

Data Submitted (UTC 11): 3/2/2024 10:07:35 PM

First name: Peter

Last name: Leusch

Organization:

Title:

Comments: Thanks for the opportunity to comment,

As someone who has a view of Katka from the Montana side, I was able to watch the fire in 2022 and was impressed with the efforts of the fire crews. Weather played a big factor and most of the fires that year were able to burn in an effective way. While I was concerned for the homeowners below the peak as the fire spread downhill, the aerial crews were able to control it. Your plans for the Katkee fuels project seem as if they will only make the problem worse and I encourage you to abandon the project immediately. I have hiked in this area a number of times and always noticed how much more fuel was in previously logged areas than in those that have not been logged. Regen. harvest is just a nice name for clear cutting and your efforts will only dry out the forest quicker and produce more fuels in the near future.

This project will lead to more ecosystem fragmentation, increased exposure to invasive species, exposed soils leading to soil desiccation, water and air pollution, and loss of wildlife habitat. Protecting towns from wildfire requires more than cutting the surrounding forest. Using fire-savvy construction: ignition-resistant building materials, non-ember-trapping ventilation systems, and defensible space around structures are all more effective means of protection.

I encourage you to recognize fire as a natural process that operates as an integral part of the ecosystem in which it occurs. Wildfires are a part of nature and play a key role in shaping ecosystems by serving as an agent of renewal and change.

To comply with Executive Order 14072, mature and old growth trees within the Katkee Fuels Project WUI should be left standing. Large trees and forest ecosystems store massive amounts of carbon and are a major driver of carbon cycle dynamics in forests. Standing mature and old growth play a pivotal role in mitigating atmospheric carbon dioxide levels. Mature and old growth sequestration of carbon addresses the driving force behind increased uncharacteristic wildfire by addressing its root cause-Climate Change.

Given the urgency of keeping additional carbon out of the atmosphere and continuing carbon bioaccumulation from the atmosphere to protect the climate system, we must continue protecting ecosystems with large trees for their carbon stores, biodiversity, proven resistance to drought and fire, and their microclimate buffering ability under future climate scenarios. Our forests are our best large-scale, natural, low-cost carbon sequestering climate solution. Standing forests provide clean water, clean air, wildlife habitat, biodiversity and myriad recreation opportunities.

Warming due to climate change is harming wildlife and is especially difficult for birds, who need shade, cool water, and breezes to cool down. A new study suggests some bird species can get relief from climate change from old-growth forests and forests that have old-growth characteristics due to the forests being cooler during the breeding season and more biologically diverse, increasing food availability. In the Pacific Northwest, plummeting bird population sizes are highest in species reliant on mature stands, and population failures are compounded by the negative effect of clearcutting. Impacts to these bird species must be evaluated.

Since I find it unlikely that you will abandon the project I will recommend:

* An evaluation of timber harvest strategies proposed in the Katkee Fuels Project to ensure that treatment proposals take into consideration all sensitive species present. This evaluation should consider Best Available Science and additions to use of RHCAs (Riparian Habitat Conservation Areas) in addressing movement corridors

for aquatic-dependent terrestrial species.

* An evaluation of timber harvest strategies proposed in the Katkee Fuels Project to ensure retention of mature and old growth forest and trees.

* Adherence to the 2015 Forest Plan related to 40+ acre forest openings in the project area.

* Conducting an old growth forest inventory map and data set within the Katkee Fuels Project boundary and exclusion of these units from any treatment plan that will not retain mature and old growth trees.

* Minimal use of Clearcut, Clearcut w/Reserves, and Shelterwood w/Reserves treatments.

* No Clearcuts, Clearcut w/Reserves, and Shelterwood w/Reserves treatments near open roads.

* Work with private landowners to co-manage private lands within the Congressionally defined WUI.

* Retention of organic matter during activities to limit long-term impacts to soils and the mycorrhizal network.

* Intentional corridor connectivity between "skips" allowing free and concealed movement of both predator and prey species.

* Reforestation of all temporary access/staging/log-deck locations.

* Completion of a sediment and stability report for tributaries within the project area.

* Completion of a water yield analysis.

thanks,

Peter Leusch