

Data Submitted (UTC 11): 8/13/2021 8:32:25 PM

First name: Ciff

Last name: Shaw

Organization:

Title:

Comments: Comment 1- According to page 43 in the Revised Draft EA July 2021- "Some site-specific actions (i.e., recreation actions, road/trail decommissioning or restrictions, old growth allocations) would be authorized for implementation based on this programmatic analysis, whereas other actions are expected to require subsequent NEPA reviews to be tiered to the programmatic analysis (e.g., a forthcoming site- or project-specific document)." This statement is confusing as it relates to old-growth allocations. Because identified old growth in the Foothills Project area is deficient (i.e. not meeting the 5% minimum) on "2,388 acres in 13 applicable watersheds" (page 49, Revised Draft EA) how can old-growth allocations "be authorized for implementation based on this programmatic analysis" when presumably the new areas of designated old-growth required to meet the 5% minimum areas have not been identified in this Revised EA? The Final Foothills EA should specify when and how the required additional acres of old-growth needed to comply with the 5% old-growth objective will be identified and mapped. The final EA should also state that all newly identified old-growth areas in the Foothill Project Area will receive the same protection afforded to those areas already identified in the 2004 CONF Forest Plan as "Areas Managed to Restore or Maintain Old-Growth Characteristics" (Prescription 6.B).

Comment 2- The Revised Draft EA July 2021 is more confusing to the average reader than the original EA December 2019. The Revised EA contains 63 tables while the original EA contained only 23 tables. The Revised Draft EA's "Project Area Description" alone (which has 28 pages compared to only 7 pages in the original EA) includes at least half dozen tables with long lists of acreage figures, which to the average reader are meaningless. To reduce confusion, it is recommended that many of the tables in Revised Draft EA (and especially in the Project Area Description section) be summarized in the Final EA and then moved to, and referenced, in the Appendix. Another factor affecting readability is the profusion of acronyms and technical jargon in the Revised Draft EA. Therefore, as was done in the 2004 Forest Plan, it is recommended that a Glossary of terms and acronyms should be added to the Final EA.