VIA Email: Kootenai National Forest - Home (usda.gov)

August 29, 2024

District Ranger
Canoe Gulch Ranger District
12557 US Highway 37
Libby, MT 59923

Dear District Ranger:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Norman McCedar Project.

AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities within and adjacent to the Kootenai National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

The Norman McCedar Project is located in the Canoe Gulch Ranger District of the Kootenai National Forest. The project is located approximately one mile southwest of Libby, Montana. The project area is approximately 6,100 acres and, in the Cedar, and Parmenter Creek drainages. Approximately 79 percent of the project area is located within the wildland-urban interface, established by the Lincoln County Community Wildfire Protection Plan (2013) and as used in the 2015 Kootenai National Forest Land and Resource Management Plan.

AFRC has been heavily involved in the Project's development including co-hosting a meeting and field trip on September 21, 2022, where the Forest provided an overview of the proposed action followed by a field trip to observe various landscapes and proposed treatments. Nine members of the public attended including representatives from AFRC, Stimson Lumber Company, Weyerhaeuser, Montana Department of Natural Resources and Conservation, Lincoln

County, and Montana Loggers Association. Following the field trip, AFRC submitted scoping comments on February 9, 2022.

The Project was placed on hold in 2023, due to a need to amend the forest plan. The Kootenai analyzed and submitted a forest plan biological assessment to the Fish& Wildlife Service (FWS) and the Forest received an updated biological opinion (BO) for the 2015 forest plan on November 28, 2023. The Kootenai signed a forest plan amendment for bears outside recovery zones (BORZs) in December 2023. This EA now considers updated BORZ Amendment information, and a carbon and climate change analysis based on regional and national templates that include the Kootenai National Forest and specific project area information.

Several current Directives make this landscape a very high priority for treatment. Those include:

1. Lincoln County has an Emergency Declaration asking the Forest to actively manage the Forest to increase forest health and reduce wildfire risk. The Norman McCedar Project is listed by the Forest as a project that fits under this Emergency Declaration.

2. In 2022 the Kootenai National Forest was awarded the Libby Surround Stewardship Joint Chiefs' funding to treat hazardous fuels on 4,605 acres of land surrounding the community of Libby, MT. The project is part of an ongoing cross-boundary effort to connect past, present, and future fuels treatments across lands of all ownerships. The Norman McCedar Project lies within the area identified for need.

3. The Kootenai National Forest was granted $19.3 million from the Bipartisan Infrastructure Investment and Jobs Act to plan and implement wildfire mitigation work on up to 7,200 acres in and around the Kootenai National Forest over the next two years. The Norman McCedar Project was identified as one of these high-risk areas due to its location to the greater Libby area.

4. The Norman McCedar project area was identified as a "priority area" within the plan for high fire risk and forest health concerns under the Montana Forest Action Plan.

With these four high-level directives to the Forest, the Kootenai has developed a Purpose and Need for the Project which AFRC supports. These include:

- Reduce fuel loadings within the Libby fire shed and wildland-urban interface to result in less intense fire behavior near communities and improve egress access to facilitate safer wildland fire operations.
- Improve the diversity and resilience of vegetative communities.
- Contribute to continued timber production and economic sustainability.

While AFRC strongly supports the Project going forward, we offer the following comments that we believe will strengthen and improve the Project.

1. AFRC and our members visited the Norman McCedar Project on September 21, 2022. We saw firsthand the heavy fuels and insect and disease damage prevalent in the area.

On the way to the project area, we drove through miles of Wildland Urban Interface (WUI) that is threatened by wildfire burning out of the project area. We also observed some areas that had been treated that we believe exemplify how the Norman McCedar area should look post-treatment. The picture below exemplifies a dense stand of mixed species timber.

The two pictures below depict a before and after scenario for what is expected in the Norman McCedar Project. The picture on the left shows dense stands of primarily Douglas-fir that need treatment and fuels reduction that we saw when we visited the project area. The picture on the right shows a treated stand nearby which reflects what the Forest hopes to achieve with treatments in the Norman McCedar area. The desired future condition for the project area is to have forests in a condition that have the capacity for renewal and recovery from disturbance. Forests in this condition have high ecological integrity and are diverse and productive. This includes healthy stand conditions, adequate seed sources and productive soils. We believe the stand in the right picture represents the desired end results for the Norman McCedar Project.

