

Data Submitted (UTC 11): 3/31/2024 5:21:17 AM

First name: Kate

Last name: Goetz

Organization:

Title:

Comments: I have grave concerns about the climate, biodiversity, and health and safety impacts of the proposed Telephone Gap Integrated Resource Project #60192.

Considering the level of public outcry one year ago over the proposed scale of reckless mature and roadless forest logging in the Telephone Gap project, I am alarmed that the Forest Service's Proposed Action to log nearly 12,000 acres has changed very little from the last version available for public review (these numbers reflect the total "stand acres" proposed for harvest).

The Telephone Gap timber sale has been called one of the ten worst projects in the U.S. by Climate Forests, a national coalition of 120 environmental groups. This highly destructive logging job would devastate an area larger than the City of Burlington, Vermont. It endangers the water quality of the White River and Otter Creek, puts downstream communities in greater danger of flooding, risks introducing invasive species, and destroys habitat needed by threatened and endangered species.

The landscape targeted for logging includes a vast, 16,000-acre "Inventoried Roadless Area" and forests with major concentrations of mature and late-successional trees between 80-160 years old. Roadless areas of this size are rare in Vermont and New England, and are especially important for biodiversity and clean water. Meanwhile, mature and late successional forests accumulate and store the most carbon in the fight against climate change compared to young trees. The Green Mountain National Forest has older, healthier forests than most in New England; we should manage this public land for the benefit of the climate, clean water, and biodiversity, not cut it down.

Public lands like the Green Mountain National Forest contain, on average, 30% or more carbon than private lands in the Northeast US. We should not be spending our tax dollars to subsidize cutting mature and old trees in public forests at the expense of the climate. Young people and future generations will bear the brunt of the climate catastrophe that is happening all around us. The International Panel on Climate Change states that time is running out for action. On the global scale, forest protection represents approximately half or more of the climate change mitigation needed to hold temperature rise to 1.5 degrees Celsius. Research shows that New England's forests could store two to four times more carbon if we let them grow old. Letting mature forests grow old on public lands is one of the most effective ways that New England forests can contribute to the global fight against climate change. We must put our public forests on a different path.

Historically, old-growth forests dominated the New England landscape, supporting native biodiversity and rich indigenous cultures. In a short period of time, these remarkable forests - and the species and cultures that grew from them - were eliminated (or nearly-so) from our region by European settlers and their descendants. Old forests are exceptional for sequestering and storing vast amounts of carbon, protecting water quality, and mitigating droughts and floods. Today, just 0.3% of New England forests are older than 150 years.

On Earth Day of 2022, President Biden issued an historic Executive Order directing the US Forest Service to conserve mature and old-growth forests to benefit the climate and biodiversity. The US Forest Service manages the majority of mature and old-growth forests across the US, and has an especially important role to play in helping to recover old-growth forest ecosystems in regions of the country where few exist, like New England. In response to President Biden's Executive Order, the Forest Service is conducting a process to amend the Forest Plans of every National Forest in the US. Why is the agency racing ahead with the Telephone Gap logging plan when agency priorities are poised for rapid change?

The Green Mountain National Forest is a bastion of biodiversity, a reservoir of clean water, a carbon-storage warehouse, and a refuge for people seeking to reconnect with the more-than-human world. The Telephone Gap Integrated Resource Project threatens these unique values.

For the benefit of our climate, our communities, and our non-human neighbors, please abandon or significantly modify the Telephone Gap IRP Modified Proposed Action to protect all mature and old-growth forests, as well as roadless forests that are critical for clean water and wildlife.