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Comments: I'm writing to express substantial reservations about this Project. Most of my reservations can be expressed in my response to a particular passage of the Notice of Proposed Action, on Page 7: "While some of the composition and age class objectives may be met through natural processes, vegetation management such as commercial timber harvest, prescribed fire, and other treatments are often used to restore and enhance diversity of habitat types and structure (Forest Plan, Goal 10, p. 15). Vegetation management is also used to enhance habitats and features of particular value to certain plant and animal species where habitat is uncommon in the forest, such as aspen, birch, and oak. Within the Telephone Gap project area, vegetation management actions would occur within the Diverse Forest Use, Diverse Backcountry, and Remote Wildlife Habitat Management Areas where timber harvesting and other vegetation management treatments are allowed (Forest Plan, p. 11)."

There is an implicit understanding here that there is not strictly speaking any overwhelming need to achieve through commercial timber harvest many of the stated forest management goals of the Forest Plan broadly or this Project specifically. Commercial timber harvests "are often used", but need not necessarily be used. "[T]imber harvesting and other vegetation management treatments are allowed", but not mandated. But a 17-year-old Forest Plan and centuries of extractive forestry traditions seem to dictate that a heavy hand must be laid on the land to bend it to what we currently believe to be the best "desired future conditions": a standard that itself has shifted over time, and perhaps never so quickly as in the last few decades.

Particularly as regards climate adaptation and mitigation, the Notice of Proposed Action evinces a startling (although quite common in the forestry profession) certitude about the "complementarity" of commercial harvest operations and the dire need to retain carbon on and under the ground and sequester it from the atmosphere. I have seen the language in scientific literature over the last couple decades shift and adapt to new knowledge and perspectives. In particular, above-ground pools of carbon were at one point given pride of place in the conversation. Now, there is more attention given to below-ground pools of carbon, but still a tendency to underplay the short- and long-term impacts of heavily mechanized harvest operations on those underground pools of carbon. As in every other scientific realm, our understanding of the role above- and below-ground forested ecosystems in the carbon cycle and climate change more broadly is ever-evolving. The current, tenuous consensus is unlikely to remain durable for couple years of this process, let alone the many decades over which the effects of this Project will be felt on the land.

On page 37 I read, "Some types of vegetation management do not inherently conflict with old forest designations since they are intended to promote structural complexity of stands and actively manage areas toward enhancing old forest characteristics." But our current quantitative methods that tend to support such an assertion cannot capture the fact that a skidder is qualitatively different from an ice storm. A harvester is qualitatively different from a hurricane. A forwarder is qualitatively different from a flock of *Ectopistes migratorius*. It would behoove us to move more cautiously.