We are pleased to see that the Libby District is proposing commercial treatment of 2,234 acres in the Project although we will suggest later in our comments that more could be accomplished. While this is slightly fewer acres than identified in scoping, the Project will still yield an estimated 15 mmbf of timber to be harvested. Further we are pleased that the KNF was authorized to use the emergency action determination under Section 40807 of the 2022 Infrastructure Investment and Jobs Act (also known as the Bipartisan infrastructure Law) for the Norman McCedar Project. Section 40807 of the Infrastructure Investment and Jobs Act authorized the secretary of agriculture to determine that an emergency exists and where implementing emergency action is necessary to achieve relief from hazards threatening human health and safety and/or mitigating threats to natural resources on National Forest System land or
adjacent lands of other ownership. Thus, this document is only required to include a proposed action and a no action alternative. There will be no objection period.

The Norman McCedar project is located in a critical area that needs landscape scale fuels treatment to help protect the town of Libby from wildfire. This project area lies directly West of Libby and directly adjacent to private property, primary residences, state highways, a mainline train route, power and communication lines, and other values at risk.

To help address the first Purpose of lessening the chance of intense fire behavior near communities, the desired stand conditions and fuels arrangement of these stands would modify wildfire behavior by keeping fire on the ground, allowing for direct-attack fire suppression on a typical burn day, especially in the WUI. Forests in this condition following treatments provide recreational opportunities, attract visitors and tourists, and help provide an economic benefit to local communities.

2. AFRC and our members are very pleased that one of the Purposes of the Project is to contribute to continued timber production and economic sustainability. As with most of our comment letters, AFRC would like the District to reassess the project area to determine if more acres warrant commercial treatment to remove dead and dying material and provide more sawlogs, poles and firewood to the local markets that depend on these materials. There are 5,670 acres of General Forest areas where vegetation and watershed restoration is accomplished predominantly through active management. . AFRC would encourage the Forest to treat all available acres in this area. Treating more acres also adds to the timber volume that will be produced. The National Forests in Montana are very important for providing the raw materials that sawmills within the State need to operate. The timber products provided by the Forest Service are crucial to the health of our membership. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Specifically, studies in Montana have shown that 12-15 direct and indirect jobs are created for every one million board feet of timber harvested. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the way these products are permitted to be delivered from the forest to the mills.

   Additionally, Montana's forest products industry is one of the largest components of manufacturing in the state and employs roughly 7,000 workers earning about $300 million annually. Much of the industry is centered in western Montana, and this Project is crucial to the infrastructure located in and around the Kootenai National Forest.

   Further, AFRC members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public. This supply is important for present-day needs but also important for future needs. This future need for timber products hinges on the types of treatments implemented by the Forest Service today. Of importance is how those treatments affect the long-term sustainability of the timber resources on Forest Service

managed land. Not managing the maximum number of acres today will impact the ability to produce the timber needed in the future.

Table 2 below from the Economic Analysis section of the Draft EA highlights the importance for job creation of the Norman McCedar Project. It is important to note that these may not be new jobs or income, but rather existing jobs and income in the regional economy that are supported or sustained by this Project. It is anticipated that the timber harvest and majority of the restoration activities would occur over a 9-year period. If the actual implementation period is shorter than this, more jobs would be supported over a shorter period. Conversely, if the implementation period is lengthened, fewer jobs would be supported annually, but for a longer period.

Table 2. Average Annual Employment and Labor Income Contributions from all Project Activities.

Analysis Item	Alt. 2 – Proposed Action
Direct Employment	20
Indirect and Induced Employment	24
Total Employment	44
Direct Labor Income (Thousands of 2023 $s)	993
Indirect and Induced Labor Income (Thousands of 2023 $s)	843
Total Labor Income (Thousands of 2023 $s)	1,837

3. Regarding the third Purpose of the Project, "Improve the diversity and resilience of vegetative communities," the District has done an excellent job of outlining the current conditions and species makeup of the stands, especially where the need to use regeneration harvests is concerned. The use of clearcuts would create conditions that would allow for the reduction of forest fuels created from significant insect and disease activity and prepare the site for regeneration of long-lived early seral species. The table below outlines the desired improvements in species composition by implementing the Project. As you can see, the stand composition is very much out of balance with too much Douglas-fir and a deficit of fire resilient species such as western larch, western white pine, and ponderosa pine.

Table 7. Existing and desired forest type distribution by biophysical setting.

