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Comments: I am writing to express my belief that the Telephone Gap Project should not proceed until such time as all necessary analysis of its impacts have been fully evaluated. I believe that there are a number of areas where the proposed project has not received this evaluation.

The first area of my concern lies with the fact that the proposed action is based on the GMNF 2006 Forest Plan, a document that was written nearly 20 years ago, and that is very much not current in regards to the impact that harvesting trees has on climate change. On page 3 of that document it states "...NFMA regulations require that Forest Plans be revised every 10 to 15 years (36 CFR 219.10). There is no talk of sequestering carbon, and just brief mention of climate change.

The Environmental Impact Statement that the Plan is based on, which is equally out of date, inexplicably also fails to address these matters. It is not, as it claims, based on "best scientific information".

While the Proposed Action - Detailed Version does address these matters somewhat, the level to which it does is woefully inadequate. The reports that are cited clearly state that given the large number of variables in the matter, and the lack of historical data, there is no way of knowing in great certainty what is going to happen to the forests due to climate change. And what impact harvesting trees will have.

I would like to mention that I have spent my whole career working with wood, and am not opposed to the harvesting of appropriate trees to supply our lumber needs. What I am opposed to is the needless harvest of healthy high elevation, and / or deep forest trees. Given the higher environmental costs of removing these, they should be taken only as a last resort.

It is my understanding that there is not an industry wide shortage of logs available for the sawmills, and therefore there is not a demonstrated economic need for this proposed harvest. It is also my understanding that a significant portion of the material harvested will not only leave the state, but also leave the country, heading to Canada and China. This further reduces any possible economic benefits the harvest may have for the local economy.

Given the existential threat that climate change represents, and the impact on millions of pounds of carbon by this harvest, it should not proceed unless there is an extremely high level of confidence that it will not add to our problems. This conclusion can only be reached after thoroughly evaluating its impacts - something which has not yet happened.