

Data Submitted (UTC 11): 1/14/2025 8:51:21 PM

First name: Rachel

Last name: Smolker

Organization: Biofuelwatch

Title: codirector

Comments: Comment re Telephone Gap Integrated Resource Project #60192

Submission on behalf of Biofuelwatch

Prepared by Rachel Smolker, Ph. D.

January 14 2025

NOTE: I submitted a comment earlier on behalf of Biofuelwatch, an international organization for which I serve as codirector. The earlier comment does not however appear in the "consideration of comments recieved". The earlier comment is attached below this current comment.

As a resident of Hinesburg, I visit the Telephone Gap area regularly and consider it is one of the most beautiful and unspoiled areas in our National Forest with many stands of old and mature forest that are a rarity in Vermont and New England. Maintenance of existing trails and facilities makes some sense, but logging does not. It is especially concerning that the management plans - so outdated - continue to be largely driven by commercial interests and a failure to accurately take account of climate science, in spite of lip service offered.

As codirector of an international organization that has long opposed burning woody biomass for electric power, I am outraged to find that the final EIS states: ""Timber harvesting also provides high-quality sawtimber and other timber products on a sustained yield⁵ basis (Forest Plan, Goal 8, p. 14; and Diverse Forest Use Management Area major emphasis, p. 47), supports regional and local economies through resource production (Forest Plan, Goal 17, p. 17), and provides a source of renewable wood products and fuels that can displace more carbon-intensive products, such as fossil fuels, concrete and steel. "

National Forests belong to the public, not to any commercial interest. The construction, steel making industries, wood product producers and energy utilities profiting from subsidies for renewable energy, are private, not public interests. The greatest good our national forests can provide to the public at large is as a reservoir of carbon, as habitat for precious wildlife including the Canadian Lynx, an endangered species known to reside in Telephone Gap region, and as a place for people to visit and experience undisturbed natural forests.

The claim that "renewable" wood products and fuels are less carbon intense than fossil fuels, concrete and steel is simply and egregiously wrong, outdated and fails to account for a history of well documented scientific research. Burning wood for electricity, for example has been shown to emit as much as 150% more carbon into the atmosphere at the smoke stack than burning coal, per unit of energy generation. Furthermore it undermines existing sequestration of C in forests where harvesting occurred. Many scientists have rigorously detailed these measurable facts and expressed them with clarity and conviction. A 2021 letter (attached) to policymakers signed by hundreds of scientists states "The result of this additional wood harvest is a large initial increase in carbon emissions, creating a "carbon debt," which increases over time as more trees are harvested for continuing bioenergy use. Regrowing trees and displacement of fossil fuels may eventually pay off this carbon debt, but regrowth takes time the world does not have to solve climate change. As numerous studies have shown, this burning of wood will increase warming for decades to centuries. That is true even when the wood replaces coal, oil or natural gas."

Another letter (attached) in 2020 signed by over 200 scientists states: "Furthermore, the scientific evidence does not support the burning of wood in place of fossil fuels as a climate solution. Current science finds that burning trees for energy produces even more CO₂ than burning coal, for equal electricity produced (Sterman et al. 2018), and the considerable accumulated carbon debt from the delay in growing a replacement forest is not made up by

planting trees or wood substitution (noted below). We need to increase growing forests to more rapidly close the gap between emissions and removal of CO2 by forests, while we simultaneously lower emissions from our energy, industrial and agricultural sectors."

Let's stop pretending logging is somehow a "solution" to our climate and biodiversity crises. Telephone Gap is a treasure belonging to all of us and should be left free from the reign of chainsaws and free to provide the greatest good to all.

For the record: prior comment filed in March 2023:

The Telephone Gap Integrated Resource Project is based on a 2006 forest plan that is grossly outdated in its' approach to forest management. In the 17 years since 2006 our understanding of forests has greatly advanced. We now have a much greater understanding of their key role in regulating our climate. We now know that mature and old growth forests in particular store vast amounts of carbon and play a key role in maintaining healthy forest ecosystems overall, essential to providing us with clean water and air. We also have a much greater knowledge base about the impacts of logging - including how it not only releases the carbon stored in trees that are harvested, but also results in oxidation of soil carbon stores, which in turn inhibits regeneration. We also have learned a lot about the impact of invasive species and how they can be introduced through logging disturbances. Meanwhile, both in Vermont and globally, we have lost and degraded forests to an alarming degree. Climate change has escalated to a point where we risk driving our own species (much less the rest of life) to extinction if we do not take every possible bold effective action immediately. Protecting and restoring forests is one of the few well-proven approaches we have in hand, and has multiple ancillary benefits. Protecting and restoring forests does not "need" logging.

Logging plans for Telephone Gap would include over 10,000 acres of forest classed as mature and old growth, threatening to undermine the goals put forward in President Biden's 2022 Executive Order 14072 - to protect remaining mature and old growth forests. Furthermore, the federally listed endangered northern long-eared bat has been found in the Telephone Gap project area - another reason why logging should not be permitted.

The logging plans for Telephone Gap, like other projects in the GMNF are based on long outdated concepts about forests and climate. The time has come for the USFS to update its' operating mode and put the restoration and preservation of our precious forests, allowing them to grow old without disturbance, to fulfill their potential as carbon sinks and as intact ecosystems as a top priority.