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Comments: I am concerned about the scale of steep slope logging in this project. I am concerned about the high cost of this type of logging and even more concerned about its effectiveness regarding wildfire mitigation. I found this research article in Forest Ecology titled:

"Landscape-scale fuel treatment effectiveness: lessons learned from wildland fire case studies in forests of the western United States and Great Lakes region."

<https://fireecology.springeropen.com/articles/10.1186/s42408-022-00159-y>

"Fuel treatments on steep slopes were less effective in changing fire behavior or reducing fire severity than those on flatter ground, especially under high wind conditions (Harbert et al. 2007; Murphy et al. 2007). One case study (Henson 2007) found that areas previously treated with thinning and prescribed fire successfully slowed fire as it was backing downhill but did not impede rapid uphill runs. Fuel treatments strategically located along ridge tops, in which fuel reduction impacts coincide with topography-related reductions in the rate of spread, were considered particularly useful in facilitating fire suppression efforts (Harbert et al. 2007; Murphy et al. 2010) or reducing the probability that past fires reburned (Gray & Prichard 2015)."

I ask that you provide research and modeling that shows steep slope logging is effective at fire mitigation. I agree that it could help in fires backing downslope, but the value is very little in upslope fire on slopes greater than 45%. Fires go up and down slopes, that's how it works. Are you really going to be conducting fire suppression efforts in the steep terrain within the project area? My guess is that you will be using the major existing roads for fire suppression activities. The steep slope logging does not appear to be worth the significant expense. Instead, you should focus on pretreating roads and ridges where fires could eventually be contained. That makes much more sense to me.

Also, please explain how you are able to utilize existing roads within a roadless area. Is this permitted under current regulation?