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Comments: As a resident of Vermont, I am STRONGLY AGAINST the proposed decision to log mature or old trees in the Telephone Gap.

Our Vermont state government has recognized the importance of, and need to preserve, our state's old forests. Our federal government is doing the same. Right now, both the state and federal governments are re-defining what old forest definitions are, with an eye towards climate change, wildfire prevention, protecting endangered habitats and achieving healthier forestlands.

Recently our state government passed Act 146. "Act 146 changes Vermont's Use Value Appraisal (UVA) Program by adding a subcategory to Managed Forestland called 'Reserve Forestland.'
(<https://fpr.vermont.gov/forest/uva-reserve-forestland>)

The final details of the Vermont UVA Reserve Forestland program won't be completed until July 2023. However, one of the reports that will be used to help create management requirements for this new category of UVA lands defines old forests this way: "Old forests are biologically mature forests, typically in late-successional stages of development, having escaped stand-replacing disturbance for more than 100 years..." - page 3, "2. Defining Old Forests" from "Considerations for a Reserve Forestland Subcategory in Vermont's Use Value Appraisal Program" (<https://legislature.vermont.gov/Documents/2022/WorkGroups/House%20Natural/Use%20Value%20in%20Vermont/W~Michael%20Snyder~Vermont%20Department%20of%20Forests,%20Parks,%20and%20Recreation%20Report%20-%20Considerations%20for%20a%20Reserve%20Forestland%20Subcategory%20in%20Vermont's%20Use%20Value%20Appraisal%20Program~1-19-2022.pdf>)

It's important to understand that Act 146 isn't just a statement by Vermont supporting and encouraging the preservation of old forest lands that are 100+ year old - it is actively funding it with taxpayer funds thru the UVA Program. Vermont taxpayers are subsidizing people's property taxes by encouraging them to maintain their own privately held old forestlands and protected habitats.

At the federal level, President Biden's Executive Order 14072, "Strengthening the Nation's Forests, Communities and Local Economies", has also led to the discussion of the development of a definition framework for old and mature forests on federally managed lands. A new definition of what old or mature forests are with this guidance will not be published until April 2023 by the USDA Forest Service - the very same organization planning the timber harvesting in the Telephone Gap area and asking for these comments. (Why are you asking for public comments on this plan, when your own agency has not yet determined what the new definitions of old or mature forests will be?)

The Telephone Gap proposal as of now details that a majority of planned timber harvests are going to be done on trees that are over 100 years old. By my calculations, over 55% of the 11805 acres (6523 acres) are of trees 100 years or older.

As a citizen of Vermont, I am glad my tax dollars are being used to encourage preservation of old forests on private lands. If the state's goal is to increase old forest lands to at least 9% of total Vermont forests, how does allowing logging of old and mature forests on public lands help us?

We should be preserving these old forestlands and setting aside and preserving more of the mature forestlands as well, not planning the harvest of timber from these environmentally critical areas.

