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First name: Lynne

Last name: Man

Organization: Sierra Club, MA Chapter, Forest Protection Team

Title: Co-Leader, Forest Protection Team

Comments: The Forest Protection Team (FPT) of the MA Sierra Club thanks the USFS for the opportunity to comment on the Telephone Gap Integrated Resources Project. We appreciate the clear objectives and background materials provided for these comments.

Currently the Telephone Gap Integrated Resources Project plans to significantly reduce mature and old growth forests, including in roadless areas, and increase the proportion of young forests. The MA Sierra Club FPT strongly opposes this objective as well as most active forest management in the national forests within the Telephone Gap area.

Scientific evidence supports that, outside of a few limited circumstances, forests do not need "management" to be healthy and resilient. In fact, quite the opposite is true. Intact mature and older forests have greater biodiversity, sequester and store more carbon, are more resilient to weather events and disease, and are better at water filtration and air purification than forests that are managed to remain young. (Kellett, 2023; Law, 2022). Our goal should be to retain mature and old growth stands to the maximum extent possible. (Moomaw, 2019)

Like the Paris Climate Agreement, the Intergovernmental Panel on Climate Change (IPCC) and the current US Administration, we support conserving 30 - 50% of land, freshwater areas and oceans, including forest preservation and decreased forest degradation. The US Forest Service has a unique opportunity to move the nation towards achieving that goal. Approximately 92% of lands containing mature and old growth forests are within national forest lands. Yet only about 24% are currently permanently protected (Gap 1 and 2), with the rest available for logging. (Dellasala, 2022). Researchers estimate that if these areas continue to be logged, they will contribute approximately 9% of all US emissions. This is particularly important in roadless areas, which if left alone, increase their ability to act as natural climate solutions, allowing ongoing carbon sequestration and storage. When actively managed forests are compared to passively managed forests, or "wildlands," passively managed, intact forests retain 20% to 43% more above-ground carbon, and have greater structural complexity (Faison, 2023, Depro, 2008). Furthermore, maintaining older forests at a landscape scale will help sustain forests' ecosystem services and biodiversity in the face of climate change (Thom, 2019).

Additionally, no matter how logging is framed (i.e., for the health of the forest, resilience, pest control, etc.), it would not happen without a financial incentive. It has long been known that trees reach their financial optimum return long before their biological maturity (Jacobson, 2008). This provides incentives for forest managers to find ways to justify harvesting mature forests rather than letting such forests become old growth. We suggest that managing for timber production be done outside of public national lands. The USFS could transfer their knowledge and skills to provide assistance to private landowners wishing to use their forest lands in ways that are productive, sustainable and minimize harm to the environment.

In summary, we recommend that except for purposes of ensuring public safety and experimental research, 100% of the areas under the US Forest Service's purview in the Telephone Gap area be placed under permanent protection and preserved in perpetuity for the many benefits they hold for us, our children, wildlife and the planet.

Thank you for your consideration,

Lynne Man

Massachusetts Sierra Club, Forest Protection Team

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