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Comments: First, I believe that the US Forest Service must produce a more detailed Environmental Impact Statement to determine the true impacts of the proposed actions in the Telephone Gap Landscape. Further, many scientist (see Dominick Desalalla 2023 et al. <https://phys.org/news/2023-08-countering-false-omitted-evidence-historically.html>) have found a need for greater emphasis on protection and restoration for older forests. We know that logging actually increases forest's susceptibility to invasive species.

The Preliminary Environmental Assesment of the Telephone Gap managment plan says "Forested stand ... are sequestering carbon at a lower rate than their maximum potential" (p 9). While it may be true that young growing trees take up carbon at a higher rate than older trees, suggesting that older trees should therefore be logged is a gross misinterpretation of the available data. In fact a study by DellaSala et al. titled "Mature and old-growth forests contribute to large-scale conservation targets in the conterminous United States", leading scientists found that Mature and Old-Growth forests store exeptionally large amounts of carbon. So, while mature trees rates of sequestration are not increasing quickly, the amount of carbon they store is much higher than young trees. Logging mature, or future mature forests, and planting new trees will add vast amounts of carbon to the atmosphere. "If federal Mature and Old-Growth forests (MOG) are logged over a decade, and half their carbon stock emitted, there would be an estimated 0.5 ppm increase in atmospheric CO₂ by 2030, which is equivalent to ~9% of US total annual emissions." (Delasalla et al. 2022, <https://www.frontiersin.org/articles/10.3389/ffgc.2022.979528/full>)

It is also important to mention the profound biodiversity loss the logging included in this project would cause.

I implore you to select Alternative A, no action, to allow the Telephone Gap landscape to continue to grow old for the benefit of biodiversity and the climate. Protecting our MOG and allowing other forests to age is our best tool for climate resilience.

We appreciate the Forest Service for developing Alternatives C and D, and while they are a step in the right direction, they are not enough. In fact, these options are not in line with President Biden's Executive Order to conserve MOG. Please consider protecting all mature stands over the age of 80 in the Telephone Gap Landscape, and ultimately across the entire Green Mountain National Forest. This would help protect species such as the endangered Northern Long-eared Bat.

Further, please consider ending all logging in Inventoried Roadless Areas, including the Pittenden Inventoried Roadless Area. Logging there would cause habitat fragmentation, contaminate clean water, and increase flooding risk.

Personally, I am devastated by the continued disregard of MOG as one of, if not our best climate solution. These forests are doing so much for us, and all we have to do is let them be. This is our last chance to save the planet we live within. Please be responsible.