

Data Submitted (UTC 11): 3/11/2025 11:37:12 PM

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Comments: I am a retired USFS hydrologist, and I congratulate the Region on producing what appears to me to be a thoroughly well-thought-out set of goals for land management in the next decades. It is great to see tribal coordination become a routine way of planning and implementing management projects. And it is wonderful to see community relationships to forests become important drivers in planning. Thanks for using the results of monitoring and research done in the intervening years as a scientific foundation to guide the amendment. Just a few comments from a rapid review follow.

I have not taken time to review the science documents the amendment is based on, but my observations and understanding of the general trajectory of PNW forests lead me to

1.support the direction to increase thinning and create diverse openings with the goal of expanding old growth/mature forest habitat, among the other goals. However, rather than specifying the age of trees that can be cut, I recommend you couch that in terms of maximum ages. Local staff should be able to write prescriptions that do not cut trees that old, and I am afraid that your specifications will effectively force them to cut older and larger trees, whatever the stand conditions. I realize that is not your intent, but agency history and political realities point that direction.

2.I especially support working with local tribes, although I can imagine their goals will not always align with USFS'.

3.Creating local, reliable timber supplies is also a very worthy goal, but I doubt it will be attainable everywhere all the time, and it should be subservient to the other goals listed in the NOI. The amendment should acknowledge this, and other means of supporting timber-dependent communities should be explored if active management is not required or desirable to meet the other goals when a landscape analysis is undertaken.

4. I also support the idea of bringing back fire, especially to eastside forests, and I understand thinning will be required to make that feasible in many locations. However, I question the idea of thinning riparian areas. The amendment states:

"an estimated 3.5 million acres are within riparian reserves where vegetation management activities may be appropriate to accelerate development of large conifers and conserve old-growth structure consistent with meeting ACS objectives."

I can see why that might be necessary in some locations where dense brush has taken over, but I doubt whether mechanical clearing is a good idea adjacent to streams. Too much potential for soil damage and sediment mobilization and delivery to the stream. I suggest you incorporate some strong caveats about when and why this could be necessary, and how it should be done. How management is done on the ground is as or more important than what is done, sometimes, as I'm sure you recognize.

5.The draft amendment references the advisory committee and several scientific references that helped develop the goals and objectives. However, you should definitely involve foresters with experience on the ground, who have planned, implemented and monitored the results of harvest. They should be a reality check before you finalize the amendment.

6.The amendment calls for project plans to consider climate vulnerability and adaptation, an excellent strategy for dealing with an uncertain future. However, nothing is said specifically about designing the distribution and type of harvest units such that the timing and distribution of runoff are optimized for the location. Given that we expect more rain, earlier snowmelt, lower low flows and more intense floods, I believe we should be designing harvest using every bit of our scientific understanding of how those are affected by large-scale timber harvest. We

should not be contributing to these detrimental changes.

7. I do not agree with establishing specific numbers of projects or acres of 'treatment'. Surely there are other ways of encouraging districts to work toward the goals you identify. I think such targets are too likely to force rangers and supervisors to concoct projects that may or may not be really desirable. It is too reminiscent of the harvest targets we used to be subjected to.

Thank you for considering my comments on this very complex guidance for new directions in regional management. Nice work.