Data Submitted (UTC 11): 4/3/2021 9:15:19 PM First name: Kim Last name: Clarkin Organization: Title:

Comments: First let me say that I am in strong support of reducing density in overstocked stands that will be or are vulnerable to insect/disease/fire threats. I also strongly support the improvements in road drainage conditions you are planning. I agree they will reduce the likelihood of sediment delivery to Canyon Cr by debris flows and other mass wasting events, and I wish you could do more.

This EA is poorly written, confusing, repetitive, conflicting and incomplete in how it talks about alternatives and effects. This problem is so extreme that the narrative is quite hard to follow, and it took up far too much of my time as I tried to unravel what is meant to happen and how it would be implemented. It would be very worthwhile to hire a good technical editor.

The EA only allows us to understand what your intentions are, not what the actual environmental effects would be. I support your intentions, but do not trust that you know the landscape well enough to implement this project without environmental damage. Damage can occur at many scales, but much is site specific. We can't predict it if we don't really know the ground. The EA gives the impression of having been written by people looking at research articles and maps, not the ground. It is rife with generalities and sparse on specifics. It may indeed be true that harvest and road work are so spread out that effects will be undetectable at the watershed scale, but that is not likely to be true at more local scales, and local damage can be significant.

I looked for the no-action alternative. There is no clear-cut description of existing condition of all resources, and their trajectories in the event of no action. There are a few indications regarding some resource characteristics scattered through the specialist reports, but no clear picture of the project area emerges. Yes, I suppose we could go back to the watershed assessments from decades ago if we really wanted to know how the area was then.

The Alternatives. Personally, I do not have a problem with clearcuts, but I would like to know how large they are and what the effects are expected to be on low-order streams draining them. Maps on a screen don't convey actual sizes, nor do they show actual channel drainage densities in such a way that a reader can see them and understand the relationship with harvest units. The EA leaves me with many doubts about whether the writers have been on the ground enough to detect potential problems with channel stability, especially in the very dynamic Canyon Cr watershed.

I support the idea of variable density of uncut areas, especially based on soil productivity; however, it is unclear how the 'variable retention harvest' units would be laid out, who would decide where to cut and what to leave, and whether mass wasting potential would be considered. The design criteria included in the soil/water mitigation measures in App A seem to rely on the pre-sale crew's goodwill, and their extensive knowledge of logging systems, soils, and the landscape in general. The quality of the EA does not give me confidence that a district this hurried and possibly under-staffed can put well-designed units on the ground. The sale administrator should not be expected to make up for poor layout and design.

Water I found no information on the effects of the project on snow retention, rain-on-snow runoff, flood potential, or channel destabilization. These are all important issues that forest removal and road reconstruction and use affect. Given the past channel stability problems in Canyon Cr, one would think these are critical issues to be analyzed, especially given the changing climate. I would like to know how the project alternatives will change these hydrologic and geomorphic characteristics and how downstream flows and channels might be affected. Mass wastingThe only mention I found of how landslide potential was evaluated in planning was that unstable areas and those considered vulnerable to human disturbance were avoided (EA p48). Nonetheless a couple of units are said to be within the mapped boundaries of two deep seated slides. I didn't understand how that decision was made and how those units will be harvested in such a way as to avoid mass wasting problems. Will you have to reconstruct roads that access those units? Will you have to decommission them after use? How do

## you expect that disturbance to affect mass wasting?

Riparian ReservesAfter all the confusing discussion of the pros and cons of harvest in the riparian reserves, I am uncertain about what the expected effects of thinning them are. It would seem to me, generally speaking, that if a felled tree that would act as LWD can reach a stream, it should be felled in that direction and left, not removed. It makes sense to try to get larger trees in a riparian reserve, but these are also areas of wet and unstable soils I believe. If you explained how logging systems will protect the ground from compaction and gouging, and protect wet areas, I missed it.

Thank you for allowing a very concerned public to comment on your proposed actions. Hopefully you will have zoom open houses or zoom meetings of some kind that will allow people to daylight their questions and allow you to answer them. I sincerely hope you can make time to produce a better assessment for the next draft.