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Organization:
Title:
Comments: I spend time in this forest project area walking my dogs, hiking, and birding. Please address the following issues in your NEPA analysis of this project.
1-Analyze the impacts of logging on steep slopes of which this area has many. Logging on steep slopes should not happen.
2-Include forest studies conducted by Chad Hanson, Beverly Law, Dominick DellaSala and others when analyzing "old growth restoration" treatments and fuels reduction treatments. "Thinning" done in the wrong way can create hotter dryer forest conditions under current climate conditions which will not improve this forest area. The most recent science does not support the notion that thinning the forest saves them from fire. Catastrophic fires are weather events not fuel load events.
3-Do an analysis of livestock grazing impacts in the project area & how you will address these since the Pine Valley Range Allotment Plan has been stalled at the scoping stage since 2016. That plan noted livestock impacts to portions of Meadow Creek & Little Elk Creek which you have identified as areas needing "riparian restoration." This Clarks project area is heavily impacted by livestock which create dry, dusty, denuded areas & damage to streams.
4-Please address closing old logging roads & user created roads since these lead to erosion & invasive plants being introduced into the forest. Analyze accomplishing the project goals without creating any new or temporary roads.
5-With the Federal emphasis on combating climate change and the 30x30 initiative do an analysis of how this project honors those initiatives since I don't see how it would. This analysis should include all of the carbon impacts of machinery, fuels, vehicles, etc. used in the logging process.
6-Do an analysis that includes not cutting down trees that are greater than 21 inches dbh. These larger trees store more carbon & provide shade & a moister environment for other plants, animals, & riparian areas.
7-Since we don't know where fires are going to happen analyze the impact of the loss of trees due to fires happening outside the "treatment" areas & then trees also being taken out by the project.
8-Do an analysis of impacts to the hydrologic cycle of the project. Collect baseline data before the project proceeds in order to do a proper analysis & to be able to monitor the impacts of the project. Quantity, turbidity, temperature, and stream morphology are just a few of the factors for which baseline data should be collected.
9- Your "old growth" treatments seem to mean removal of grand fir from these areas. Grand fir are part of mature & old growth forest stands. I would not consider logging in old growth forests as a form of restoration. Analyze leaving these areas unlogged but maybe treating with prescribed burning instead.
10- Regarding fuels reduction treatments- These should only be done near private property, structures or roads since we can't thin the forests to save them. The studies are out that thinning forests, especially in an industrial manner, does not keep forest fires from spreading. Hot, dry, windy weather is the driver of fires. And fires are part of the healthy natural cycle of these forests.

Thank you for considering my comments.