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Comments: I am a resident of Rochester writing to express my concern about the Telephone Gap Integrated Resource Project. In particular I feel that the proposed project action makes a number of inaccurate assumptions, and relies on an outdated scientific methodology and analysis.

The areas proposed for logging, especially clear cutting, shelterwood, thinning and group selection 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. The Forest service biological and forest analysis relies on out dated and inaccurate ecological models which incorrectly over value young forests, specifically what you refer to as regenerating age class (0-9 years old). The Green Mountain National Forest has greater carbon density than most forests in the Eastern US, and the Biden Administration has ordered a survey of all old growth forests within the national Forest System. To plan for extensive clear cutting of older trees, in favor of younger growth, while that survey and executive order are still being carried out is both misguided and needlessly destructive.

The management plan also places too much emphasis on short term job creation and economic benefits, while ignoring long term climate mitigation and planning. The International Panel on Climate Change (IPCC) states that we must cut global warming pollution in half by 2030, and reduce to "net Zero" emissions by 2030. Research also shows that New England's forests could store two to four times more carbon if we just let them grow old. And yet the Forest Service has already approved 40,000-acres of logging over the next 15 years, more than at any point in the past 30 years.

The oldest 1% of trees store 30% of all aboveground forest carbon in the US. We should not be spending our tax dollars to subsidize cutting old trees. I urge the Forest Service to keep this in mind as it decides on the usage plan and not to approve or include any large-scale logging project, clearcutting, or any logging of old growth trees.

Finally, I wish to argue a point of civics and public good, in addition to the climate and environmental concerns enumerated above. If you approve a management plan with wide spread clear cut, thinning and group selection logging - especially dramatically more than has been approved in recent forest management plans - there will be a vocal, physical response.

People will travel to our small towns of Rochester and Chittenden from across the region and around the world to protect trees. And they will clash - at times physically and violently - with others who see it as their job and livelihood to extract the maximum number of board feet of timber from the forest. There will be tree sits, occupations of land, protests and rallies, and possibly tree spiking, property destruction, and the risk of physical harm to both protestors and to loggers. Our small towns and rural communities, and the local forest service staff, are not trained or equipped for this. I honestly believe you do not wish to be an armed escort for loggers and clear cut equipment. Nor do I want to face off with neighbors across a picket line, encampment, or tree sit. Look only as far as Atlanta Georgia and the current #StopCopCity fight over a (much smaller) tract of forest land (to be converted to a much more controversial police militarization facility) to understand how dramatic, escalated, and dangerous a situation that pits forest defenders against commercial logging and construction workers can become.

Nobody wants a forest war in Rutland and Windsor counties, Vermont. Please, do not declare one by imposing a plan that relies on logging and clear cuts as the only management tools.

Thank you for your consideration, see you in the forest.