



Vermonters for a Clean Environment

April 8, 2024

Chris Mattrick, District Ranger
USDA Forest Service
Green Mountain & Finger Lakes National Forests
4387 U.S. Route 4 East
Mendon, Vermont 05701
1-802-747-6700

VCE's Comments on Telephone Gap Integrated Resource Project Preliminary Environmental Assessment for 30-day Comment

Dear District Ranger Mattrick,

Vermonters for a Clean Environment offers these comments on the Preliminary Environmental Assessment for the Telephone Gap Integrated Resource Project (TGIRPEA).

Inadequate Public Process

The public has not been provided sufficient time to respond to the TGIRPEA. The TGIRP was anticipated for release in Nov. 2023, and was released on March 8, 2023. Upon review of the very large amount of material with changes to the draft issued in the prior year, VCE contacted Forest Planner & Environmental Coordinator Jay Strand on March 12 and asked for a 30 day extension of the comment period from April 8 to May 8. Mr. Strand responded on March 13,

Thank you for your request to extend the Telephone Gap project preliminary environmental assessment (EA) 30-day comment period. We do not plan to extend the comment period beyond the 30-day required by our administrative review regulations. The proposed action is slightly modified from the version distributed for a 45 day comment period in January 2023. The two additional action alternatives included in the EA are subsets of the same forested areas within the project area with a different focus. With this in mind, 30 days should be ample time for you to review the analysis documented in the EA and provide us meaningful comments.

On March 17, a new document, "Modifications and Alternatives Considered" was added to the documents for public review.

On March 27, a new folder with several new documents was added to the documents for public review.

On March 27, VCE attended the Virtual Public Meeting that was not in the original schedule but was added after inclement weather resulted in the public's ability to attend the March 20 in-person open house, which should have been rescheduled due to white-out conditions in the area.

At the March 27 virtual meeting, we asked for a two-week extension of the comment period. District Ranger Mattrick responded emphatically that there would be no extensions granted. However, at that same meeting, District Ranger Mattrick implored the public to read all the material and submit comments based on their own personal review, and not rely on others. The amount of material necessary to comply with District Ranger Mattrick's request is large, not only in volume but in substance.

It is not possible to offer substantive comments on the TGIRPEA in the limited time frame. We regret that we are not able to devote the time necessary to offer the type of comments requested by District Ranger Mattrick that we would have expected to provide given sufficient time. VCE objects to the truncated comment deadline, especially when new documents were added within the 30 day comment period.

The Telephone Gap Project Requires an Environmental Impact Statement

The information provided by the Green Mountain National Forest staff in webinars and documented in the TGIRPEA materials indicate that the Telephone Gap area is a Biodiversity Hot Spot.

The area is also identified as comprising a substantial amount of mature forest. The EA presents a perspective that having so much mature forest is a problem. The EA fails to respect President Biden's Executive Order that calls for "Conserving old-growth and mature forests on Federal lands."

Vermont is experiencing very wet conditions. Loggers are asking the Vermont legislature for millions of dollars to assist them in adapting to logging in wet conditions.

The EA is tone deaf to the changing weather circumstances that require minimizing logging to protect water quality, biodiversity and mature forests. Instead, the "Business as Usual" approach to these public lands is resulting in the type of EA that we would have expected in 2006 after the current Forest Plan was adopted. Eighteen years later, a different approach based on current science and policies to allow mature forests to grow older, reduce water quality impacts by reducing road building and logging is needed.

No new roads, whether temporary or permanent, should be allowed as part of management of the Telephone Gap area. Roads fragment habitat, increase invasive species, increase sedimentation and runoff, and are antithetical to the current needs of our public lands. All inventoried roadless areas should be kept roadless.

VCE recommends that the proposed activities in the Telephone Gap area raises such substantive issues that an Environmental Impact Statement is necessary. An EIS should include different Alternatives for the public to consider, including 1) no new roads in inventoried roadless areas, 2) no logging of mature forests, 3) reduction of timber harvest by half.

In the absence of an EIS, and with inadequate time for substantive public comment, VCE recommends the District Ranger choose Alternative A: No Action.

Vermonters for a Clean Environment incorporates by reference the comments by Standing Trees and Earthjustice.

Sincerely,

/s/ Annette Smith

Annette Smith

Executive Director

Vermonters for a Clean Environment