To whom it may concern,

Thank you for the opportunity to comment on the Integrated – Junction-Falls Integrated Resource Management (J-FIRM) Project. I have several general comments regarding the scoping documents and continual planning of this project.

I have outlined my comments to mirror your scoping documents where I first comment on the stated needs for the proposal, then I discuss comments pertinent to specific geographic areas and the proposed actions.

1. Needs for the Proposal.
    a. The Falls Creek Archaeological Area portion of the forest plan highlights numerous desired conditions relating to archeological and cultural values of the site (see 3.16.1, 3.16.2, 3.16.5 of the forest plan). It would be great if tribal consultation could be elevated to also include opportunities for tribal management of the resources on these lands. Numerous studies have demonstrated ceremonial and cultural use of forested landscapes in the SW and empowering tribes could be an opportunity to enhance modern connection to land while also achieving desired conditions (Roos, 2020; Roos et al., 2021).

    b. Communities and RMRI
        i. It is a misnomer to suggest that management of fuels in wildlands can provide wildfire protection to adjacent communities in urban areas or the wildland-urban interface (Syphard et al., 2011). It should instead be perceived that wildland development in fire prone ecosystems comes with inherited risk of wildland fire and targeted treatments can help improve the decision space during incidents but does not guarantee wildfire protection or home defense (Kramer et al., 2021; Radeloff et al., 2018). While the forest service is the management entity for public lands and forests, thinking outside the box on adapting to fire can include investing money to community ingress, egress, home hardening, and public education.
        ii. Personal and small-scale forest product use can be complimented with cultural use of wood products and can be enhanced to a community forest model where community prescriptions for wood products are managed. My hope is the opportunity for collective decision making in managing forests directly adjacent to communities to help restore our relationships with forests.
        iii. Being sensitive and responsive to tribes can be modified to being proactive to empower cultural engagement with natural resources on ancestral tribal land

    c. Clean Water

i. More discussion on the definition of beneficial use could provide better hydrologic context to the 'needs' of this project
ii. Reducing recreation impacts and sedimentation to wetlands, riparian areas and groundwater dependent ecosystems seems reasonable, however, making sure that thinning and other activities do not also increase sedimentation is equally important. Additionally, bever-mimicry and other tools to capture sediment, in the event of a wildfire, can improve water retention and quality pre-and post fire while also helping to create areas of forest that are resistant to fire and can be additional tools in the proposed action list (Fairfax & Whittle, 2020)

d. Forests and Wildlife
    i. Additional research on forest resiliency to insects and disease in the face of climate change could be considered, especially in mixed conifer forests (Remke et al. , 2021).
e. Recreation
    i. The recreation needs can be incorporated in additional resource management objectives. Can trails be utilized as burn units?
f. Junction Creek
    i. Prescribed fire - I appreciate seeing the use of the fuel break created during the 416 Fire as opportunities for prescribed fire. I think expanding the language here to open to managed fire for resource benefit could be beneficial as fire is a tool to help achieve more resilient forests and is likely to occur more frequently during times of drought (Baker, 2022; Stephens et al., 2018).
    ii. Vegetation Thinning –
        1. Group selection and improvement cutting may help in diversifying forest structure, however, given the management history of previous logging I hope large tree retention is prioritized as large and old trees provide important ecological function including providing bird habitat and are the most fire-resistant trees in the forest and are often rare in areas preciously logged (Brown et al., 2019; Fernández-Tschieder et al., 2020; Lydersen et al., 2013).
        2. Condition based management is an excellent approach, especially in the adaptive management framework where collaborative stakeholders have opportunity to engage with management actions in different conditions. Other EAs have used sanitation style approaches when beetles are present and I encourage more progressive thinking that allows for opportunities to view natural processes, including beetles and disease, as opportunities to passively achieve desired conditions since drought resistance and beetle resistance are traits that can be difficult to select for in management activities (Six et al., 2018; Steel et al., 2021). Since. Mitigating disturbance can be difficult given climate change, thus

seeking opportunities to accept change or direct change can be useful. (Schuurman et al., 2020).

3. The 700 acres designated as hand thinning with helicopter removal should be closely evaluated for economic impacts. The Roadless areas adjacent to communities feels like opportunities to promote living with wildfire and achieve desired conditions through planned on unplanned managed fire that burns at mixed severity (DellaSala et al., 2015; Higuera et al., 2019; Malone et al., 2018; McWethy et al., 2019).

iii. Permitted Winter Grooming

1. I hope there is careful analysis on the potential impact of motorized winter recreation use (including the use of grooming equipment) on winter habitat use by ungulates in this region. There are numerous guidelines to assess potential recreation impacts and I would like to see discussion on wildlife monitoring (Harris et al., 2014).

iv. Spring Re-developments

1. I would like to see additional considerations to assess the reasons behind sedimentation in reservoirs and spring damage. Slopes with sedimentation issues can be repaired using hand built structures designed to capture sediment and slow down water. These structures could be built utilizing local wood products and hand crews where appropriate.

g. Falls Creek/Hidden Valley Geographic Area

i. Fire Mitigation

1. Broadcast burning is a useful tool in this vegetation type.
2. Mastication of Gambel oak in areas surrounding historical properties seems like a tact that could be further analyzed. Masticated fuels can burn with long residence times and can have unsightly appearances after mastication work is completed. AN alternative could be to hand thin and maintain oak in areas adjacent to these structures. Hand thinning of oak could allow for the use of oak to make creative based and artistic wood product, provide fuel wood, and allow for the intentional maintenance of a more natural vegetation feel around structures relative to mastication.

Thank you for taking the time to consider these comments and I look forward to on going discussion of the management of these public lands adjacent to our community.

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