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Comments: I appreciate the efforts of the Forest Service in VT to carefully consider appropriate management of our forests. And, I acknowledge that the Telephone Gap Integrated Resource Project #60192 is a very complex one that has far reaching consequences. The concerns have been well outlined by many groups including Standing Trees and Climate Forests. While the Forest Service (FS) made some changes to the original proposal, they are minimal. I implore the FS to curtail the project in order to obtain more information and ultimately protect our mature forests.

As a scientist, schooled in biology, ecology, medicine and studies in epidemiology and statistics, I reviewed sections of the proposal. I noticed that the "Environmental Assessment" included a section, Resource Effects Not Included for Detailed Analysis. This section admittedly was only a brief summary without detailed analysis. We need more.

What seems clear is that this is a very complex project with FAR reaching consequences, potentially adverse, that are irreversible in the near future (and lifetime of many people working on it). It absolutely deserves more evaluation and deliberation. How can we fully assess the negative effects of losing these mature forests on carbon sequestration? Do we really have a clear number on this? As you know, there is much research in this area. Although some research hints at a slowing of carbon sequestration as forests get much older, more recent research argues against this: "Logging old-growth forests and replacing them with vigorous second-growth stands will not improve the forest carbon balance, at least in the short-term. For a second growth stand to recover the amount of carbon stored in a 300-year-old stand (i.e., to get back to the same carbon density per hectare) could take 200 years or more, therefore crucial short-term GHG mitigation objectives will not be met with this replacement strategy (Pojar, 2021)" I am sure you are familiar with older studies such as: Old-growth forests as global carbon sinks Sebastiaan Luyssaer et al, Nature, 455, pages213-215 (2008).

Please, please put the brakes on this extensive project to consider the irreversible effects. I agree with the statement from standing trees that, "The US Forest Service must produce a much more rigorous Environmental Impact Statement to determine the significance of its proposed management actions in the Telephone Gap landscape. An Environmental Assessment doesn't "cut it" with so much at stake."

While your alternatives C and D are an improvement over the initial proposal, clearly this project should be put on hold to consider the impact in more detail. We should be honoring the intent and purpose of Biden's, "Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies". This is in its infancy and needs to be assessed and applied rigorously.

We have an ethical obligation to do ALL that we can to mitigate the devastating effects of climate change and habitat degradation. Our children and grandchildren are depending upon our better judgement at every step along the way.

Thank you for considering this.

With gratitude for all your hard work.