

Data Submitted (UTC 11): 3/13/2023 2:24:19 PM

First name: Michael

Last name: Bald

Organization:

Title:

Comments: Thank you for the opportunity to comment.

The Telephone Gap IRP has brought to light, emphatically, the clear need for a Forest Plan revision. The project proposal references the 2006 Forest Plan (outdated) on a regular basis as well as other documents that are well beyond their relevance. It's time, there's just no escaping that.

I can point to the Forest Plan itself for validation, pages 3 and 6. "If monitoring and evaluation indicate that immediate changes are needed..."

Unfortunately, I did a good deal of searching and could not find any Monitoring & Evaluation Reports from the past ten years. I did find that a handful of such reports were scheduled for release in DEC 2022 and early 2023. OK, let's have a look. Are those reports now available?

I also found that the whole process of Monitoring & Evaluation was revised / altered / re-structured somehow between 2012 and 2016, but then everything just goes blank. The question is kind of obvious here. If a big flood event happens, TS Irene, and then we all of a sudden stop monitoring those indicators we've been tracking for a long, long time, how do we know what's presently going on? Where's the continuity, and how does the public access reports if any reports are still happening? I did not ask for help with this question, because I wanted to see if I could track down the information. I could not, and I think that's a problem.

Page 6 of the 2006 Forest Plan (outdated) addresses the need to amend management direction. Of course, at some point, amending an entire outdated forest plan should be scrapped in favor of simply starting over and calling it all a revision. Again, it's time, as these quotes illustrate:

"The need to amend management direction may result from:

Changes in physical, biological, social or economic conditions

Errors in planning found during implementation

There are other points justifying an amendment, but the above are those external to the agency. They carry a degree of independence.

I submit that so much has changed since 2006 that Forest Plan Revision should already be underway. The climate is different, the pace of change has quickened, the socio-economic divide has worsened, drought is a regular occurrence, and pesticide usage is now a real, but ignored, environmental constant. These changes, on top of many others, absolutely justify a Stop Action on the outdated 2006 Forest Plan.