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Comments: I disagree with the proposed change allowing forest management treatments to 80-120 year old moist forest stands as described in Alternative B. Alternative B does not reflect the value that moist mature and old growth stands provide towards the goals of regional sustainability, carbon sequestration, resiliency against wildfire, and protections for federally listed endangered species. Raising the age class of stands that qualify for protection from logging from 80 to 120 years undermines the goals expressed in the EIS. Additionally, the benefits that the DEIS claims Alternative B provides, particularly regarding wildfire resiliency are overstated.

Since the original NWFP in 1994, the total amount of late successional old growth forest has decreased, in contrast to the goal of preservation. The proposition that old growth would be better developed through active management on stands between 80 and 120 years is not supported in the DEIS. These late successional stands are key to the goals described in the NWFP of ecological resiliency and protection for federally listed species. The DEIS does not provide sufficient explanation of how the desired conditions for late successional reserves can be achieved through treatment in stands between 80 and 120 years. Specific limitations on treatment type and severity are needed to ensure that any treatments applied to late successional reserves are truly aligned with the desired outcome. What data exist to show that the current standard of 80 years does not facilitate recovery of federally listed species and restoration of old growth forest conditions?

The claim that substantial thinning and logging in mature moist forests will reduce wildfire risk is flawed. Fire severity is likely reduced by mature moist stands due to a cooler microclimate (Odion, et.al). In contrast, fuels reduction logging can increase the risk of fire as stands are hotter, drier and experience more understory growth. The goal of achieving community resiliency is better served by preserving and prioritizing moist late successional reserves and advocating for the creation of defensible spaces surrounding structures. Additionally, the protection from wildfire given by post salvage logging is overstated in the proposed alternative B. The impacts to watersheds through increased sediment runoff, reductions in wildlife habitat and a slower overall recovery are understated in the proposed alternative. Salvage logging removes habitat for cavity nesting birds post fire (Kotliar et al., n.d.). At a minimum, more stringent guidance should be provided regarding salvage logging to retain a diversity of snag species, size, decay, and density distribution. Particularly for late successional reserves, salvage logging should be prohibited to prioritize natural regeneration.

In summary, the current stand age for forest management activities in LSRs should remain at 80 years and salvage logging should be subject to stringent guidelines or prohibited.

References:

Kotliar, N., Hejl, S., Hutto, R., Saab, V., Melcher, C., & McFadzen, M. (n.d.). Effects of fire and post-fire salvage logging on avian communities in conifer-dominated forests of the Western United States. *Studies in Avian Biology*, 25(25), 49-64. <https://pubs.er.usgs.gov/publication/87277>

Odion, D.C., E.J. Frost, J.R. Strittholt, H. Jiang, D.A. DellaSala and M.A. Moritz. 2004. Patterns of fire severity and forest conditions in the western Klamath Mountains, California. *Conservation Biology* 18(4): 927-936. http://nature.berkeley.edu/moritzlab/docs/Odion_et_al_2004.pdf