Forest Type	Warm/Dry Existing Forest Type (%)	Warm/Dry Desired Forest Type (%)	Warm/Moist Existing Forest Type (%)	Warm/Moist Desired Forest Type (%)
Douglas-fir	81	2-5	82	2-5
Western Larch	0	43-46	4	44-47
Western White Pine	0	1-4	0	13-16
Ponderosa Pine	12	35-38	4	3-6
Lodgepole Pine	0	3-6	<1	4-7
Engelmann Spruce/ Subalpine Fir	0	0-3	< 1	7-10
Grand Fir	0	2-5	0	2-5
Western Red Cedar/ Western Hemlock	<1	0-3	2	7-10

Forest type is defined here as the most abundant tree species and determined using the VMap DomMid40 attribute.

Regeneration harvest treatments would all result in openings. Ten of the openings would be larger than 40 acres (ranging from 46-297 acres), either on their own or in combination with other regeneration harvest units. For the Norman McCedar Project, exceeding the opening size of 40 acres would require approval from the Regional Forester and a 60-day public review period prior to the responsible official making a final decision to approve the project. AFRC supports the use of creating openings larger than 40 acres and agrees that this combined scoping and comment period should serve as the notification to the public of the start of the 60-day public review period. A total of 11 openings larger than 40 acres would be created and would require Regional Forester approval prior to implementation. Openings are irregularly shaped and follow natural features, terrain, and stand conditions. The openings would range from 44 acres to 299 acres. Again, AFRC supports this action.

Where selective thinning work will be done in areas being commercially thinned, shelterwood harvests, or improvement cuts, AFRC suggests lowering the basal area in these areas to 40 sq. ft. per acre. This will not only reduce the fuel loadings to meet desired results, but it will also increase the vigor and growth of the residual trees.

4. AFRC appreciates the District's approach to the conduct of commercial harvest. The Project proposes methods for tree removal in units with commercial products that would include ground-based mechanized harvest and cable systems. Ground based harvest includes processes like cut-to-length systems which utilize a harvester and forwarder to carry processed logs as well as a skidder which lifts the leading end of the logs being dragged. Cable systems include typical skyline harvest systems where logs are dragged to the landing via cable, or cable-tethered equipment that may be used within the unit to fell, yard, and complete project activities. Other criteria include ground-based equipment may be utilized in portions of skyline-tether harvest units where slopes are generally less than 40 percent, and tethered equipment may be used in harvest units on slopes no steeper than 70 percent post-harvest methods described below would be used to reduce and remove activity generated and natural fuels.

Additionally, we would like the District to recognize that one of the primary issues affecting the ability of our members to feasibly deliver logs to their mills is firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on **descriptive end-results**; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the Kootenai market area with a variety of skills and equipment. Developing this EA and future contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the EA and contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. If some of the proposal area is planned for cable harvest, there could be opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and feller-bunchers throughout these units can greatly increase its economic viability, reduce damage to the residual stand, and provide a more even distribution of woody debris following harvest by decreasing the amount of cable corridors. Please prepare your NEPA analysis documents in a manner that will facilitate flexibility in the use of various types of equipment. AFRC believes that the impacts could even be less than those analyzed by permitting some of the lighter touch logging methods outlined above.

Finally, AFRC would like the Forest to examine the days that operations and haul are shut down due to hunting seasons and other outdoor recreation. The logging community has limited operating time at best, and further reductions such as these only makes surviving in the logging business that much more difficult.

5. AFRC supports the District managing in the old growth areas. The proposal includes 111 acres of intermediate harvest in old growth stands or mature forests approaching old growth using hazardous fuels treatments located along strategic topographic locations and adjacent to private lands. These treatments would not reduce the number of large old trees in any stand, nor would they alter the stands in a manner that would cause them to no longer function as old growth following treatment. Three units would be improvement cuts in existing old growth stands, thinning the stands from below, focusing on intermediate and suppressed trees from younger cohorts and leaving a stand that meets old growth standards.

6. AFRC appreciates the District preparing a factual and descriptive No Action Alternative that shows the potential devastation to the forest, loss of private property, and potential

loss of life should a wildfire initiate in or expand into the project area. In addition, it would be helpful to consider the losses which occurred during the recent large fires in the immediate area such as West Trout, South Yaak, and the Callahan Fire. As your data shows it is just a matter of time before the unhealthy, dense stands in the Norman McCedar area are impacted by catastrophic wildfire. We strongly believe this would be informative data should this Project be litigated. The court would have to look at the No Action Alternative and weigh the consequences of not implementing the Project.

