



January 17, 2025

VIA ELECTRONIC SUBMISSION

**To:** Christopher Mattrick  
District Ranger, Rochester/Middlebury Ranger Districts;  
John Sinclair, Reviewing Officer  
USDA Forest Service, Eastern Region

**Re: Protecting Green Mountain National Forest  
from the Destructive Telephone Gap Project**

We write to urge the Forest Service to withdraw the proposed Telephone Gap Integrated Resource Project (the “Project”).

The Partnership for Policy Integrity (“PFPI”) is a New England-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. PFPI strongly opposes the proposed timber sale that is the centerpiece of this Project, and once again urge the Forest Service to withdraw the Project.

While the Project proposal has been slightly modified since our last filing, the Forest Service still proposes to log over 10,000 acres of mostly mature forest in the Green Mountain National Forest. Trees that are at the heart of this ecosystem would be reduced to “an estimated 57,645 hundred cubic feet (CCF) of sawtimber, pulpwood, fuel wood or biomass.”<sup>1</sup> This Project would include the cutting of 817 acres of inventoried old growth in Green Mountain National Forest.<sup>2</sup> Our previously stated concerns – regarding loss of natural carbon capture and sequestration, as well as habitat fragmentation and degradation – remain. (See attached March 2023 comments.)

Additionally, the carbon emissions from this Project would be enormous – 254 thousand tons CO<sub>2</sub>e – and would be unjustifiable. The Forest Service states that the average annual emissions for the projected fifteen years of the Project are equivalent to burning almost 100 railcars of coal

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<sup>1</sup> Telephone Gap Integrated Resource Project – Final Environmental Assessment (“EA”), p. 18 (available at <https://www.fs.usda.gov/project/?project=60192&exp=overview>).

<sup>2</sup> Per Forest Service analysis in using Region 9 old growth working definitions, entitled “Alts C and D - Stands with EO14072 Characteristics,” in the supporting documents for the Project’s draft environmental assessment, ” available at <https://usfs-public.app.box.com/s/fwyg8otexonu8on8sm4mx14fz0o36ko9/folder/255738962142>.

each year, or nearly 40,000 barrels of oil each year.<sup>3</sup> The majority of these emissions would come from the logging and removal of living trees from the ecosystem, but over one third would be the result of prescribed fire that is proposed on 963 acres.<sup>4</sup> Prescribed burns, in addition to their immediate atmospheric carbon impacts, have an acute impact on wildlife and negatively impact air quality in surrounding communities.<sup>5</sup>

For the foregoing reasons, and the reasons set forth in our initial comments, we urge you to cancel this Project.

Respectfully submitted,



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<sup>3</sup> EA, p. 74, using numbers from Alternative C, the recommended alternative in the Forest Service's draft decision.

<sup>4</sup> The EA projects a total of approximately 95,812 t CO<sub>2</sub>eq from burning understory and deadwood (see EA at p. 72), rather than the slow release of carbon from decay over many decades, coupled with ecosystem recapture of CO<sub>2</sub>, that would naturally occur in a forest without the introduction of fire.

<sup>5</sup> See also G. Wuerthner, "The problems of prescribed fire," July 9, 2021, *The Hill* (available at <https://thehill.com/opinion/energy-environment/562167-the-problems-of-prescribed-fire/>) ("Under extreme fire weather conditions, fuel reductions (prescribed burning and thinning) are typically ineffective in slowing or stopping the spread of blazes").