



March 13, 2023

VIA ELECTRONIC SUBMISSION

Christopher Mattrick
District Ranger, Rochester/Middlebury Ranger Districts
USDA Forest Service
99 Ranger Road
Rochester, VT 05767

Re: Telephone Gap Integrated Resource Project

Dear Mr. Mattrick:

The Partnership for Policy Integrity (“PFPI”) writes in opposition to the timber sale in the proposed Telephone Gap Integrated Resource Project (the “Project”). We oppose the proposed logging of nearly 12,000 acres of mostly mature forest in Vermont’s Green Mountains and urge you to withdraw the cutting plan.

PFPI is a US-based organization engaged in scientific and policy analysis and advocacy to promote policies that protect climate, ecosystems, and people. Since 2010, PFPI has been a leading organization working to counter exploitation of forests for fuel. The Telephone Gap Project is symptomatic of a mindset that undervalues the vital role of living older trees and aging forest communities for robust ecosystems and a sustainable climate.

This administration knows better. As President Biden’s [Executive Order on Strengthening the Nation’s Forests, Communities, and Local Economies](#) (the “Executive Order”) states:

Forests provide clean air and water, sustain the plant and animal life fundamental to combating the global climate and biodiversity crises, and hold special importance to Tribal Nations. We go to these special places to hike, camp, hunt, fish, and engage in recreation that revitalizes our souls and connects us to history and nature.¹

Nearly a year after the signing of this Executive Order, the Forest Service’s continued pursuit of this Project is infuriating. The plans involve logging forest communities up to 160 years old in

¹ “Executive Order on Strengthening the Nation’s Forests, Communities, and Local Economies,” April 22, 2022, Sec. 1, para. 1 (available at <https://www.whitehouse.gov/briefing-room/presidential-actions/2022/04/22/executive-order-on-strengthening-the-nations-forests-communities-and-local-economies/>).

Vermont's only national forest, with individual trees over 200 years old threatened by the Project. The 16,000-acre Pittenden Inventoried Roadless Area – one of the largest wildlands in Vermont – is targeted for 2,600 acres of logging. This needless Project will result in habitat fragmentation for the endangered Northern Long-eared Bat, degradation of cold-water fisheries, and exacerbated flood risks to downstream communities.

A recent analysis of current literature on forest carbon concludes that “creating wild spaces where unmanaged forests can age and develop ... should be the centerpiece of our carbon solutions.”² Our most mature forests are critical to natural carbon capture and sequestration, as well as watershed and habitat protection.

This part of the Green Mountains, like other forestlands throughout New England, has been on a trajectory of recovery after intensive land clearing for agriculture in the 1800s and early 1900s. While primary forests have been virtually eradicated in this part of the country, conscious policy decisions have allowed public lands such as the threatened Telephone Gap area to become mature forests once again. Reversing this restorative progress is tragically short-sighted. Unfortunately, over the last several years, logging in the Green Mountain National Forest has already accelerated, with 40,000 acres newly approved for logging, amounting to 10% of the entire national forest. The proposed Telephone Gap timber sale would continue the backwards policy mindset of recent years.

We applaud the Forest Service's December decision to withdraw the “Flat Country” timber sale project previously proposed in Oregon. It's not too late to correct course in Vermont. The Telephone Gap Project would undermine the stated objectives of the President's Executive Order, including first and foremost “[c]onserving old-growth and mature forests on Federal lands.”³

The Green Mountains, and other public lands, should be home to our future old-growth forests. Please withdraw the Telephone Gap timber sale logging plan, and allow this forest to grow old.

Respectfully submitted,



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² Mark G. Anderson, “Wild Carbon: A Synthesis of Recent Findings on Carbon Storage in Old Forests,” *International Journal of Wilderness*, Dec. 2021, Vol. 27, No. 3.

³ Executive Order, Sec. 1, para. 2.