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Comments: Dear Forest Service,

Thank you in advance for reading my objection to the misguided plan to timber the Telephone Gap in Vermont. I have been attending multiple DEEP Forestry and Governor's Council on Climate Change (GC3) Meetings in Connecticut. The action plans being made by the Forest Service in the northeast do not reflect the emphasis on Natural Climate Solutions strategies that distinguished climate scientists, ecologists, and more are urgently recommending. Forest Service action plans should be based on the recognition that northeastern forests allowed to grow old will double the huge amount of carbon they are currently storing and will continue to increase the massive amounts of carbon they sequester as they age. In addition, reserving forest to grow old increases their resiliency in the face of the climate crisis while providing critically needed habitat to preserve biodiversity. Thus, our intact public forests should be reserved to perform their greatest good (serving as a Natural Climate Solution) to their maximum potential (reserved to become Old Growth) as President Biden is directing. This is also what Climate Scientist Bill Moomaw, Professor Susan Masino, and Senior Ecologist Edward Faison urge in their report: Intact Forests in the U.S.: Proforestation Mitigates Climate Change and Serves the Greatest Good <https://www.frontiersin.org/articles/10.3389/ffgc.2019.00027/full> Bill Moomaw was the lead author when the Intergovernmental Panel on Climate Change won the Nobel Peace Prize and all three of these authors are highly accomplished and distinguished.

A recommendation by Edward Faison, Senior Ecologist for Highstead Foundation, in his April 7, 2020, presentation to CT's GC3 includes to: "Set aside a lot more forest land as Unmanaged Reserves to store the most carbon (climate mitigation) and to create the most complex and diverse forests (climate adaptation) [...]"

Ed Faison reports that Reserved or "Unmanaged" Forests:

- store more carbon and have:
- greater structural complexity
- greater tree species diversity
- greater density and diversity of forest birds
- fewer invasive plant species
- less risk of fire severity

than "Managed" Forests. The Telephone Gap is an example of the type of forest to preserve so it can continue to do the most good for the public. It is storing several dozens of tons of carbon per acre and this will continue to increase as it ages, all the while serving as needed habitat for biodiversity while creating clean air, healthy soils, preserving / filtering water, and providing mental and physical benefits for people who visit.

Of course, the Telephone Gap and other reserved forests will still require knowledgeable caretakers. Thus, forestry service jobs could be shifted from timbering towards:

- *assessing the amounts of carbon being stored,
- *controlling non-native invasive plants,
- *reforesting and afforesting vacant land,
- *working with private landowners to keep their land undeveloped and untimbered
- *other efforts serving the public good

To increase the amount of forest land being spared from development or timbering, another important action would be to implement yearly Ecosystem Service Payments to private land owners based on the amount of carbon stored. These payments would do much to slow or prevent deforestation as well as preserve coastal land and more. Other actions to implement alongside the reduced amount of timbering are to

- *require / encourage greater reuse / recycling of wood products,
- *repurpose existing developed areas for current needs instead of developing natural areas,
- *use "low-carbon concrete" in construction, and
- *require carbon neutral construction (by preserving natural land that takes in and stores carbon to offset carbon emissions of construction and development).

In summary, I quote Climate Scientist Bill Moomaw, Senior Ecologist Ed Faison, and Professor Susan Masino :
"Proforestation "[...] is the only practical, rapid, economical, and effective means for atmospheric CDR [carbon dioxide reduction] among the multiple options that have been proposed because it removes more atmospheric carbon dioxide in the immediate future and continues to sequester it long-term. Proforestation will increase the diversity of many groups of organisms and provide numerous additional and important ecosystem services."
Practicing proforestation and reserving large amounts of public forest to become old naturally is the most immediate and effective way we can help address both the climate and biodiversity crises and our Forest Service action plans must reflect this. I appreciate your attention in this important matter and ask that the Telephone Gap forest be allowed to grow into Old Growth as President Biden directs.

Sincerely,

A caring and concerned person who hopes we can prioritize actions to stop the climate crisis.