

Data Submitted (UTC 11): 3/6/2023 5:08:21 PM

First name: Dylan

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Organization:

Title:

Comments: Dear sir or madam,

I would like to express the New Jersey Highlands Coalition's opposition to the logging project proposed for Telephone Gap in Green Mountain National Forest. The New Jersey Highlands Coalition is recognized as a leading think-tank in New Jersey and the northeastern region on public forest management policy. What we and our science advisory panel have learned in delving into the sustainability of logging on public forestland is that it puts our communities which rely on these forests for clean water, climate resilience and recreation at significant risk.

These risks include:

- 1.) Significant impacts to water quality and quantity including both floods and droughts. The loss of plants, trees, organic soils and other structures which absorb and store water increases the frequency and severity of dangerous flooding events. Furthermore, the loss of the forest's ability to store water also increases the frequency and severity of drought, as without structures to store water, there is less water on tap during periods of low rainfall, which is becoming equally as common as major rain events such as those experienced in 2022. On steep slopes such as those for which Green Mountain National Forest is nationally recognized, the increased stormwater runoff increases the rate of erosion and potential for mud and landslides. The stormwater runoff will carry pollutants such as industrial chemicals from mechanized logging machinery and sediments from erosion directly into Lake Champlain, which millions of people per year rely on for drinking water and recreation.
- 2.) Less resiliency against the effects of climate change. Our largest mature forests provide the greatest resilience against climate change due to their ability to absorb and store the most atmospheric carbon. The rate of carbon accumulation increases continuously with tree size. In absolute terms, trees 100 cm in trunk diameter typically add from 10 kg to 200 kg of aboveground dry mass each year (depending on species), averaging 103 kg per year. This is nearly three times the rate for trees of the same species at 50 cm in diameter, and is the mass equivalent to adding an entirely new tree of 10-20 cm in diameter to the forest each year (Stephenson et al., 2014). Mature forests such as the one proposed for logging contain hundreds of millions of such trees, which would take decades if not centuries to regrow. These trees are needed right now.
- 3.) Due to the presence of invasive species, the forests which grow back after logging projects are not the same as they were before. Mechanized logging equipment destroys forest soil chemistry and biology, introduces invasive species, and paves the way for deer populations to eat away new growth. The succeeding forest is one which is far less robust, diverse and resilient against climate change.
- 4.) Significant impacts to wildlife and diversity. Due to the impacts of climate change more species than ever are at risk of becoming threatened, endangered or extinct altogether. Those species which rely on intact mature forests are most at risk due to the loss of these habitats to development and misguided logging projects.
- 5.) Irreparable damage to a forest which millions of visitors per year rely on for recreation such as hiking, camping, hunting, fishing, snowmobiling and more.

The Forest Service must make a commitment to re-evaluating their decision to log this outstanding, mature forest to preserve our climate future.