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Comments: Thank you for the extensive work that has gone into the planning and documentation of this project, and for the opportunity to comment. I have spent many hours studying the online materials, although I still find it difficult to get a clear picture of many issues.

I also attended the in-person presentation in Chittenden. I clearly remember being told there that none of the four alternatives included harvesting of old-growth forests. This assertion is repeated in the Preliminary Environmental Assessment: "No old growth forests as defined by the Forest Plan or Vermont state-designated old forests are proposed for harvest."

This came as a relief to me, as preserving mature and old-growth forests is the highest priority for me, both as a contribution to carbon storage to reduce climate change and as a growing reservoir of diverse ecosystems.

These goals seem to be aligned with the 2022 Executive Order 14072.

I was therefore somewhat shocked to see that even Alternative C includes shelterwood harvesting on stands with a year of origin as old as 1865. This seems to me to be completely contrary to the stated strategy, depending on the restricted state definition of "old growth." This confusing distinction was not made clear in the presentation, and I find this misleading.

I understand that the Forest Plan uses this restricted definition, but that Plan is 18 years old and overdue for update. It seems to reflect a historic emphasis on harvesting of forests, has no discussion of carbon sequestration and storage, and seems incompatible with EO 14072.

There has also been much learned in recent decades that is not reflected in the Forest Plan, so using it as a framework for evaluating the Telephone Gap project is highly problematic. The Preliminary Environmental Assessment seems to rely on the Forest Plan when it is convenient, but use other arguments when those match the goals.

I do appreciate the new analysis of carbon flows. However, it is important to recognize that the modest decrease in sequestration rates in very old trees does not change the fact that it takes years to recover loss of carbon storage due to harvesting, an issue that is still an area of active research.

I also worry that the stand-level goals of age class distributions reflect a harvesting-driven mindset. As is reflected in some parts of the documentation, small-scale disturbances can also open avenues for regeneration, but these opportunities seem to be lost in much of the coarse-grained analysis. Although it may complicate harvesting, I place lower value on that in public lands than on preserving age- and species-diverse ecosystems.

For these reasons, although I appreciate the extensive and thoughtful analysis, Alternatives B, C, and D still seem likely to soon appear out of touch with our rapidly evolving priorities. In the meantime, harvested mature and old forests would take decades to recover. I think we should not move forward with any of these management plans and stick with Alternative A: leave it alone for now.