

Data Submitted (UTC 11): 3/8/2023 4:32:13 PM

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Comments: Dear Managers of our forests.

Apparently, just like your counterparts on the White Mountain National Forest, you have chosen to ignore President Biden's Executive Order regarding an Inventory of "Mature and Old Growth" trees which is due next month. Instead you have chosen to speed up the harvesting of these same trees.

The purpose of the ordered inventory is to locate, quantify and preserve these older trees that unbiased science (not the logging and hunting industry propaganda) tells us are our best hope to avert the worst results of climate change.

The areas you have proposed for logging have major concentrations of trees between 80-160 years old, which science shows accumulate and store the most carbon in the fight against climate change compared to young trees. The Green Mountain National Forest has greater carbon density than most forests in the Eastern US; we should manage this public land for the benefit of the climate and biodiversity, not cut it down.

The largest 1% of trees store 30% of all aboveground forest carbon in the US. We should not be spending our tax dollars to subsidize cutting old trees. Our children and grandchildren alive today will bear the brunt of the climate catastrophe that is happening all around us. The International Panel on Climate Change states that time is running out for action. On the global scale, forest protection represents approximately half or more of the climate change mitigation needed to hold temperature rise to 1.5 degrees Celsius. Research also shows that New England's forests could store two to four times more carbon if we just let them grow old. Letting these old trees stand is one of the most effective things that Vermonters can do. We must put our public forests on a different path.

Mature and old-growth forests excel at removing and storing carbon from the atmosphere. And yet, 92% of the areas proposed for logging in the Telephone Gap timber sale are classified as mature or old by the Green Mountain National Forest, violating President Biden's historic executive Order from Earth Day 2022, which directed the US Forest Service to protect these forests for the benefit of the climate and biodiversity. In December, the US Forest Service withdrew a timber sale in Oregon called "Flat Country" because it targeted mature forests of up to 150 years in age. Telephone Gap proposes logging forests up to 160 years in age. If Flat Country was important to withdraw, why is the Telephone Gap timber sale moving forward?

If , in addition to subsidizing the logging industry, your rationale for clear cutting older trees includes the promotion of wildlife, what about the Northern Long Eared Bat? The Northern Long-eared Bat is a species that is teetering on the edge of extinction. The US Fish and Wildlife Service listed the bat as "endangered" in November 2022. The Northern Long- eared Bat prefers mature and old-growth forests for roosting and foraging - exactly the sorts of areas that are proposed for logging. Much of the Telephone Gap project area is suitable habitat for this endangered bat.

Forest-clearing to Create Early-successional Habitats:

Questionable Benefits, Significant Costs

A new paper co-authored by RESTORE's Michael Kellett was published in January 2023 in the peer-reviewed journal, *Frontiers in Forests and Global Change*. The paper reviews and assesses the growing campaign to clear established forests to create early-successional (or "young forest") habitats through clearcutting, "patch" cutting, burning, herbicide applications, mulching, and other intensive forest management. This practice is widespread on public lands across the Northeast and Upper Great Lakes regions of the U.S.

Advocates contend that forest-clearing is needed because young forest habitats are disappearing and species that depend on them are disastrously declining. However, authors of the paper concluded that there is little evidence to support this claim. On the contrary, clearing established forests undermines the recovery and protection of rare old-growth forests, worsens climate change, and degrades vital green spaces needed for public

health and well-being.

The paper recommends dramatically expanding parks and preserves protected from logging and other resource development, ending the clearing of forests for wildlife on public lands while maintaining existing early-successional habitats as appropriate, and encouraging private landowners to protect forests as much as possible.

The Telephone Gap Integrated Resource Project (TGIRP) should be abandoned in its entirety.