

Comments on the Telephone Gap Integrated Resource Project

Basis for the Project

The Telephone Gap IRP is presented as a strategy by the Forest Service to achieve the goals, objectives, and desired future conditions provided by the 2006 GMNF Land and Resource Management Plan.

Comment:

The plan is nearly two decades old, and written prior to the overwhelming scientific consensus that global climate change is an existential threat. Further, the plan does not even mention climate change, and thus does not consider the impact of the plan on climate change. The plan is obsolete, and should not be the basis for any proposal in the Telephone Gap region. A new plan is needed that addresses climate change, period.

'Resource Section' Forest Habitat & Timber

This section identifies concerns with habitat diversity.

Comment:

The stated concerns do not follow the Biden Administration's Executive Order to conserve mature and old forests on federal lands, and, the US Forest Service's Climate Adaptation Plan that recognizes that old and mature forests habitats are 'ideal candidates' for increased conservation efforts. As such, the stated concerns with habitat diversity are misguided and lack credibility.

'Resource Section' Recreation & Visual Quality

This section states that there are limited opportunities for specific trail uses, and that maintaining existing trails and facilities to desired standards could lead to increases in health and safety risks and potential damage to resources such as soil, water, and fisheries.

Comment:

These limited opportunities and challenges can, and should, be addressed without logging ~10,000 acres of mature and old forests.

'Resource Section' Soils, Wetlands & Transportation

This section mentions (1) unclassified roads are a source of erosion and sedimentation and alter the natural hydrologic regime by facilitating increased water runoff; (2) a small dam removal; (3) replacing culverts; (4) road realignment; and (5) adding new road sections and a parking area. This section does not mention

Comment:

All of the proposed activities in this section can, and should, be addressed without logging ~10,000 acres of mature and old forests. Further, this section does not, but should, address how

the proposal may threaten important headwaters, water supply areas, and flooding downstream communities.