Data Submitted (UTC 11): 3/31/2021 3:36:06 AM First name: Forest Last name: Shomer Organization: Inside Passage Seeds Title:

Comments: I advocate for Alternative 2, modified to give additional consideration to identifying Riparian Reserves and treatment plans in riparian areas, particularly within the Canyon Creek subwatershed. I believe this alternative will restore ecological processes to improve the health of this forest in the long term, while safeguarding soils and habitat in the short-term, and still provide commercial return for timber products.

The EA has a potential misidentification of Riparian Reserves, especially within the Canyon Creek subwatershed. Proper Riparian Reserve designation is critical to the protection of riparian habitat conditions and the achievement of the Northwest Forest Plan's Aquatic Conservation Strategy objectives.

The potential short-term impacts of Variable Retention Harvest are concerning, including opening up the canopy, altering hydrologic patterns, and impacting stream flow and sedimentation in Canyon Creek's sensitive fish habitat.

Also concerning is the potential for increased landslides or mass-wasting events due to soil disturbance, root instability, and a loss of vegetation cover, particularly in the steep and unstable landslide-prone terrain of the Canyon Creek subwatershed.

The EA fails to quantify the existence and distribution and quality of complex early seral habitat across the landscape that includes non-federal lands adjacent to the project area.