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First name: Thomas

Last name: Hudspeth

Organization:

Title:

Comments: I taught and conducted research in Environmental Studies and Natural Resources at UVM for 43 years. Since I retired in 2015, I have been communicating about climate science and potential solutions to the climate crisis through Climate Reality Project as well as Greater Burlington Sustainability Education Network <http://www.gbsen.org>, which I founded and for which I am a co-coordinator.

In those presentations and trainings, I point out that the IPCC climate scientists emphasize the necessity of drastically reducing and quickly eliminating the combustion of fossil fuels (coal, oil, natural gas) while concurrently taking advantage of nature-based (climate) solutions-NBS-to remove existing carbon dioxide, methane, and other greenhouse gases from the atmosphere. "Nature-based Solutions address societal challenges through the protection, sustainable management, and restoration of both natural and modified ecosystems, benefiting both biodiversity and human well-being. Nature-based Solutions are underpinned by benefits that flow from healthy ecosystems. They target major challenges like climate change, disaster risk reduction, food and water security, biodiversity loss and human health, and are critical to sustainable economic development" (IUCN).

One major means of NBS is planting trees, which sequester (remove and store) carbon in their plant tissues and in the soil. Much more significant is letting existing trees grow older. Forest ecologists' research findings demonstrate that older trees accumulate and store far more carbon than younger trees; in fact, the largest 1% of trees store some 30% of all aboveground forest carbon in the U.S.

The IPCC also reminds us that time is quickly running out for effective action to combat climate change and that forest protection globally represents more than one-half of the climate change mitigation needed to hold temperature rise to 1.5' Celsius. Further, the forests of New England-and especially Vermont-could store two to four times more carbon if we just let them grow old. Letting old trees continue to grow is among the most effective actions we could take.

Predominantly because of the reasons cited above, I vehemently oppose the logging of 11,800-acres of mostly mature and old forests as part of the proposed Green Mountain National Forest's Telephone Gap Integrated Resource Project. It calls for cutting healthy forests up to 160 years of age. It goes against President Biden's Executive Order on Earth Day, 2022, which specifically directed the U.S. Forest Service to protect mature and old-growth forests to counter climate change as well as loss of biodiversity. The proposed timber sale would release large amounts of carbon into the atmosphere, destroy mature and old-growth forest habitat for endangered species such as the Northern Long-eared Bat, and degrade the water quality of headwaters of both Otter Creek and the White River as well as Chittenden Reservoir, a water-supply area. It would also fragment and affect wildlife connectivity of the Pittenden Inventoried Roadless Area, an especially important wildlands area given the increased forest fragmentation that has occurred in Vermont over the past decade. Potentially, it might also introduce invasive species. Given the lack of existing roads and steep grade in much of the proposed timber sale site, I suspect that much of the logging would result in below-cost timber sales; I certainly do not want my tax dollars to go toward subsidizing such sales and reducing the tremendous NBS benefits of letting the trees stand and grow older.

In the late 1980s-early 1990s, I was contracted to work with then GMNF Supervisor Steve Harper and Planner Jim Northup on citizen participation/public involvement/stakeholder engagement aspects of the Forest's Land and Resource Management Plan. As part of those efforts, I produced tens of thousands of The Story Behind the Stump: Self-Guided Auto Tour of Green Mountain National Forest (distributed free of charge to Forest visitors, primarily from the Middlebury District office) and environmental education materials related to GMNF and its planning process for use in K-12 schools in Vermont. At that time, GMNF was regarded as a leader nationally for its planning and management efforts. I hope that the current management team can regain such high regard. Recognizing the existential nature of our current climate emergency and acknowledging the NBS benefits of letting trees on GMNF continue to mature and grow old-and stopping the cutting of mature trees projected in the Telephone Gap Integrated Resource Project-would go a long way toward doing so.

If I may be of assistance to you on this matter, please call on me.