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Comments: To whom it may concern:

On behalf of the members of PROTECT OUR WOODS, I wish to register our strong opposition to the Telephone Gap Integrated Resource Project #60192, especially the logging of nearly 12,000 acres of old trees, on top of other FS logging already in the works.

Forests are critically important for slowing climate change. They remove huge quantities of carbon dioxide from the atmosphere - 30% of all fossil fuel emissions annually - and store carbon in trees and soils. Old and mature forests are especially important: They handle droughts, storms and wildfires better than young trees, and they store more carbon.

The Biden administration is compiling an inventory of mature and old-growth forests on public lands that will support further conservation actions. But at the same time, federal agencies are initiating and implementing numerous logging projects in mature and old forests, including this proposal, without accounting for how these projects will affect climate change or forest species.

At the beginning of 2023, the White House Council on Environmental Quality directed federal agencies to consider the effects of climate change when they propose major federal actions that significantly affect the environment.

Most forests in the continental U.S. have been harvested multiple times. Today, fewer than 5% of these forests are more than 100 years old. Old, very large trees are the ones that hold the most carbon, and harvesting forests is the main driver of forest carbon loss.

In the Green Mountain National Forest in Vermont, federal officials have approved 40,000 acres of harvest since 2016, targeting many mature and old trees. One 14,270-acre area that was approved for harvest in 2019 contained more than 130 stands older than 100 years. This project required the construction of 25 miles of logging roads, which can have harmful effects, including fragmenting forests, polluting streams and making forests more vulnerable to human-caused wildfires.

Conserving forests is one of the lowest-cost options for managing carbon dioxide emissions, and it doesn't require expensive or complex energy-consuming technologies. PROTECT OUR WOODS believes that sufficient science exists to justify a moratorium on harvesting mature trees on federal lands so that these forests can keep performing their invaluable work.

The primary beneficiary of all the activities you are proposing in the Telephone Gap Integrated Resource Project #60192, especially the timber sales, is not The Forest (as that term is commonly understood), but the Forest Service itself, or at least its budget.

There is a concept called budget maximization that applies not just to the Forest Service or the USDA, but to all large bureaucracies, in which all other things being equal a bureaucracy will choose the option that is most likely to maintain or increase its budget. It also means that those within the agency whose values, training and professional expertise align with the interests of the agency in maintaining and expanding the budget tend to wind up in decision-making positions, and advance to higher levels of responsibility within the agency. And those priorities are also reflected in performance targets for individual national forests and performance reviews for line officers and other agency personnel.

Those whose choices and actions strengthen budgets get promoted and wind up in positions of responsibility because their choices feed the bureaucratic budget. There is a high correlation between those skill sets and policy priorities that happen to correspond with budget enhancement (especially logging, road-building, and more recently, fire) and those people who wind up advancing within the agency.

Sadly the Forest Service has come to conflate what is good for the Forest Service budget as being what is good for The Forest, especially with regard to the cutting and selling of trees.

The inability of the Forest Service to distinguish between what is good for the forest and what is good for the Forest Service is of particular concern because retention of receipts from the selling and removal of trees from the national forests has been part of the Forest Service's regular operations at the national level for years and sadly their budget now apparently depends on the continuation of that practice, since they have not yet found a replacement for the income generated from selling the biggest and healthiest trees. And the Forest Service has assiduously hidden this self-dealing from the public

When trees were cut for "timber" back in the 1980s there was an expectation that the sales would be profitable and that most if not all of the money received from selling the trees from the national forests would be returned to the treasury. With the discovery that the Forest Service was losing hundreds of millions of dollars on timber sales from the national forests (in part because so much of the revenue was winding up in Forest Service coffers), and with growing public outrage at the degradation of the public forests resulting from the logging, the timber sale program was scaled back; but the cutting and selling of trees continued under different guises and the rationales for the retention of receipts became more creative.

The Forest Service has continued to sell trees as "salvage," "sanitation," "stewardship," and most recently, "restoration." The beauty of the use of the term "restoration," from the Forest Service perspective is that most people support the idea of restoration, most people don't realize it is a euphemism for logging, and best of all, the Forest Service gets to keep all the money because there is no expectation that work conducted for forest restoration should make money.

It would be easier to understand what is at stake in the Telephone Gap Integrated Resource Project #60192 if the Forest Service would be more forthcoming about the financial incentives involved and what is to become of all the trees that are slated for removal and the revenues generated by selling them.

Please answer the following questions regarding funding and budgeting and performance reviews and targets:

With respect to annual Congressional appropriations, please provide information regarding the budget for the Green Mountain National Forest for the five most recent years for which you have data, specifically dollar amounts received and any targets or directives related to timber cutting, whether silvicultural or forestry goals and objectives, ecosystem management, natural resource management, restoration, or any other category that involves selling, cutting and/or removing trees, the sale of which generates revenues

Targets or directives included in Congressional appropriations

Targets or directives from the Washington Office of the NFS

Targets or directives from the Regional Office for the Eastern Region

Targets established by the Forest Plan for the GMNF

Monitoring reports related to any of the above regarding level of success in meeting targets set for the GMNF

submitted to the District Ranger

Monitoring reports related to any of the above regarding level of success in meeting targets set for the GMNF submitted to the GMNF Supervisor

Reports submitted by the GMNF Supervisor (or others) to the Regional or Washington Forest Service Offices regarding success (or failure) in meeting any targets established for the above

Information regarding performance reviews for District Rangers and/or the GMNF Supervisor with respect to targets or other performance goals related to the sale and removal of timber and the generation of revenue. And finally,

Is success in fulfilling such targets a component of performance reviews for District Rangers and/or the Forest Supervisor for the GMNF?

With respect to revenues from operations that the Forest Service is permitted to keep, for the same five years, please indicate into which, if any, of the following six funds your agency deposited funds generated by silvicultural treatments or any related activities (ecosystem management, natural resource management, restoration, or any other category that involves selling, cutting and/or removing trees, the sale of which generates revenues) on the Green Mountain National Forest, the dollar amounts deposited, the sources of those revenues, and the percentages of those revenues deposited:

Brush Disposal

Credits for Purchaser-Built Roads

Knutson-Vandenberg (K-V) Fund

Salvage Sale Fund

Stewardship Contracting Fund

Timber Sales Pipeline Restoration Fund

And recent reports suggest that fire has made up approximately half the entire Forest Service budget in recent years. Please include in your budget response the role of fire and how those funds are budgeted and allocated. Is it on acres proposed, acres completed, or some other basis?

People have lost all faith in the ability of the Forest Service to live up to its stated mission of caring for the land and serving people. What you care for and what you serve are one and the same and that is the well-being of what the Forest Service refers to as "The Forest," which is of course, in reality, the Forest Service itself and there is no better indicator of the well-being of the Forest Service than the well being of its budget. Except that it has sold its soul and betrayed its ethos.