­January 17, 2025

USDA – Forest Service, Rochester Ranger District c/o Christopher Mattrick 99 Ranger Road

Rochester, VT 05767

Christopher Mattrick – District Ranger,

I am writing to express my continuous strong opposition and to the proposed Telephone Gap Integrated Resource project. It should be noted that I provided scoping comments with my initial letter dated March 13, 2023 and another comment letter on April 7, 2024. My concern and objections continue to be focused on Timber Management and Recreation.

**Timber Management**

Even though the Forest Service made some changes to the initially proposed plan by selecting Alternative C, these adjustments fail to address public concerns. The areas slated for logging under the TGIRP include concentrations of mature and late-successional trees aged 80 to 160 years. These old trees are rare and invaluable!

As a resident of Goshen—located within a portion of the proposed project area—I set out last spring on a mission to explore and witness firsthand what is at stake in Goshen Township. My goal was to reach a section of the forest with trees dating back to 1899 (Compartment 110, Stand 20).

For about an hour, I wandered through the forest, which looked very similar to the woods around my Goshen house that used to be a sheep farm sixty years ago, consulting the TGIRP harvest map and my phone. After crossing a few swampy areas and climbing a ridge, I found myself in a very different forest. Suddenly, I didn’t need navigation anymore—I knew I had arrived.

Standing in this remote old forest, I was filled with a profound sense of calm and peace, as if touched by a divine presence. Unfortunately, I quickly noticed the trees marked with blue spray paint—a mark of their impending destruction. In the midst of a mental health crisis, it is unacceptable to destroy these oases of peace, beauty, and healing. Our children and grandchildren will thank you for preserving these forests for future generations to enjoy.

In addition to my previously submitted comments, I am providing the following objections based on new information that has become available since the preliminary environmental assessment comment period began on March 8, 2024.

1. The Telephone Gap area is home to extremely rare species, including the Canada Lynx. A security camera captured a lynx walking through the parking lot of the GMNF Supervisor’s Office in Mendon, VT on September 3rd. And yet, despite proof of the presence of Lynx in the Telephone Gap project area, the Forest Service stated in the Telephone Gap Biological Evaluation that “the gray wolf and Canada lynx are not known to occur within the project area on the GMNF, [and] they are not likely to occur within the project area in the foreseeable future.” This is false. The Forest Service must reassess and analyze the potential impacts on lynx.
2. The Telephone Gap logging project would cut 817 stand acres of old growth, a

significant figure considering that the US Forest Service estimated in June that there are

only 2,000-acres of old-growth in the 400,000-acre Green Mountain National Forest. In

other words, only 0.5% of the entire forest is old growth, and the Telephone Gap project

threatens to cut almost half of this extraordinarily important and rare habitat. Research indicates that New England’s forests could store two to four times more carbon if allowed to grow old. Preserving these mature trees is one of the most impactful actions Vermonters can take to fight climate change.

1. The Telephone Gap project would release 254,556 tons of CO2e—equivalent to driving more than 60,000 average passenger vehicles for an entire year! Tax dollars should not be used to subsidize tree cutting, which directly contributes to increased CO2 levels.

**Recreation**

The Forest Service didn’t make any changes to the recreation part of the proposal after receiving the public comments. The FS continues to use a piecemeal approach to development of recreational opportunities without assessing a cumulative impact of the proposed actions on wildlife, vegetation, soil and visitors’ experience. The bigger picture is that the GMNF Forest Plan does not address the build-out of huts and extensive mountain bike networks.

 It appears there are no master plans for either the VHA or the Velomont Trail. In a public field trip last fall, District Ranger Chris Mattrick stated that a Master Plan is needed for all of these hut proposals and that was going to be undertaken by VHA. The fact that the South Pond hut was tossed into the NEPA analysis for Telephone Gap is solely based on the convenience of its geographic location being within that analysis area. This stand-alone hut analysis is very disingenuous, as it clearly avoids the required cumulative effects analysis required by NEPA that would occur under a comprehensive Master Plan. Construction of a hut that is to become part of a system or network of huts throughout the forest requires analysis of that entire system. Conducting a piece meal analysis fails to discuss and disclose the cumulative effects that such a hut system may enact. Forest recreation managers should be well aware that introduction of new facilities would have multiple effects (at a minimum) on existing wildlife, changes in visitor use patterns and seasons of use, and maintenance/enforcement requirements that will be an added burden to budgets.

None of this can be effectively analyzed without a comprehensive view of the total system or network that is being ultimately envisioned. NEPA requires cumulative effects analysis on an entire systematic proposal just to address those concerns. Without an actual plan moving forward with the proposed activities in the TGIRP is premature.

In conclusion, the proposed TGIRP alternative C doesn’t align with the FS’s mission: “Caring for the Land and Serving People” therefore TGIRP should not be implemented. The FS should make the only right decision-cancel the destructive Telephone Gap logging project.

Thank you for the opportunity to submit an objection to the proposed Telephone Gap Integrated Resource Project in the Green Mountain National Forest.

Respectfully,

Galina Chernaya