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Comments: [External Email]Black Diamond Comments

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Dear Mr. Kuhnel,

Thank you for the opportunity to comment on the Black Diamond Landscape Resiliency and Risk Reduction project.

I realize that climate change and a history of fire suppression are affecting the Roosevelt National Forest, but I believe that that logging, thinning, and burning in four designated roadless areas would do irreparable damage to these public lands. These lands are home to at least two federally threatened species, Canada lynx and Preble's meadow jumping mouse, and other vulnerable wildlife.

The proposed action will do significant environmental damage and therefore requires an Environmental Impact Statement (EIS). Moreover, the proposed Conditions Based Management approach does not give the public sufficient understanding of where or when specific activities would occur. This makes it very difficult to understand how the proposed action will affect any specific site within the project area. To remedy this, the Forest Service must identify the locations and duration of specific treatments and then analyze likely negative consequences.

Other issues that need to be addressed in the future include:

1. Publicly disclosing how many miles of unclassified (illegal) roads will become temporary roads, and their location, to understand impacts of these roads.
2. 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.
3. Protecting all 8,311 acres of inventoried old-growth forest identified in the project area, with no treatments conducted on these acres.
4. Removing established roadless areas from consideration for any management actions, as they are not within the Wildland Urban Interface.
5. Avoiding the disturbance of mycorrhizae fungi in the soil during thinning activities, especially during commercial or mechanical harvesting. Preserving mycorrhizae helps forests recover from both impactful Forest Service treatments and naturally occurring wildfires. Potential impacts to mycorrhizae should be analyzed as part of the EIS.
6. 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.

Signed,

Carol Steinhart

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