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Comments: Please reconsider the goals and implementation of the Telephone Gap project to better address this country's needs for climate mitigation and protection of biodiversity that is dependent on older forests. Furthermore, alternatives must evaluate management at a landscape scale that considers all activities within the project area.

Climate impacts:

The Environmental Assessment inadequately evaluates the carbon cost of the alternatives because it does not conduct a complete carbon budget that considers the relevant factors: above and below carbon storage; carbon released from the trees during and immediately after logging; the quantity and durability of forest products that are created from the harvested trees; and the carbon emissions of the harvest and transportation equipment used for harvest and processing of the trees into usable products. Without a more complete carbon budget that quantitatively considers these factors there is no way to evaluate the climate impact of the proposed alternatives.

Biodiversity:

The Environmental Assessment does not adequately consider how the alternatives may impact forest beings that depend on the environmental stability and complex food/energy webs of mature and old growth forest. Older forests provide a stable environment where fluctuations of moisture and temperature are muted. Many forest dependent species of plants, animals, fungi, and insects require that stabilized environment to thrive. Older forests are relatively rare in the north-east and a fuller evaluation of the impacts of shifting the forest to a younger age structure must be conducted.

Landscape scale management:

The Environmental Assessment does not adequately consider the character and management of private lands within the project boundary. While the Forest Service only has control over management of federal property it must consider that management within the broader context of land management on all lands within the project boundary. Only through a good landscape scale management approach can the Forest Service design alternatives that protect and enhance the plants and other beings in the national forest.

Given the shortfalls in the current EA, a more complete Environmental Impact Statement should be conducted. If a decision is made based on this less than adequate EA, Alternative A, No Action, should be chosen.