Data Submitted (UTC 11): 3/20/2022 3:52:14 PM

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Title:

Comments: This project overlaps the Westside Project. Both this project and the Westside project are proposed as condition-based management projects. What I interpret that to mean is that in both projects, you will not be able to tell us specifically what you will be doing, where it will happen, and how much of it will happen before you make your decision. This involves a whole lot of trust with the public. I and others feel that this trust was badly abused with the BHRL project. In that project, it was specified that logging would occur within pre-determined potential commercial treatment areas. That was not followed and the Forest only made a correction after it was pointed out by outside entities. Why should we trust the Forest to do the right thing now?

How will you be able to evaluate the cumulative effects of these two projects when you will not know what will take place and where? How can you sign a Finding of No Significant Impact for both of these projects, when you will not know what will take place and where? The only way you can do that is to assume that there is nothing you will do that will create a significant impact. This is not serious analysis. After you sign the decision for this project, and eventually get around to deciding what you will actually do on the ground, the public really has no recourse in addressing their concerns once they finally find out where things will happen. Work to regain your trust with the public and tell them what you will do, before you sign a decision.

I propose an alternative for this project. Limit your cutting in spruce to 2,000-3,000 acres with the purpose being to create age-class diversity in spruce. Regenerate these areas to spruce. Identify the cutting units prior to signing the decision. Forget about this condition-based management silliness. This area is not experiencing dynamic change and there is no justification for it. It is simply a lazy way of doing NEPA that excludes the public from adequately participating in the process.

Limit timber harvest activities to 30% slopes and winter logging in order to limit ground disturbance. Stay well clear of wetlands, fens, riparian areas and only operate in upland areas. Do not exceed the 40-acre limit for regeneration cuts. There is really no reason to exceed this other than efficiency for logging. This does not comply with the spirit of NFMA and its limit on 40 acres.