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Comments: Dear Supervisors Edwards and Gould,

Large scale prescribed burns so far from any significant population centers cause habitat and wildlife connectivity disruption, drying of vegetation and soils, soil erosion, invasive plant intrusion, poor air quality, carbon emission and more. As you can see, burns are not a good idea unless they are small and targeted next to large residential populations. Burned areas even accelerate wildfires that come across these areas. Please don't spend our taxpayer dollars on this harmful activity.

Home hardening, pruning, and creating 100 feet of defensible space along with providing information to homeowners about simple steps they can take to make their homes more fireproof is a worthwhile expense, though. The best way to protect homes and lives is to concentrate attention and resources on communities using proven methods to make them fire safe. Wildfire evacuation plans should already be in place.

Alternative A, Pretreatment Tools (burn preparation) states there will be "thinning operations. How will small trees be removed without damaging the habitat? Snags provide habitat for many bird species. Snags and downed logs are essential in supporting new forest growth. Managed wildfire, prescribed fire and cultural burning should not require tree removal.

This proposal looks like a means for logging old and mature growth trees in our National Forest. To make thinning operations economically attractive to logging companies, commercial logging of larger, more fire-resistant trees often occurs. Mechanical thinning results in a substantial net loss of forest carbon storage, and a net increase in carbon emissions. The destruction to the ecosystem is immense. Mechanical (heavy equipment) treatments will create a great disturbance to the forest floor by crushing seedlings while compacting the soil and creating debris runoff that degrades water quality. Temporary roads to support mechanical thinning will add to the ecosystem degradation by further compacting soils and creating runoff with restoration insufficient to correct the damage. Mechanical thinning kills more trees than it prevents from being killed in mature and old growth forests.

As with prescribed burns, thinning opens up the forest canopy to solar radiation, drying out the understory. It also allows in more sunlight for surface fuels to grow and reduces the wind break created by the canopy. Lower-biomass forests resulting from thinning and other logging activities have hotter, drier, and windier microclimates resulting in higher fire intensity. A mature closed stand of trees with a full canopy will create a micro climate in the understory that is much cooler. The ground is much more shaded keeping the temperature cooler and the understory moist with very little breeze.

This alternative proposes mechanical thinning should not be considered without an Environmental Impact Statement. An EIS must be prepared given the highly controversial and uncertain nature of this project. The stated primary purpose of this project is to reduce the risk of wildfires and promote safe fire-suppression activities but there is scientific evidence showing that thinning will not achieve this purpose. Adverse impacts to Spotted Owls and the increased tree mortality caused by thinning should also be addressed in an EIS. Implementation Tools and Prescribed Fire Techniques provide additional concerns. Aerial ignitions by helicopters or by drones indicate that these burns will be in very remote areas in the National Forest, far from any population centers. This is a dangerous and not easily controlled method. How many of these prescribed burns have become out-of-control?

Please give serious consideration to Alternative C (Wilderness Exclusion Alternative) while modifying it to not only drop Wilderness areas from the proposal but to conduct burning operations without prior tree removal or mastication outside of Wilderness. One of the benefits of Wilderness is the ability to study the impacts of climate

change on an area that has not been significantly altered by man. Fires have been allowed to burn in Wilderness areas with no serious consequences.

The agency should instead allow natural occurring, lightening caused fires to play its ecological role in Wilderness. The Forest Service proposal represents a huge human-driven manipulation of Wilderness that is inconsistent with the letter and spirit of the 1964 Wilderness Act. Furthermore, the cutting down and removal of undesirable trees or the reforestation efforts of planting seedlings run counter to the Wilderness Act as well. Wilderness needs to be left unaltered to enable scientists to study the effects of climate change in these natural areas. These wilderness areas carry the highest level of protection to preserve their natural state. Please do not set a precedent by bypassing these protections because once lost, they will never be regained.