



March 11, 2023

BY ELECTRONIC MAIL

Chief Randy Moore
U.S. Forest Service
Sidney R. Yates Federal Building
201-14th St. SW
Washington, DC 20227

CC: R9 Regional Forester, Gina Owens; Green Mountain National Forest Supervisor, John Sinclair; GMNF Rochester/Middlebury District Ranger, Christopher Mattrick

RE: GMNF Telephone Gap Integrated Resource Project

Dear Chief Moore,

The undersigned organizations, representing The Climate Forests Campaign Coordinating Group, urge you to swiftly withdraw and reconsider the Telephone Gap Integrated Resource Project (TGIRP) on the Green Mountain National Forest (GMNF) while the Forest Service determines policies and regulations to meet the mandate of Executive Order 14072 regarding the inventory and conservation of the nation's mature and old-growth forests. This letter will also be submitted as a comment for the ongoing TGIRP scoping period so that it is part of the official record.

The Climate Forests Campaign is a coalition of more than 125 organizations calling for a durable, binding rule protecting mature and old-growth trees and stands from logging on federal lands (www.climate-forests.org).

On January 27th, the Green Mountain National Forest (GMNF) issued a Notice of Proposed Action and Opportunity to Comment for the TGIRP. Among other project components, the TGIRP proposes 10,855-acres of logging in stands classified as mature or old in the 2006 GMNF Forest Plan: “[t]here are approximately 8,760 acres proposed for harvest within the mature age

class (60-119 years old) and 2,095 acres within the old age class (120+ years old). Of the total old age class acres proposed for harvest, about 477 acres are between 150-160 years old.”¹

The TGIRP Proposed Action is inconsistent with the direction of President Biden’s Executive Order 14072 and the 2022 Forest Service Climate Adaptation Plan. Given the incongruity with the President’s Executive Order, it is appropriate for the Forest Service to withdraw and reevaluate the TGIRP as it did the Flat Country timber sale on the Willamette National Forest. Just as the Forest Service has started transitioning away from old-growth logging on the Tongass National Forest, it should set as a goal the re-establishment of old-growth forest on the Green Mountain National Forest. The TGIRP is also incompatible with the recent uplisting of the northern long-eared bat as federally endangered, a species whose habitat occurs throughout the TGIRP project area and will be harmed by logging.

The July 2021 TGIRP Landscape Assessment notes that “Old growth conditions are...rare on the [GMNF]...Timber harvesting since land abandonment in the early 20th century has perpetuated more frequent and larger-sized disturbances than would be typical under natural disturbance regimes (i.e. from insects, disease, wind, ice, floods, or beaver activity).”

President Biden’s Executive Order 14072 presents an opportunity for the Forest Service to shift management direction, through rulemaking, to conserve mature and old-growth forests and trees for the benefit of future generations, thereby reducing the rarity of these critical ecosystems.

Sincerely,

Center for Biological Diversity
Conservation Northwest
Earthjustice
Environment America
Natural Resources Defense Council
Oregon Wild
Sierra Club
Standing Trees
Wild Heritage, a project of Earth Island Institute
Wildearth Guardians

¹ “Telephone Gap Integrated Resource Project, Notice of Proposed Action and Opportunity to Comment, Detailed Version,” Green Mountain National Forest, Rochester and Middlebury Ranger Districts, January 2023.
<https://usfs-public.app.box.com/embed/s/fwyg8otexonu8on8sm4mxl4fz0o36ko9/file/1125013714612>