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Organization:

Title:

Comments: Dear NEPA Planner Ashley Popham and District Ranger Kameron Sam:

First off, I would like to say that I support the prescribed burning proposed for this project. It is an important aspect of forest health, especially for the dry forest types in this project, and I am glad to see the Forest Service moving toward using more fire. I am also glad to see the changes between the scoping proposal and this one, pointing to a meaningful engagement with public comments received. However, there are still a number of aspects of this project I find concerning.

-Shelterwood alternative:

I advocate the Forest Service not choose the shelterwood alternative. Applying shelterwood in these moist, mixed stands is hasty and unnecessary for the project. Having been in units in Grasshopper project and seen the uniform, brushy stands created by previous plantations, the idea of purposely creating more of these conditions seems opposite to many of the goals of this project, including lowering fire severity. With a loss of 85% canopy cover, conditions would be hotter and drier, and would introduce a long period of stands dominated by younger, brushier trees and early succession shrubs. In this era of climate change, it also has the potential to drastically change the forest type with colonization of more pines. As moist mixed forest habitats face greater threats, this loss of acres could matter more now than it would have in the past.

-Fuel break:

With or without the shelterwood alternative, I am also concerned about the fuel break in general. While I understand this fuel break location is a compromise, it seems like it will largely be ineffective as-is. It is far from communities, and in a forest type that experiences less frequent, higher-severity burns, which makes its usefulness less likely to coincide with a fightable fire. It would also be disruptive to ecological function. A better alternative could be committing to more frequent controlled burns in sections farther east and closer to towns.

-Climate change:

While this project has taken a step toward acknowledging and accounting for climate change, I don't think it does enough to confidently say that its impacts to carbon emissions would be inconsequential. The climate report states that the project would make "an extremely small contribution to overall emissions." Judged against national or global standards, of course that is true, but it is also true for basically every source of carbon emissions. Just because a source is negligible on a global scale does not mean its emissions aren't meaningful. Taken as part of a larger schema of timber sales and other projects across the MHN and all national forests, there is quite a lot of room for analysis and improvement on this and other projects. I do understand that carbon accounting is a complex task, but given the importance of forests in the Cascades in carbon sequestration, and the research showing greater rates of sequestration in older forests, I think this is a critical area to cover, and it is important for the Forest Service to begin documenting and assessing its climate impacts.

-Old growth stands:

I urge the Forest Service not to log in any stands with old-growth characteristics. What is left of these mature, complex stands should be saved, to provide habitat for spotted owl and other species, for carbon sequestration and other ecosystem services, and simply because throughout the Cascades, most of this age class has already been logged. For stands in the cold, moist forest type in particular, which are not out of their fire cycles, the severity of a fire here would much more likely be influenced by weather than by whether or not a stand has been thinned.

I am also worried by the loss of spotted owl habitat this project would cause. The loss of 1,200 acres of habitat seems avoidable, and I would like to see an alternative that prioritizes keeping habitat. Avoiding NSO habitat

would also focus efforts to more densely-stocked, even-aged plantation stands, where thinning would be more beneficial.

-Temporary roads:

I am perplexed at why locations (even preliminary) of proposed temporary roads have not been released. The purpose of public comments is to solicit information and opinions on proposed plans, and that is impossible when the plans are not fully disclosed. I would appreciate a map of proposed roads to be released as soon as possible, as well as an explanation of why that information was withheld in the first place. To my knowledge, withholding road information is not common practice in timber sales.

Thank you for engaging with these concerns,
Llewyn Whipps