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Comments: Please reconsider your proposal to log trees older than 80 years in the Green Mountain National Forest. Many parts of the forest were cleared in the past two centuries and have been regrowing, resulting in even-aged and crowded stands. The solution to this is to thin the forest, remove diseased trees, and allow the majority of the trees to continue growing. Your plan does include thinning but, in many areas, more extensive cutting of old trees is proposed.

We know more now about the role of forests in sequestering carbon. The older trees store carbon faster than the younger ones. Forest ecology should also be given higher priority. Habitat for birds and animals requires old and downed trees with cavities and rotting wood with insects to populate the bottom of the food chain. It is not a bad thing for a tree to get older than the optimum age for timber harvesting. Consequently, I disagree with the statement in your proposed action that trees should be removed that "will exhibit increased signs of mortality or loss of merchantable value from disease or insects between now and the next time this landscape is likely to be considered for management."

I realize you are trying to comply with a forest management plan that was written years ago and foresees a mix of different aged timber stands, including acres of young forests that are valued for game habitat. I suggest that if you cannot override this plan, you postpone the Telephone Gap project until that forest plan can be rewritten, taking climate mitigation and forest ecology into account.