Additionally, the document states that with treatments *"Forest density would be reduced in treated stands as trees are removed or killed. The reduction in density allows remaining trees more available growing space, improving their access to light, water, and nutrients.* ***This increase in vigor would produce larger trees faster than in the no-action alternative."*** AFRC believes this is another reason to highlight the negative impacts of a No Action Alternative.

7. AFRC is pleased that your analysis showed that neither the No Action Alternative nor proposed action would affect threatened, endangered, or sensitive plants species. There are no documented occurrences of any of these species in the project area. There are approximately 40 acres of Whitebark pine potential habitat existing at the highest elevations of the western edge of the project area. The closest treatment unit to this area of potential habitat is approximately 3,500 feet. Design features included would mitigate impacts to unknown populations if found during implementation.

   In recent years, consideration of grizzly bears has caused constraints on project implementation regardless of the presence of bears. The District has found that design features for cover retention, timing restrictions for spring emergence, and road restrictions to public motorized access would decrease effects to seasonal habitats and for motorized access. Proposed activities for the Modified Proposed Action have been designed to be compliant with grizzly bear access management direction in the 2015 Forest Plan. Consultation with the FWS for grizzly bear would be completed on proposed activities before the decision is finalized for the Project.

   Regarding Canada lynx, another threatened species, the preliminary determination for the Project's effect on critical habitat is no effect. On the Kootenai, critical habitat is north of US Highway 2. The proposed project is in the Treasure LAU south of US Highway 2. No project activities are proposed in Canada lynx critical habitat.

8. AFRC supports the proposed Road Management activities associated with the Project. This includes (see chart below):

Table 5. Road Work Summary

Road Action	Approximate Total Miles
Roads to be opened to allow access for management activities	12.7
21 segments of road to be stored for grizzly bear management	16
Haul Route Road Reconstruction/ Maintenance	36.0
Temporary road construction	0.3
Permanent road construction	3.0
Private Road Use	1.0

- Temporary roads would be constructed to the minimum standards necessary for log hauling on NFS roads. Some temporary roads would be constructed on existing road templates, and some would involve new construction. All temporary roads would be rehabilitated following timber harvest activities and would cease to function as roads.
- Approximately 3 miles would be built and placed on the NFS road system following construction. All roads proposed would be closed year-round by existing gates or barriers on the system road they extend or spur off.
- The existing system roads with changing seasonal closures dates would be changed to improve public access, and improve closure efficiency, 12.7 miles of seasonally open roads. The roads would remain seasonally open from July 1 to October 14 and would be closed to motorized traffic for the remainder of the year which is a change of the current road closure dates where the roads are open from July 1 to August 31.

While AFRC supports the Road Management Proposal we offer some suggestions for implementation. First, we believe that no roads should be built in the old growth areas. The small segment proposed could be rerouted, avoiding any controversy in that area.

In a broader sense for this Project and others on the District, we would like to remind the Forest that an intact road system is critical to the management of Forest Service land, particularly for the provision of timber products in the general timber designated lands. Without an adequate road system, the Forest Service will be unable to offer and sell timber products to the local industry in an economical manner. The land base covered in the Norman McCedar area is to be managed for a variety of forest management objectives. Removal of adequate access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us. Roads proposed for decommissioning should be assessed to determine if objectives could be met instead by road closure using barriers or blockage of the road entrances. AFRC does not support obliteration or recontouring roads that are to be decommissioned because of the high cost involved and the potential future need of those roads. However, we do support gating and the placement of barricades, logs, debris or other obstructions and the front of roads to be put to bed.

Furthermore, there are alternative methods to mitigating potential resource damage caused by poorly designed or poorly maintained roads aside from full decommissioning. Removing or replacing ineffective culverts, installing waterbars, and blocking access are all activities that can mitigate resource damage while maintaining useful roads on the landscape for future use. Please consider these methods as an alternative to full decommissioning.

