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Organization:

Title:

Comments: Dear Mr. Mattrick,

I want to compliment the GMNF staff on the amount of good, professional work on the Telephone Gap Project in this Environmental Assessment round. This document encompasses a tremendous amount of work, and I believe it is much improved from the Scoping round. The multidisciplinary work involved is impressive. Compliments to Jay Strand for this huge editing job.

I hike and kayak in the GMNF and love our Forest for all the many benefits it brings us. In addition to the intrinsic biodiversity benefits of the forest, I am most concerned about the impact on its ability to mitigate climate change.

The new section on Carbon Sequestration and Greenhouse Gas Emissions is an excellent improvement to the document. The analysis is comforting about the long-term impact of the Telephone Gap project on carbon storage and sequestration. However, the immediate future of 5 to 20 years is of critical importance in our ability to bring climate change under control and keep our planet livable and stable. The preponderance of research, including a synthesis by Law and Moomaw of 93 papers with over 200 contributing researchers, shows that old forests sequester and store the most carbon; and forests that are cut become net sources of carbon to the atmosphere for approximately 10 to 20 years depending on forest conditions. This is the most critical time period for bringing the climate under control. We are staring down the barrel of a climate disaster, and we need every bit of help we can get from the forests to turn this around in time. Every bit of logging of older trees that we don't do helps us in that fight.

Scientists have been warning for decades that we would face a "tipping point" of possibly no return if the global average temperature exceeded 1.5 degrees Celsius above the baseline. In 2022 it was projected we might exceed that as early as 2030 - a scary 8 years away then. Last year was the hottest on record and we nearly passed 1.5! In 2024 it is entirely likely we will pass that point. We won't all die above 1.5, but the worldwide and local damage will be huge, and it will be much harder and more expensive to bring it down if we overshoot that tipping point. Vermont has warmed an astonishing 7 degrees F in the last 60 years.

Ironically, as the land gets hotter and drier, the atmosphere becomes loaded with moisture (atmospheric rivers) and dumps it periodically in catastrophic floods such as we saw in Vermont last summer and the winter before in California. The insurance industry is struggling with mounting losses from fires, floods, and hurricanes; and many insurers are pulling out of California, Florida, and other states. My own insurance agent warns that this will be a growing crisis everywhere, as companies struggle to survive and refuse to insure properties or deny claims. The economic consequences of this for our nation are mind boggling.

We are beyond the 11th hour in the climate crisis, and I believe every sector of our economy must do its part to avoid disaster. The forestry sector is no exception, and we should do less logging in Telephone Gap. Failure is unthinkable, especially for the sake of our young people who will spend their entire lives in an increasingly chaotic world.

I have several specific comments that I wish to make:

1. I support Alternative A - no action beyond maintenance.
2. If you can't bring yourself to approve Alt. A, then I prefer Alternative D. The lower levels of harvest and the lessening of fossil fuel emissions are improvements over Alt. B, which seems to be the GMNF preferred option.

The Late Successional category is good to acknowledge the older forest characteristics and to preserve some of them. But why can't more of the maturing forests be reserved from logging so they can continue to age and become true Old Growth forests with so many increased benefits? As I understand the stand age maps, a huge amount of old and maturing forest will still be cut. Why can't this be lessened?

3. I still continue to take issue with the "desired forest condition" idea that we should cut older forest stands to achieve certain percentages of younger forests which don't sequester and store as much carbon and don't support the true biodiversity of maturing forests. That is an outmoded concept that should not apply during this climate crisis. That includes the Early Successional Habitat creation concept. We should not be cutting older forests for the benefit of game hunting (even though I have been a hunter most of my life, I don't agree with that use of public money.)

4. I also don't understand how you can propose logging in roadless areas that are supposed to be essentially wilderness areas, protected by the Roadless Area law.

5. Our GMNF Forest Plan was adopted in 2006 and is out of date. I understand that there will be a nationwide amendment to all Forest Plans in 2025. Why can't we wait for that nationwide change rather than plowing ahead with Telephone Gap. Please pause the decision on the Telephone gap project until at least 2025. I believe the next few years of increasing climate disasters will throw everything into panic mode, and we should not rush to approve Telephone Gap now.

6. Finally, it appears that many stands of 80-160 years old will be cut. I believe that our public forests should largely be areas of protection for older forests above 80 years in line with President Biden's executive order to protect old and mature forests.

Thank you for considering these comments,

Howard Jennings