plans are meant to be proactive, providing for "healthy and diverse ecosystems that successfully adapt to changing conditions and mitigate climate related effects." The aim is to balance "the role forests have in countering carbon emissions through their carbon sequestration and storage capacity with the need to address declining forest health and lack of habitat diversity within the project area." The forests of Telephone Gap are characterized as being too uniformly old and too lacking in habitat diversity. As the plan moves directly into the Timber Resource section the climate mitigation goal is lost almost at once and quickly seems to have been little more than lip service. While often citing the need for climate adaptation, the aims and methods of "treatment" proposed for Telephone Gap are virtually identical to the aims and methods laid out in the 2006 GMNF Forest Plan which was concerned hardly at all with climate change and the role of forests in our effort to deal adequately with the climate crisis.

The plan is to log 11,800 acres of Telephone Gap, most of which is northern hardwood forest. By the GMNF's own definitions and estimates 92% of Telephone Gap is mature or old forest (Table 4, p. 9). What is most notable and truly rare is that the trees on 2,095 acres are 120 or more years-old, and about 477 of these acres proposed for harvest support trees between 150-160 years old (Page 37). Clearcuts or shelterwood harvest of trees older than 120 years will occur on close to 500 acres. Forests this old are extremely rare in Vermont. The concentration of so many trees of this age marks Telephone Gap as a truly unique area. Clearcuts of more than an acre or two do not just remove trees. They also destroy the soil ecosystems that supported those trees before the cut. It's hard to imagine how this constitutes a best practice for forest health, maintenance of biodiversity and climate mitigation.

Still harder to imagine is that anyone, contrary to the growing consensus of the most recent science, still believes as those who prepared the 2006 Forest Plan did, that cutting and removing marketable trees in order to grow more marketable trees as quickly as possible is wise forest management. The best recent climate science is clear: the large trees of mature and old forests, like the trees and forests of Telephone Gap, will accumulate and store far more carbon over the next 30-50 years than the younger trees that may replace them if they are cut. And these next 30 to 50 years will be the most critical period for climate mitigation. The proposal makes no effort to calculate the lost carbon storage capacity of the logged forests over these coming decades. The GMNF proposal for Telephone Gap also does not assess the carbon stored at present in the forests to be logged, most of which -as much as 40-60%-- will go directly and quickly into the atmosphere when these trees are processed to become paper or are burned as biomass to generate electricity. Nor does the proposed plan calculate the

amount of carbon added to the atmosphere by the fossil fuels that will be burned to harvest, transport and process the trees removed from Telephone Gap. The proposed plantation of warm climate trees as an adaptation measure will count very little against the carbon and climate consequences of the logging planned for Telephone Gap.

The timing of this removal of mature and old trees as we approach our confrontation with climate tipping points over the next several decades is terrible. No less terrible is the sense of timing embodied in the proposal's impatience to create a better forest more able to adapt to and mitigate climate change than the forest that is Telephone Gap right now and will become a still older, carbon richer and better climate adapted forest if we allow it to continue to age and find its own balance over the next many decades. The Telephone Gap plan, then, is ill-timed in two ways. It's careless of the immediate urgency of our climate crisis that demands that we let the mature and old trees of Telephone Gap go on growing and accumulating carbon above and below ground. And it's just as careless about the slowness of the length of time needed for large intact forests to find the balance necessary for them to maximize biodiversity as well as climate mitigation and resilience. In short, this is a forest plan ill-timed because it follows the pattern of 2006 and earlier decades when timber harvest and the timber economy, far out of balance, dominated all the other values available in publicly owned forests.

The dominance embedded in the Telephone Gap plan of commercial value above all else is even more out of balance today. Contrary to this, on Earth Day 2022, not quite a year ago, President Biden issued Executive Order 14072, requiring federally owned forests be managed "to promote their continued health and resilience; retain and enhance carbon storage; conserve biodiversity; mitigate the risk of wildfires; enhance climate resilience; enable subsistence and cultural uses; provide outdoor recreational opportunities; and promote sustainable local economic development." The order requires the Secretary of Agriculture to "define, identify, and complete an inventory of old-growth and mature forests on Federal lands, accounting for regional and ecological variations, as appropriate, and shall make such inventory publicly available." Once this work is completed the order requires the Secretary to "develop policies, with robust opportunity for public comment, to institutionalize climate-smart management and conservation strategies that address threats to mature and old-growth forests on Federal lands." The order recognizes not only the importance of old growth forests, but it requires action to manage mature and old forests for climate resilience and so that more of them might also grow to achieve old growth conditions. One of the failures of the Telephone Gap Integrated Resource Plan is that while it is proud to avoid intruding on its relatively few acres of true old growth forest, it adopts an aggressive logging program which will all but foreclose the possibility of mature and old trees ever growing to reach old growth conditions. Moving ahead with the Telephone Gap proposal before the new federal policies are developed seems to be an act of unaccountable imprudence.

The strategy of over-weighting the commercial value of the proposed logging of Telephone Gap is far out of proportion in another way. Logging on public lands accounts for only about 4% of commercial timber harvesting in Vermont. All the other 96% of commercial logging occurs on privately owned forestland. The commercial value of logging on public land is relatively small, really just a tiny drop in a large bucket. Place this value against even the monetary value, let alone all the other values, of preserving Telephone Gap from the cutting proposed in this plan, and you have a portrait of what economic value fetishized looks like. To many observers and opponents of this plan, it begins to look a lot like an aggressive kind of life and nature defying madness.

What then are the other values that will be lost if this proposal surges ahead in spite of reasonable public opposition? The plan mentions but does not explain in detail how the project will be mindful of threatened and endangered species living within Telephone Gap. Without further proof to the contrary, the proposal seems to place these species at increased risk. Headwaters of Otter Creek and the White River are threatened by the logging and road building planned under this proposal. This in turn poses risks to Lake Champlain and the Connecticut River. The Telephone Gap forest's ability to store water and mitigate both drought and flooding will also be at risk. Some 2,600 acres of logging are proposed within the 16,000 acre Pittenden Inventoried Roadless Area, the second largest such area in the Green Mountain National Forest and one of the most extensive wildlands in all of Vermont.

For all these reasons, the Telephone Gap Integrated Resource Project should not go forward.