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Title:

Comments: I appreciate the opportunity to comment on the Black Diamond Landscape Resiliency and Risk Reduction project. While I recognize that global climate change and a history of fire suppression are affecting the Roosevelt National Forest, I also believe that cutting and burning the forest, including in back-country roadless areas, can have negative and even exacerbating consequences for this public resource. Recently published information from FS staff and U of Montana staff suggest "that retaining canopy cover, even from standing snags, moderates microclimate conditions. Management actions that remove standing dead trees could further increase microclimate extremes, with the potential to impact seedling survival and regeneration." Also, In 2020, over 200 scientists, including dozens of the nation's top forest and fire experts and climate scientists, sent a letter to Congress concluding the following; "mechanical thinning results in a substantial net loss of forest carbon storage, and a net increase in carbon emissions that can substantially exceed those of wildfire emissions (Hudiburg et al. 2013, Campbell et al. 2012). Reduced forest protections and increased logging tend to make wildland fires burn more intensely (Bradley et al. 2016). This can also occur with commercial thinning, where mature trees are removed (Cruz et al. 2008, Cruz et al. 2014). As an example, logging in U.S. forests emits 10 times more carbon than fire and native insects combined (Harris et al. 2016). And, unlike logging, fire cycles nutrients and helps increase new forest growth."

Noting this, the proposed action will have significant impacts to the environment and should require an Environmental Impact Statement (EIS). Furthermore, the proposed Conditions Based Management approach does not provide the public a sufficient understanding of where or when specific activities will occur. This makes it very difficult to understand how the proposed action will impact any specific site within the project area. To fix this flaw, I ask the Forest Service to identify the locations and time frames of specific treatments and then analyze likely impacts.

Other issues with the project need to be addressed as well. Those include:

?Publicly disclosing how many miles of unclassified (illegal) roads will become temporary roads, and their location, to understand potential impacts of these roads.

?Committing to obliterating and/or recontouring all temporary roads constructed (classified or unclassified) to make them impassable within a year of their use. Putting boulders in front of access points or changing classification in the Forest Service system may be necessary but is not sufficient.

?Protecting all 8,311 acres of inventoried old-growth forest identified in the project area, with no treatments conducted on these acres. An old-growth forest is not easily created, and the Forest Service should allow old-growth forests to age unimpeded.

?Removing established roadless areas from consideration for any management actions, as they are not within the Wildland Urban Interface (WUI).

?Avoiding the disturbance of mycorrhizae fungi in the soil during thinning activities, especially during any commercial or mechanical harvesting. Preserving mycorrhizae can help forests recover from both impactful Forest Service treatments and naturally occurring wildfires. Potential impacts to mycorrhizae should be analyzed as part of an EIS.

?Minimizing impacts to threatened and vulnerable wildlife, including Canada lynx, Preble's meadow jumping mouse, elk, boreal owl, northern goshawk, and greenback cutthroat trout.

Thank you for providing this opportunity to comment.