AFRC believes that a significant factor contributing to increased fire activity in the region is the decreasing road access to our federal lands. This factor is often overshadowed by both climate change and fuels accumulation when the topic of wildfire is discussed in public forums. However, we believe that a deteriorating road infrastructure has also significantly contributed to recent spikes in wildfires. This deterioration has been a result of both reduced funding for road maintenance and the federal agency's subsequent direction to reduce their overall road networks to align with this reduced funding. The outcome is a forested landscape that is increasingly inaccessible to fire suppression agencies due to road decommissioning and/or road abandonment. This inaccessibility complicates and delays the ability of firefighters to attack fires quickly and directly. On the other hand, an intact and well-maintained road system would facilitate a scenario where firefighters can rapidly access fires and initiate direct attack in a more safe and effective manner.

If the Forest Service proposes to decommission, abandon, or obliterate road segments from the Norman McCedar Project area we would like to see the analysis consider potential adverse impacts to fire suppression efforts due to the reduced access caused by the reduction in the road network. We believe that this road network reduction would decrease access to wildland areas and hamper opportunities for firefighters to quickly respond and suppress fires. On the other hand, additional and improved roads will enable fire fighters quicker and safer access to suppress any fires that are ignited.

We would like the District to carefully consider the following three factors when deciding to decommission any road in the project area:

- Determination of any potential resource risk related to a road segment.
- Determination of the access value provided by a road segment.
- Determination of whether the resource risk outweighs the access value (for timber management and other resource needs).

We believe that only those road segments where resource risk outweighs access value should be considered for decommissioning.

9. AFRC would like the Forest to consider implementing shaded fuel breaks along some of the major ingress and egress roads. These shaded fuel breaks should extend to at least 200 feet on each side of the road for not only fuel breaks, but also to improve forest health. These fuel breaks would also protect the public should a fire break out and a safe travel corridor be needed.

10. AFRC believes that the use of Designation by Prescription might be a good option for designating the trees to be harvested and those to be retained especially in commercial thinning, seed tree, and shelterwood harvests. The goal of the Project is to remove shade tolerant species and shift towards more western larch, western white pine, and ponderosa pine. Prescriptions can be written to accomplish this.

11. Since the scoping document came out in 2022, the District has completed a very extensive carbon report. This report states: "*The Norman McCedar project assesses carbon stocks in addition to other ecosystem benefits. The anticipated impacts to carbon stocks from implementing the project include long-term carbon gains from proposed vegetation and fuels management activities (see forest vegetation report for details). Carbon losses could result in the short-term from proposed timber harvest and prescribed burning activities. Long-term carbon gains would be expected from prescribed treatments, to increase heterogeneity and fire resiliency of forest stands in the project area (Loudermilk et al. 2017). Compared to the no action alternative, the proposed actions are predicted to foster carbon stewardship and increase resiliency to ecological disturbances (e.g., disease, drought, high-severity and intensity wildfire).*"

    In addition to this report, AFRC believes there is some very good literature that supports implementation of the Project because of the positive impacts to carbon and climate. We would like the Forest to supplement their Carbon discussion in the EA by considering the points below from a technical report by the Climate Change Vulnerability Assessment and Adaptation Project (SWOAP) in Southwest Oregon.

    - Wood harvested from the forest, especially timber used for durable structures, can be reservoirs of long-term carbon storage (Bergman et al. 2014).
    - Forests and their products embody a closed-loop system in which emissions associated with harvests and product use are eventually recovered as forests regrow.
    - Although products may be retired in solid waste disposal sites, they decompose quite slowly, causing carbon to continue to be stored for many decades.
    - Products derived from the harvest of timber from national forests reduce carbon emissions by substituting for more energy-intensive materials including concrete, steel, and plastics.

    Please see the graph below from the IPCC (2007) that captures the ability of forests to "stack" carbon sequestration and storage through continual harvests. **Please consider adopting this graph into the Norman McCedar project analysis.**

