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First name: Ron

Last name: Smith

Organization:

Title:

Comments: We appreciate the apparent intent to expand active forest management and elevate the level of timber outputs across much of the NWFP footprint. However, many of the components in the proposed amendment that are designed to enable more active forest management will not be effective if the agency does not address the Survey & Manage standards.

Survey & Manage was designed to provide protection for over 300 species that were believed to be dependent on late successional forests. Given the vast Late Successional Reserve (LSR) network and the proposal to manage an additional 1.3 million acres of mature and old growth forest on Matrix land identically to LSR, these Survey & Manage standards are now obsolete. In fact, adhering to these standards for many species results in vast acreage being "off limits" to active management, much of it on dry fire-prone forests. Due to these fire risks and the inability to mitigate them through active forest management, the Survey & Manage standards are harming the very species it aimed to protect. The Forest Service must remove the Survey & Manage Standards and Guidelines through this amendment.

\*Despite the clear intent to expand active management and timber harvest on all stands identified as Dry Forest across all LUAs, it must be noted that the proposed desired condition will likely inhibit sustainable timber production in the long term on these lands.

That proposed desired condition calls for the presence of large, old trees and the absence of small, young trees in areas directly surrounding them. Based on review of the DEIS and participation in the public webinars following its release, our understanding is that the directive on all Dry Forests following initial timber harvest is guided by the concept of forest "maintenance" where periodic controlled burns will be applied to maintain the "absence of small, young trees." This approach has merit from a hazardous fuels reduction perspective but will ultimately result in the inability of these forest stands to provide a sustainable supply of timber products in the future.

\*It is refreshing to see the amendment proposing elevated levels of active management on dry forests. These fire prone forests, regardless of their age or origin, must be available to manage to mitigate fire risk. However, simply including new objectives that guide such management is insufficient. Any real progress on such management is incumbent on removing the obstacles to effectively managing hazardous fuels in these dry forests. Those obstacles include Survey & Manage, excessive riparian reserves, and arbitrary age limitations.

\*The use of prescribed fire outside of the fire season is an effective tool for managing hazardous fuels. However, the practice of "managing" wildfires during the fire season is reckless. The proposed amendment includes new objectives that explicitly identify the use of "unplanned" ignitions to attain desired forest conditions across the landscape. This directive is extremely concerning, particularly to those who live and work in communities adjacent to National Forest System land. In this amendment, the Forest Service should explicitly adopt a policy to aggressively suppress all wildfires, regardless of land use allocations, during the wildfire to protect public health, safety, and communities.

\*A predictable and robust supply of timber products is essential to funding county governments. This funding level is not only a function of how much timber is sold, but the value of that timber. The DEIS provides a comparison of treatment acres and timber volume between the status quo and the Amendment: 212,000 acres treated and 4,446 MMBF sold (21,000 MBF/acre), and 735,000 acres treated and 9,700 MMBF sold (13,000 MBF/acre) respectively. So, while the acres treated in the Amendment increase by 247%, the volume sold only

increases by 118%.

This indicates lower volume per acre and, therefore, a diminished monetary value that is critical to maintain rural county services. We urge the Forest Service to revisit these calculations and the assumptions behind their results.

Of all the choices alt D was developed in response to public comments that support "more flexibility" for active forest management. This is the only choice available that would even come close in helping our county funding shortfalls.