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Comments: The US Forest Service appears to suffer from institutional and scientific sclerosis.

Despite the dramatic crises we clearly face today - including climate change and biodiversity loss - and a growing global scientific consensus that forests play a critical role in sequestering carbon, are home to numerous rare and endangered species, and help us adapt to the heat, drought, and flooding associated with climate change, the USFS seems stuck in decades-old ideas about how forests work, and what the public wants from them.

The current intensity of logging in our forests means that the Northeast will indefinitely lack old forests and their complex composition and structure. Every patch cut and clear cut sets the forest back decades. High quality water, removal of pollutants, flood resilience, biodiversity, the crucial carbon storage that old trees and forests provide, and other benefits are being logged away.

Current levels of logging mean that the average maximum age of a forest is static, with trees harvested at a quarter of their natural lifespan, or less. Financial maturity is typically 50-75 years old while biological maturity is more than 200 years old. There is growing evidence that the intensity of management and harvesting in the Northeast is producing a simplified and homogenized forest and significant loss of biodiversity. Logging currently accounts for 86% of carbon losses from the region's forests and more than half of annual tree mortality, and it opens healthy forests up to invasive species, the second greatest threat to biodiversity in the United States after habitat loss and degradation.

The forest products sector is an important part of the Northeast economy. However, it is a small part. Revenues and employment are low compared to other sectors dependent upon forests and natural landscapes like tourism and recreation, and logging on public lands is often subsidized by taxpayers through below-cost timber sales, road building and forestry staff time.

How are low value wood products a priority for Vermont's and our nation's forests when this economic activity undermines the far more vibrant and lucrative tourism and recreation sector, which also employs far more individuals? How can we undermine the ecological services that older forests provide in order to subsidize a marginal industry in a time of unpredictable and catastrophic climate change? How can the USFS ask the public to subsidize this?

A study in eastern Canada showed that simplifying forest structure and composition through logging resulted in long-term habitat loss for forest-associated bird species, which in turn caused bird- population declines (Betts et al, 2022). As a recent editorial in a scientific journal put it: "...even well-executed forest restoration cannot fully regain the functions of old forests over time scales that will compensate for the biodiversity and climate ramifications of their loss." Carbon loss from soil and woody biomass has also been shown to be "substantial and persistent" for a decade after logging in some regions - it takes years for a logged forest to regain its role as a carbon sink.

In April 2022, President Biden issued Executive Order 1407229 to strengthen the nation's forests, communities, and local economies, "to conserve our mature and old-growth forests on federal lands and restore the health and vibrancy of our nation's forests." Previously, with Executive Order 14008, President Biden endorsed the global 30x30 movement, joining more than 100 countries<sup>30</sup> to protect 30% of the world's terrestrial and marine habitats by 2030. The work planned for Vermont's national forests appears to run directly counter to this Order.

What is going on in the US Forest Service? It is past time for the USFS to change tack and require employees to

catch up on and adapt to the current science, to weigh the true costs and benefits of forest management practices in a changing economy and world, and listen to the public, whom they should be serving.

1950s forest management was fine 70 years ago when we didn't know better and were not facing climate change and biodiversity collapse - but today it is a costly anachronism. The USFS should build more complexity, diversity and sophistication into the management of forests. This will include logging some areas, where appropriate, but leaving the majority of others - like the ecologically sensitive and unique Telephone Gap - to grow old in order to provide far more valuable carbon sequestration, clean water, wildlife habitat, biodiversity, and valuable tourism and recreation landscapes. These, too, are "working" landscapes and forests, but they are "working" to serve a broader range of objectives and constituents - in keeping with our times.