

**Objections to the Telephone Gap Project:  
An Action Proposed by the USFS on the Green Mountain National Forest**

**Submitted by  
Jim Northup  
January 17, 2025**

**1. Introduction**

My name is Jim Northup and I live in Bristol, VT. I submitted comments on the proposed “Telephone Gap Integrated Resource Project” on March 12, 2023. I am writing now to object to the proposed actions outlined in the United States Forest Service (USFS) decision to implement Alternative C of the Telephone Gap Project.

The reasons for my objections are based on the comments I submitted earlier and, although those comments are not repeated here, I request that they be considered in their entirety as part of these objections.

Before summarizing the reasons for my objections, I wish to state that I appreciate very much the efforts the USFS made to respond to the requests made by me and others—principally reduction in logging of older forests, development of a climate-informed alternative that increases use of climate-smart forestry, and selection of that alternative. Although these are important steps that move the GMNF in a positive direction, they are not enough to adequately address the issues I raised earlier.

Until those issues are addressed fully by a climate-informed revision of the 2006 Green Mountain National Forest (GMNF) Land and Resource Management Plan (LRMP) and supporting Environmental Impact Statement (EIS) and a rigorous inventory of mature and old-growth forests, it will be impossible to fully evaluate the effects of implementing the Telephone Gap Project and other similar projects on the GMNF. Uncertainty will remain. The letter of the law will not be met.

Recognizing this uncertainty and legal shortcoming, the USFS should adopt explicit measures to better understand and mitigate the potential climate-related effects of Telephone Gap and like proposals and to engage its partners and the public in promoting climate-informed forestry on private and other public lands. If these measures are adopted in writing as required conditions of implementing Alternative C for Telephone Gap, it would be easier to not pursue the legal objections summarized below, especially if it is reasonable to expect that the findings learned from taking these measures would color the development of the new, climate-informed GMNF LRMP and EIS.

Conceptual descriptions of the recommended measures are offered at the end of these comments.

## **2. Reasons for objecting to the decision and proposed action**

I object to the decision and proposed action because:

- The out-of-date 2006 GMNF LRMP fails to provide the policies and guidance USFS staff need to ensure proposed vegetation management projects like Telephone Gap respond positively to the most urgent issue of our time— climate change—or to ensure potential harmful effects of the project on climate change are mitigated.
- The stated purpose of and need for the Telephone Gap Project fail to acknowledge and respond to the issues of climate change mitigation and adaptation, and conservation of mature and old-growth forests.
- The Telephone Gap Project fails to meet the letter or intent of Executive Order (EO) 14072 signed by President Biden on Earth Day 2022, calling for climate-smart management of federal forests, especially mature and old-growth forests.
- The GMNF has failed to “define, identify, and complete an inventory of old-growth and mature forests” on the GMNF, as required nationally by EO 14072 and to make the GMNF inventory public prior to implementing the Telephone Gap Project.
- The 2006 GMNF LRMP and EIS, and the Telephone Gap Environmental Assessment (EA) fail to adequately identify or assess the effects of proposed vegetation management on climate change mitigation and adaptation.
- The climate-related effects of logging almost 12,000 acres, as proposed by the Telephone Gap Project, and releasing several 100,000 tonnes of sequestered carbon would have a significant impact on the environment, triggering the National Environmental Policy Act’s (NEPA’s) requirement to prepare an EIS before project approval.
- A climate-smart alternative adequately addressing the issues of climate change mitigation and adaptation has not been adequately developed and studied in detail as part of the required NEPA process for the GMNF as a whole or for the Telephone Gap Project in particular.

### **Request**

In light of the reasons summarized above, I request that the Telephone Gap Project be postponed until: (1) the GMNF LRMP and corresponding EIS are revised to ensure the issue of climate change is adequately considered as required by NEPA and (2) the inventory of mature and old-growth forests is completed and fully considered as required by EO 14072.

Few legitimate reasons for not postponing implementation of the Telephone Gap project can be imagined. None were offered as part of the Telephone Gap EA.

One possible reason for moving forward with the project now is the importance of learning quickly: how to design and implement climate-smart forestry; how to

monitor, evaluate and improve its effects; how to show public and private forest landowners ways to put climate-smart forestry into practice as soon as possible; and how to develop meaningful climate-smart policies and practices for inclusion in the revised GMNF LRMP and EIS.

The ecological health of the planet hangs in the balance.

I request that the USFS work closely with climate and forest scientists, public and private partners, private forest landowners, and others to develop explicit standards, practices and actions for implementing climate-smart Alternative C; monitoring, evaluating and reporting on the effects of that implementation; demonstrating on-site the implementation of climate-smart forestry to the public, especially private forest landowners; and engaging all interested parties in a meaningful, on-going conversation about what is learned and how to do it better.

Thank you for considering these comments. Please contact me if you have any questions or wish additional information.