Data Submitted (UTC 11): 3/12/2023 8:53:34 PM First name: Nancy Last name: Gaudreau Organization:

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Comments: I want to be sure you have seen the Spring 2023 issue of Northern Woodlands. They are starting a four part series on forest carbon. Alexandra Kosiba starts with an explanation of storage vs sequestration. There seems to be a lot of confusion about sequestration so this is helpful. Also the importance of managing for "resilient carbon" rather than maximizing storage or sequestration alone. A top strategy for this is to preserve old trees. Also designate no cut zones, increase deadwood, create gaps, thinning, promote species diversity and structural complexity. Much of this you are doing as part of the Telephone Gap IRP from my read thru of the project. I hope your emphasis is on developing resilience/diverse ages & amp; tree types/preservation of older stands rather than enhancing commercial value. I can't tell if this project favours one or the other. I would prefer to see the cutting limited to only the areas that are ecologically compromised and younger in age, like an area with extensive beech bark disease or a stand of non-native red pine. As to timber harvest, I don't think you can control where the wood goes once it is cut (possibly out of state?) and durable wood products have an average lifetime of 50 years, far less than a tree (The Climate Book). And this: "for biomass to be sustainable and renewable, we need to significantly downscale the entire practice. Burning wood releases more CO2 than burning coal...(The Climate Book).