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Comments: Telephone Gap Comments

I appreciate all the hard work and detailed analysis that has gone into the project and the good faith effort to come up with less intrusive modifications (Alternates C and D). However, it still seems that much of the project is not justified. I believe it would be preferable for the Forest Service to focus on restoring forests where they have been eliminated and on controlling invasives.

My specific comments follow.

1) At this time, with climate change being a critical concern, any actions which will result in increase the greenhouse gas content of the atmosphere must show very substantial benefits to be justified. The proposed Telegraph Gap project does not meet this criterion. Almost all the cutting proposed will reduce the rate at which carbon is sequestered in the forest. Cutting maturing trees to be replaced by meadows or early succession forests; cutting trees whose wood will be used as fuel; logging and skidding disturbing soils; controlled burning; will all result in enhanced greenhouse gas emissions and/or reduced sequestration rates.

2) The benefits of the project are minimal. The direct economic benefits are non-existent. The "harvesting" will definitely have some and perhaps large effects on the enjoyment of traveling in the forest and observing the forest from roads, homes, and resorts.

3) It is not clear that the proposed action will really improve the quality of the forest beyond what will naturally occur . At one point the project calls for clearing large acreage and controlled burns to promote oak tree growth while elsewhere the project talks of replacing hardwoods with softwoods.

4) Creating openings in the forest to improve habitat for species not originally native to the area or for game animals releases carbon, reduces carbon capture and creates great opportunities for invasives. Maintaining the openings will probably require repeated use of herbicides. It is generally recognized that severe weather events will increase in frequency and severity. This implies increases in number and scale of blowdowns. This should obviate any need to create artificial openings or early succession forest.

5) A 25 foot wide cutting exclusion zone for streams and wet lands is inadequate considering the size and power of logging machinery and the size and height of the trees to be cut.

6) The project's logging will result in loss of recognized forest benefits such as direct cooling; contributions to local rain cycles; erosion prevention.