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Comments:

Mature trees are at least 80 years old. Trees of this age and older store a lot of carbon. Most of the forests in the Telephone Gap area are over 100 years old. The largest 1% of trees store 30% of all above-ground forest carbon in the U.S. By letting trees grow, we store 2 to 4 times more carbon.

On Earth Day, 2022, President Biden issued an executive order directing the USFS to conserve mature and old growth forests to benefit the climate and biodiversity. On Dec. 29th, the USFS cancelled a timber sale in Oregon because it violated the intent of this order. Last week, President Biden reinstated the protections for Tongass National Forest, protecting the largest expanse of old growth forest in the U.S. from logging. Logging in Telephone Gap contradicts current best practices in land management.

The Integrated Resource Project Proposal's approach to climate change appears to be to harvest existing hardwoods on the approximately 12,000 acres in order to reorient the forest for a warming planet in the future. This turns logic on its head: even if deer predation and hay-scented fern infestation were controlled for the next 10 -15 years, the storage value of carbon in new growth would be a fraction of that in the existing trees. What is needed NOW are the maturing and older hardwoods to continue storing carbon during their life cycle to help us avoid the immediate warming crisis.

Telephone Gap is one of the few areas of our National Forest where a mature Northern Hardwood Forest exists without recent disturbance by "Early Successional Habitat Creation", clearcutting and shelter cuts, and other methods of manipulation to meet goals for wood output, populations of certain wildlife game species, and recreation. Now is the time and Telephone Gap is the place for the USDA Forest Service to dedicate a sizable portion of this management area of 32,745 acres to play a significant role in our national effort to forestall climate change. Please consider this alternative: make the 11,801 acres an ecological reserve for carbon storage and biodiversity conservation.

Please reconsider this plan and save these mature growth trees and reduce our carbon footprint at the same time.