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Comments: Thank you for the opportunity to comment on this project. I am concerned about a lack of diligence visible in the initial proposals for Pole Creek Vegetation Management Project #61834. It will have a long timeline and be high impact. The decisions made during this scoping period will influence our community, the forest's health, and the user experience for generations to come. Yet it isn't clear how the proposed treatment areas were chosen. The explanations given to the public so far lack detail and backing. In public meetings, USFS representatives have not expressed intent to rectify or address many of these weaknesses.

For instance, the scoping documents recommend a 1/2 mile barrier around structures in the project area. It isn't clear where this recommendation came from. Academic research recommends that 100-200 feet is a recommended buffer for defensible space. In the January 26 public meeting, a Forest Service representative called the 1/2 mile buffer a "GIS exercise". I would expect greater diligence to be taken with these types of decisions, and for the choices to be backed by the best available science.

I agree that wildfire mitigation is critically important. That is why this work in our forest should be executed to the highest standards understood today. If USFS believes the scenarios presented in this proposal are indeed the best possible for wildfire mitigation, that rationale should be available to the public, with documentation. If not, the plan should be amended to reflect best practices.

In the January public meeting held in Buffalo, a Forest Service representative said that no socioeconomic studies had been undertaken or would be undertaken with regard to this project. This is a grave oversight and further shows lack of diligence. I urge reconsideration of that decision.

As an example, some of the proposed clear cut areas fall directly on the Pole Creek Nordic Ski area, which has been maintained and grown as a community and tourism resource for decades. Because of local winds, removing tree cover would destroy the ability of the area to hold snow. This would remove a tourism resource for Buffalo (many users are from out of county and must drive through town on their way to the trails) as well as an important health benefit as local users of all ages are present at Pole Creek on any given day. Broadly accessible, low-cost winter outdoor recreation opportunities are rare, and Pole Creek is a valuable, established, and critical one for our community.

As the Pole Creek Nordic Ski area represents a small fraction of the overall project area, I would request you remove it entirely from the proposed treatment areas, maintaining a buffer around the outer trails to protect this valuable resource and the community's hundreds of thousands of dollars in in-kind and monetary contributions devoted to creating and maintaining it.

Additionally the profitability of the timber sale itself is not clear. To the extent that contracts are awarded to out-of-county vendors, our county will lose resources in the form of wildlife habitat, recreation and health, scenic and wilderness experience, and tourism, without documented benefit. Based upon the public meeting and scoping documents, it isn't clear that the benefits and costs of this highly consequential project have been thoroughly considered. I request a higher level of transparency and general information about how the project areas were chosen, and how they perform in a cost-benefit analysis that takes into account socioeconomic and ecological impacts, with documented scientific backing.

That is particularly important through the lens of climate change. A recent study, published in Forest Policy and Economics, found that rising average temperatures and shifting precipitation patterns will impact tree growth and timber harvests. This study, conducted by experts from North Carolina State University, had a focus on the

southern United States. However, its findings have important implications for the decisions made in this project. Similar experts in our region should be consulted, and that level of analysis should be considered and publicly available for this project. According to an E&E news article on the study, researchers said these changes could disrupt markets for U.S. forest products, leading the price of softwood lumber to jump 32% by 2050. To the extent that Pole Creek Vegetation Management Project #61834 undergoes any economic analysis, a discount rate reflecting the higher future value of lumber should be applied. As regards ecological analysis, it is critical to assess, to the best of our ability at this time, how a range of climate scenarios would impact the regrowth rate of the trees and the species that will thrive in the future. That analysis should cover a range of scenarios and show a clear through line to the decisions made today. Forest recovery will not be the same in the future -- this must be taken into consideration in a project of this size. As more research comes to light over the course of the project, provisions for updating the plans should be incorporated into the final decisions.

Thank you for your time and consideration. I look forward to engaging with you on this project in the future.

Mara Abbott