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Comments: I wish to register my strongest objection to the Telephone Gap Integrated Resource Project #60192.

As I stated in my previous objection, Vermont is sorely lacking in MATURE and OLD GROWTH forests. Such forests (over 150 years old) cover a mere 0.3% of New England, almost exclusively in the Adirondack and Catskills. It makes no sense that the Telephone Gap project would cut 817 stand-acres of Old Growth, when only 0.5% (2,000 acres) of the entire 400,000 acres of Green Mountain National Forest is Old Growth.

Less than 1% of original Old Growth forest remains in the eastern US.

I wish to add to my previous comment:

In 2022, President Biden issued an Executive Order directing the US Forest Service to conserve mature and old-growth forests to benefit the climate and biodiversity. In response Forest Service cancelled a timber harvest in Oregon. What is the rationale for not cancelling the Telephone Gap project?

I am personally extremely concerned about the harm that would be done if this project goes forward. Logging the Telephone Gap forest will do a lot of harm. It will release 254,566 tons of CO<sub>2</sub>e, at a time when Earth has exceeded the climate change benchmark of 1.5 degrees C of warming above preindustrial levels, for the 12 months from Feb 2023- Jan 2024. This is an early sign of a perilous approach to exceeding the long-term limit. Government, including the Forest Service, must act immediately to stabilize this dangerous trend by ceasing to engage in carbon-releasing activities.

I am very concerned that this project will contribute to a repeat of the devastating floods VT has endured recently, since climate change is intensifying rainstorms. The Telephone Gap project aims to destroy 11,800 acres of mostly mature and old-growth trees. Forests typically absorb up to 18 inches of precipitation before releasing it gradually to natural channels, while deforested land has little ability to absorb stormwater runoff. In the context of magnified runoff, this massive logging scheme will also endanger the water quality of the Chittenden Reservoir.

There are reasons to retain and increase the acreage of Old Growth. They act as reservoirs of biodiversity that is unique to Old Growth forest, a biodiversity that has been practically eliminated in Vermont. They contain a high degree of structural diversity that harbors animals such as the endangered long-eared bat, and other species dependent on mature and Old Growth habitat. More carbon and nitrogen is retained in an old-growth forest than in forests of other age classes.

I also object to the statement by the Forest Service that "the gray wolf and Canada lynx are not known to occur within the project area on the GMNF, [and] they are not likely to occur within the project area in the foreseeable future." How can you support this claim when a Canada lynx was seen on camera outside the Green Mountain National Forest headquarters in September 2024? The Forest Service must abandon its out-of-date, 20-year old plan for Telephone Gap, re-inventory the entire area and come up with a new Biological Evaluation that incorporates the value of the forest for climate mitigation, rare, threatened and endangered species, watershed protection and provision of wilderness area.