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Comments:
The following comments are based on studying the scoping map and reading the project descriptions in the "Need and Proposed Action.pdf." This proposed action covers miles of very varied terrain, elevation, and habitat. There is no information detailed in the proposal as to how various ecosystems will be treated, except to say, "Ultimately the best tool (commercial, non-commercial, mechanical, hand treatment, Rx fire, etc.) to accomplish the needed fuels reduction treatment proposed would be decided on the ground by specialists as they are implementing this project." There are not, for example, even any guaranteeing proper treatment standards for the riparian areas along the streams crossing the proposed treatment area. This lack of information makes it practically impossible to give meaningful specific comments, beyond saying that such information needs to be included for serious public input, and before project implementation. We, the public, are left to simply hope that the "specialists" will include wildlife and fishery experts and botanists with some expertise in our native plant species and not all be fire and timber trained.

Given the above lack of detail, the following are my general comments.

The mapped boundaries of the fuel break areas seem to stretch beyond the breaking point the USFS's own criteria for WUI fire reduction projects; see https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsbdev3_053107.pdf. Both in terms of distance from the mapped resources to be protected and in the inclusion of areas that clearly do not fit the given definitions of an "at risk community," these project boundaries need to be redrawn or clearly explained and justified as allowable exceptions to established rules and definitions. An isolated dwelling unit, even with adjacent structures, is not a community.

Although commercial logging is not listed in Table#1 as a treatment option, it is men toned as a project option in the text. This is confusing. The default treatment for all areas should be Non-Commercial hand thinning, as this is the least invasive and, as is noted, best for "mitigation of resource concerns." Mechanical and commercial logging treatment would only be the considered where no such "resource concerns" of any kind exist. Such concerns should include wildlife habitat, riparian zone impacts, and protection of carbon sequestering established old growth. Research clearly indicates that young trees emit carbon while mature ones take it in and store it long term-longer term than timber products whose harvesting is also a major carbon emitting source.

Current research also suggests that increasing heat, aridity and more frequent extreme wind events make open areas, like those depicted in your graphic illustration of the "Completed Fuel Break," higher fire risk zones, especially after typical commercial logging treatment that tends to replace native vegetation with invasives grass and weed species. There is well documented evidence that such invasive weed fields carry fire twice as fast as undisturbed native understory habitats which retain soil moisture. Research indicates that in our current and projected climate cycles, windbreaks and fuel treatments that do not compact soils, thereby reducing reduce soil moisture retention, may be more important fire risk reduction factors that could outweigh traditional concerns about crown fire. Science is telling us your given description, "Overstory tree retention would be variable but largely only scattered trees would remain in the overstory," may well be a recipe for increased fire risk in our present climate regime. This same current climate shift means that both flora and fauna are going already to be greatly stressed and the kind of area wide disturbance that this proposal allows will only exacerbate this stress with no guaranteed risk reduction.

Research over the last decade has made clear that the most important fire risk reduction depends on fuels treatment within 100-200 feet of the resource to be protected. The 1,000 foot width proposed here makes no

sense in the light of this research and essentially is a license for landscape wide logging in switchback road areas to no honest fire risk reducing result. There is no data given in the document about the efficacy of whatever fuel break design might be chosen, how it will affect other resources immediately and over time, or how it will be maintained for long term fire risk reduction.

Given the high percentage of this project area that was burned in 2000, very particular protections should be given to any surviving mature or old growth habitat and trees. These represent a vital natural resource for long term regeneration and seed supply and their protection should be a priority over all other considerations.

Thank you for your time and attention to the above.