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Comments: [External Email]Black Diamond Comments

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Dear Mr. Kuhnel,

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.

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, the Forest Service must identify the locations and time frames of specific treatments and then analyze likely impacts.

Other issues with the project need to be addressed in the future. 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.

Signed,

Allan Rubin

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