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16 January 2025

Christopher Mattrick, District Ranger
Rochester and Middlebury Ranger Districts
Green Mountain National Forest
In re: Telephone Gap Integrated Resource Project

Dear District Ranger Mattrick:

I am writing to object to your Draft Notice of Decision and Finding of No Significant Impact for the Telephone Gap Integrated Resource Project, dated 4 December 2024.

I request that it be noted that my objection here renews the arguments against the Project I offered to the District on 7 April 2024.

The District's responses to my earlier objections are based on claims and standards that I -and most of the objectors to the Project-have argued are out of date, at odds with the emerging science and inconsistent with the urgency of the present and worsening combined biodiversity and climate crisis. In responding to my earlier arguments and the similar arguments against the Project by other opponents, the District has referred primarily and nearly exclusively to the very claims and standards that I and others have argued are outdated, at odds with the best available science and inadequate to the ecological emergency we are facing.

I have argued that cutting on 11,000 acres of Telephone Gap, 91% of which is classified as either mature or old forest, will result in an enormous loss of carbon sequestration --an overwhelming diminishment of our most important natural climate protection resource--and a loss that will not be repaired at least for decades or more likely for a century or more. The District's rejection of this argument does not deal with factual particulars to refute this claim but relies only on the application of abstract legal standards which themselves are not based on the most relevant factual particulars and science. The same is true, all the more so, with respect to the more than 800 acres of designated old forest within the Telephone Gap IRP. The claim we've made is that this is not only a significant ecological impact, it is a disastrous impact and one not to be repaired for generations. At base the dispute here is about the standards that must be applied in the present emergency situation. The dispute cannot be resolved by reference only to the very standards that fail to adequately take into consideration the components of the emergency itself.

My earlier objections also referred to the importance of allowing old forests to persist and allowing mature forest to grow old for the sake of preserving water purity, limiting flooding and soil erosion and maintaining the richest possible biodiversity, including habitat suitable for seriously endangered species, such as Northern Long Eared Bat, Brook Trout and Canada Lynx. The standards the District has applied in responding to these claims against the Telephone Gap IRP, date from a time before Vermont yearly experienced record flooding and the present accelerated pace of species endangerment and loss. Again, the debate about what's best for our public forests and for Telephone Gap in particular cannot be resolved if the terms of debate and the choice of the most relevant and telling standards are themselves out of date and inadequate to present and future conditions.

There are other parts of the Draft Final Decision that are simply absurd and inadequate on their face. For example, the claim that logging fully 1,800 acres --more than 10%--of the 16,000-acre Pittenden Roadless Area will not substantially alter the "character" of one of the State's largest unprotected wilderness areas is so vague and unspecific that it is simply not credible. In fact, it's not even a meaningful or serious claim. Speaking of designated Roadless Areas, it is worth remembering that Jim Furnish, once Deputy Chief of the National Forest Service and principal leader in creating its Roadless Area Conservation Rule, wrote in 2015 that "In the space of less than twenty years, national forests have gone from not even being discussed as valuable carbon stores to having a potentially significant role as a shock absorber for climate change." (Toward a Natural Forest, p. 196) Many of us are more than worried that the TGPIRP Final Notice of Decision is indication that this important lesson is being forgotten right now when it's needed more than ever before.

Similarly negligent is the failure of the District to consider seriously the fact that the Project will result in the release of some 255,000 metric tons of CO₂e. And this figure does not even factor in the carbon emissions caused by equipment and fuel use over the term of the Project. Nowhere does the Draft Notice of Decision measure this consequential impact of the project against the truly trivial impact on opportunity for logging offered by the Project -somewhat less than 4% of all logging in Vermont.

We all understand the enormous pressures, both political and economic, exerted against the Forest Service and the District as they seek to meet their obligations in reaching sound ecological decisions about forest policy and management in a time of ecological crisis. Those pressures will no doubt increase during the next few years. For exactly this reason, it is important right now and perhaps more than ever to also recall Jim Furnish's call to conscience and action:

"The finest tradition of American excellence calls for us to initiate change when conditions warrant and then to take bold action. The world waits for leaders to step out, without apology, to create a different future: create hope again, and again, and again. . . Do it now. (Toward a Natural Forest, p.200)"

There's still some slight time for GMNF leaders to follow this good advice.

Respectfully submitted,

Geoffrey Gardner