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Comments: Quoting from the "Notice of Proposed Action," the Telephone Gap project "includes a variety of proposed management activities to achieve multiple resource goals, objectives, and desired future conditions as provided by direction in the 2006 GMNF Land and Resource Management Plan, or Forest Plan." I therefore went to the cited plan expecting to find details and evidence-based arguments for why the proposed actions best serve the public welfare. What I found instead is a long series of ex cathedra pronouncements without any serious argument to justify them with scientific evidence. After repeatedly referring back to USFS documents, I can only conclude that the only actual justification of the proposed actions is that "We said so!" Nonetheless, these pronouncements are now trotted out as gospel justifying multiple statements of the form "There is a need to ..." for some 17 different interventions by my count. Allow me to suggest some of my own:

1. There is a need for a thorough and ongoing biological inventory of what actually lives in the GMNF before any major interventions to improve on nature are undertaken.
2. There is a need to fully account for the carbon emissions caused by the proposed interventions, both immediately and over decades to come, arising from both the use of fossil fuels and the disruptions of a thriving forest ecosystem that is just hitting its stride in terms of packing on carbon storage.
3. There is a need to show in detail how any intervention involving mature or old growth forests, which make up the vast bulk of those targeted by the Telephone Gap project, serves to fulfill the requirements of President Biden's Executive Order 14072, including Immanent action to "develop policies, with robust opportunity for public comment, to institutionalize climate-smart management and conservation strategies that address threats to mature and old-growth forests on Federal lands."
4. There is a need to explain how the construction of even a "temporary road" to bring in motorized heavy equipment for tree removal in a designated Roadless Area comports with the goals of the Roadless Rule, especially in view of ongoing efforts in Congress to strengthen this rule.
5. There is a need for the Forest Service to seriously engage with a growing body of peer-reviewed scientific research that raises serious objections to traditional forestry practices, such as those proposed for the Telephone Gap project.
6. There is a need for the USFS to break out of its self-perpetuating information bubble and actively participate in the global conversation regarding how we can maximize the overall benefits forests provide in the face of the deadly and worsening threats of climate disruption and mass extinction.

The people of the United States deserve far better than this. We have a right to an evidence-based, open, transparent, and inclusive process for reaching critically important decisions regarding the care of our National Forests, which, after all, belong to us.

Sincerely,

J. William Stubblefield