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Title:

Comments: I am writing to express my objections to the GMNF logging planned for the Telephone Gap area. The costs and benefits of this project have not been full elaborated, and are glossed over - for example, impacts on wildlife such as the Canada lynx have not been evaluated, the true costs of logging vs economic benefits are not clear, the impact on flooding in the region as a result of logging has not been studied. It is also argued that the project will provide wood products for the local and regional economy, however significant portions of Vermont's wood is sent out of state or the country to Quebec for processing and consumption, and it is not clear how this project will be different in that regard.

I live on a piece of land at 1500' elevation that abuts GMNF not far from the Telephone Gap, and I know that we are very fortunate to have few invasive species here. I also know, however, that in recent years every time a patch cut or opening is created in the forest, honeysuckle, buckthorn and other invasives are moving in at a newly rapid pace. Why would we possibly open up older forest areas to invasives, the second leading cause of biodiversity loss after habitat destruction, according to the IPBES 2021 report, which we will then have to actively manage to allow our forest to regrow? What is all of this busy work costing the tax payers? First, we pay for subsidized road building, logging, and then years of clean up of invasives, and "managing" for old growth in forests the GMNF apparently has no intention of ever letting grow old.

The presumption that older, healthy forests don't know how to grow even older without the help of people harvesting trees is scientifically unproven despite the forestry community's attachment to it. It is difficult to believe that in 2025 we are told by the forestry community that, all evidence to the contrary, man knows better than forests and nature how they should mature and evolve. This is religion, not science.

Additionally, the arguments for logging 817 acres of old growth forest seem to be that there is more that will not be logged, which is a strange argument and inadequate in a time when older forests control flooding, create high quality water, and are proven to store and sequester significant amounts of carbon. Shouldn't we be conserving the very small percentage of older and old forest that we have, letting them grow even older, rather than serving a short term special interest?

As the Vermont Department of Forest, Parks and Recreation identified, an acre of an average forest (not old, which stores and sequesters more) stores 1.3 Mt CO2, and continues to sequester more over time. The entire Telephone Gap logging will release 254, 556 tons of CO2, the same as 60,000 passenger vehicles a year.

The economic cost-benefit analysis of this project is also not clear - how much is the GMNF investing in roads and other infrastructure, not to mention the costs of this lengthy battle with a public that does not support this project, compared with what they receive in return from the wood products harvested? Who does this serve? How many jobs will be produced, compared with those of the tourism and recreation sector? This seems like an out of date mindset being applied to an area that deserves better. Please reconsider your plans for the Telephone Gap.