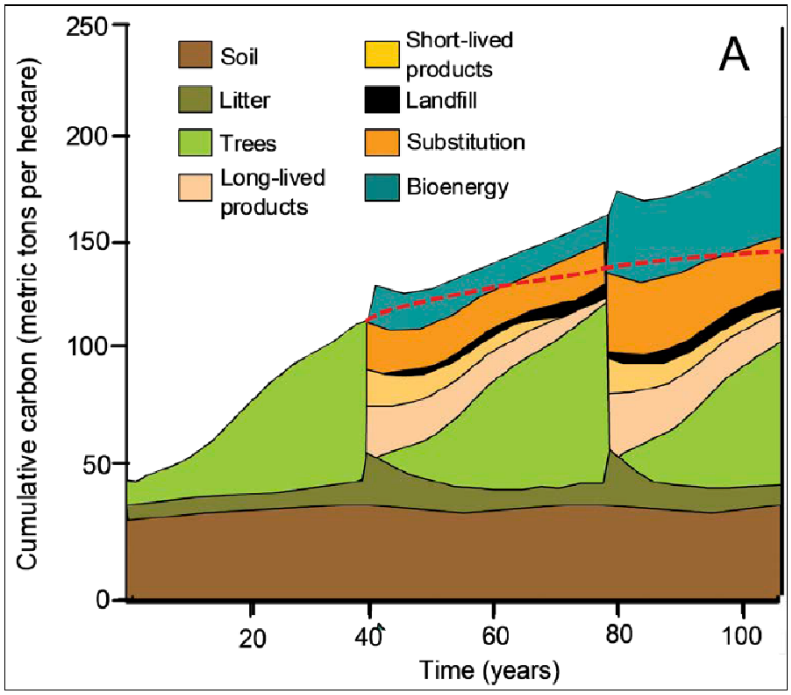

Figure 8.7—Carbon balance from a hypothetical forest management project in which the forest is harvested roughly every 40 years from land that started with low forest carbon stocks. This figure accounts for forest regrowth and carbon stored in wood products in use and landfills as well as the prevented release of fossil fuel carbon (also counted as stored carbon) via product substitution and biomass energy. It illustrates how forests can continue to accrue carbon over time with forest management. Figure is from McKinley et al. (2011) and adapted from IPCC (2007).

We believe that this graph encapsulates the forest management paradigm that would be most effective at maximizing carbon sequestration on a per-acre basis by "stacking" storage in wood products and regrowth of newly planted trees.

We would like to encourage the Libby District to consider several documents related to carbon sequestration related to forest management.

McCauley, Lisa A., Robles, Marcos D., Wooley, Travis, Marshall, Robert M., Kretchun, Alec, Gori, David F. 2019. Large-scale forest restoration stabilizes carbon under climate change in Southwest United States. *Ecological Applications*, 0(0), 2019, e01979.

Key points of the McCauley paper include:

- Modeling scenarios showed early decreases in ecosystem carbon due to initial thinning/prescribed fire treatments, but total ecosystem carbon increased by 9–18% when compared to no harvest by the end of the simulation.
- This modeled scenario of increased carbon storage equated to the removal of carbon emissions from 55,000 to 110,000 passenger vehicles per year until the end of the century.
- Results demonstrated that large-scale forest restoration can increase the potential for carbon storage and stability and those benefits could increase as the pace of restoration accelerates.

We believe that this study supports the notion that timber harvest and fuels reduction practices collectively increase the overall carbon sequestration capability of any given acre of forest land and, in the long term, generate net benefits toward climate change mitigation.

Gray, A. N., T. R. Whittier, and M. E. Harmon. 2016. Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity. Ecosphere 7(1):e01224. 10.1002/ecs2.1224

Key points of the Gray paper include:

- Although large trees accumulated C at a faster rate than small trees on an individual basis, their contribution to C accumulation rates was smaller on an area basis, and their importance relative to small trees declined in older stands compared to younger stands.
- Old-growth and large trees are important C stocks, but they play a minor role in additional C accumulation.

We believe that this study supports the notion that, if the role of forests in the fight against climate change is to reduce global greenhouse gasses through maximizing the sequestration of carbon from atmospheric CO2, then increasing the acreage of young, fast growing small trees is the most prudent management approach.

Additionally, we encourage the Forest to review the following article by Neil G. William and Mathew D. Powers which outlines that *"Researchers found no significant differences in carbon stocks between unmanaged stands and thinned stands, which had generally undergone treatment to 30-40 years before sampling. This lack of difference between unmanaged and thinned stands suggests that, in just a few decades, stands recover carbon removed by thinning."*

The researchers also pointed out *that "Moreover, estimates of carbon storage in our sample of mature stands do not include stocks in harvested wood products, and may therefore underestimate total carbon storage, on- and off-site, achievable using active management."*

The link to the article can be found at: Carbon storage implications of active management in mature Pseudotsuga menziesii forests of western Oregon

Thank you for the opportunity to provide Draft EA comments on the Norman McCedar Project. We strongly support the Project and the District's goal to implement it quickly to address the severe wildfire and forest health threats. We look forward to a quick decision date and the timber sales being auctioned.

Sincerely,

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