

March 10, 2023

Christopher Mattrick
District Ranger, Rochester/Middlebury Ranger Districts
Green Mountain National Forest
99 Ranger Road
Rochester, VT 05767

RE: Scoping comments for Telephone Gap Integrated Resource Project

District Ranger Mattrick,

The undersigned organizations strongly urge you to rescind or reconsider the Green Mountain National Forest's (GMNF) Proposed Action for the Telephone Gap Integrated Resource Project.

The Telephone Gap project recklessly proposes 11,800-acres of logging in mostly mature and old forests that are among the most carbon-dense in the six-state New England region. The spectacular landscape centering on Telephone Gap is a keystone for wildlife habitat and connectivity, and a reservoir of carbon and clean water. These vast, intact forests harbor important headwaters for the Connecticut River and Lake Champlain, safeguarding communities from the impacts of droughts and floods. Brook trout, fisher, black bear, Bicknell's Thrush, and the Northern Long-eared Bat, which was recently added to the federal endangered species list, all call the Telephone Gap area home. Forty-five plant species that are rare or uncommon across Vermont have been documented in the Telephone Gap region; many of these are associated with the mature and old "rich northern hardwood forests" that are found within the project area.

If the US Forest Service's proposal moves forward, the Telephone Gap project would bring the total amount of land recently approved for logging in the Green Mountain National Forest to over 50,000-acres, an exponential increase over the past few decades.

Today, just 0.3% of New England forests are older than 150 years. And yet, of the 11,800-acres proposed for timber harvest in the Telephone Gap project, 92% (10,855-acres) falls within stands that are classified as mature or old in the 2006 GMNF Forest Plan, including nearly 500-acres between 150-160 years old. In addition, the proposal includes more than 2,500-acres of logging within the second largest Inventoried Roadless Area in the Green Mountain National Forest, a critical wildland that should instead be managed to maintain and enhance biodiversity and downstream water-quality.

The Telephone Gap Proposed Action runs afoul of President Biden's Executive Order 14072, which directs federal agencies to conserve mature and old-growth forests for the benefit of the climate and biodiversity. In fact, the Proposed Action doesn't even mention the Executive Order anywhere in the document.

In December 2022, the US Forest Service withdrew the Flat Country timber sale in Oregon's Willamette National Forest over concerns that it violated Executive Order 14072 by targeting mature forests of similar age to those in Telephone Gap. In another recent action, the Forest Service reinstated Roadless Area Conservation Rule protections for Inventoried Roadless Areas in Alaska's Tongass National Forest.

All of this begs a simple question: what makes the Telephone Gap project different?

Mature and old forests, no matter where they are found on public lands, are an insurance policy against a rapidly-changing climate and vanishing biodiversity. They accumulate and store vast quantities of climate-polluting carbon, and provide habitat for many of our most imperiled species. The mature and old forests of Telephone Gap are also prized as a spiritual refuge by countless residents of the Northeast US and visitors from around the world. Each year, over 200,000 people seek respite from their busy lives along Vermont's famous Long Trail, which bisects the project area.

The extensive tracts of mature and old forests in the Telephone Gap project area are a national treasure that cannot be replaced within the lifespan of any living American, and certainly not within a timeframe that is meaningful to the climate and extinction crises.

We urge you to rescind or dramatically reconsider the scope and scale of the Telephone Gap Integrated Resource Project.

Sincerely,

350 Eugene
350 Salem OR
350 Seattle
Californians for Western Wilderness
Center for Biological Diversity
Climate Writers
Conservation Northwest
Creation Justice Ministries
Earth Ethics, Inc.
Earth Neighborhood Productions
Earthjustice
Environment America
Environmental Protection Information Center-
EPIC
Forest Keeper
Forest Web
Friends of Big Ivy
Friends of the Clearater
Friends of the Pelham Hills

Gallatin Wildlife Association
Great Old Broads for Wilderness,
Cascade-Volcanoes Chapter
Green Cove Defense Committee
High Country Conservation Advocates
I Heart Pisgah
Indiana Forest Alliance
Inland Ocean Coalition
John Muir Project
Kentucky Heartwood
Kettle Range Conservation Group
Kitsap Environmental Coalition
KS Wild
Massachusetts Forest Watch
Mountain Valley Climate Action 350VT
Natural Resources Defense Council
New Mexico Wildlife Federation
Northwest Montana Great Old Broads for
Wilderness

Ohio Environmental Council
Old-Growth Forest Network
Oregon Wild
Owen-Putnam Friends of the Forest
Partnership for Policy Integrity
Progressive Democrats of America, Oregon
Chapter
RESTORE: The North Wood
Sage Mountain Botanical Sanctuary
Scientist Rebellion
Shawnee Forest Defenders
Sierra Club
Soda Mountain Wilderness Council
Southern Oregon Climate Action Now
Stop BTV Biomass
Sustainable Homes, LLC
Sustainable Rogue Valley

The Enviro Show
The Larch Company
The Ocean Project
Thurston Climate Action Team
Trees as a Public Good Network
TwoRivers ActionCoalition
Unitarian Universalists for a Just Economic
Community
United Plant Savers
Vermonters for a Clean Environment
Wendell State Forest Alliance
Wild Heritage, a project of Earth Island Institute
Williams Community Forest Project
Yaak Valley Forest Council