

Data Submitted (UTC 11): 3/18/2025 1:20:17 AM

First name: andrew

Last name: van brocklin

Organization:

Title:

Comments: I echo the Coast Range Association's comments, copied below from their document "Coast Range Association Comments-A Fire Resistance and Resilience, Forest Stewardship, and Climate Change":

Section 1:

1. Recognize and incorporate wet and rainforest life zones, coupled with Plant Association Zones and Mean Annual Increment metrics into a revised set of mapped forest types. 2. Recognize, incorporate and celebrate the world class growth and accumulation of forest biomass - including above ground carbon for all moist, wet and rainforest areas. 3. Ecologically account for past forest removal from the SNF and all national forests. 4. Discard the notions of fuel load and industrial wildfire use for wet and rainforest life zones. We support the DEIS approach of not using fuel load reduction, a totally unwarranted strategy, for moist, wet and rainforest zones. 5. Consult relevant tribes for proper fire use in wet and rainforest life zones.

Section 2:

6. We are now at "code red" on planet Earth. Humanity is unequivocally facing a climate emergency. 7. Future climate conditions will likely arrive sooner than the DEIS's climate discussion suggests. 21 8. DEIS Alternative B listed topics are severely remiss addressing wet and rainforest zones: 8.a Forest Stewardship: Fire resistance, not resilience, must be the goal. The DEIS lacks a fire resistance narrative in light of anticipated climate warming. 8.b Fire Resilience: Is appropriate for human communities. Home hardening, not fuel reduction, is the path to human community resilience. 8.c Climate: Is not one among many issues - it is THE issue for Pacific Northwest forest management. 8.d Ecosystem Integrity: Cool, temperate wet and rainforest ecosystem integrity is not supported by commercial timber removal and extensive road networks. 8.e Carbon: World class sequestration of atmospheric CO2 is a natural outcome of proper forest stewardship when managing for wildfire resistance and ecosystem integrity. 9. The DEIS must be seriously revised for wet and rainforest life zones and incorporate wildfire refugia science for wildfire resistant forest management.

Section 3: Key Takeaways:

10. DEIS Alternative B must base forest thinning for wildfire resistance and the retention and build-up of sequestered carbon for wet and rainforest life zones. 11. Forest thinning must keep at least 75% canopy cover and preferably more canopy cover for wildfire and climate impacts. 12. Commercial thinning must be replaced by Forest Service budget funded thinning. 13. Supportive infrastructure for dispersed recreational activities must be part of the DEIS, an issue not discussed in these comments. We will discuss recreation in our comments on social and economic issues. 14. We applaud the Forest Service for maintaining Late Successional Reserve areas. However, we strenuously oppose future commercial timber harvest as a management practice in LSRs. Option B's proposal to harvest stands in LSRs up to 119 years of age is a dead-in-the-water idea and wrong forest management. Removing trees from previously unmanaged stands is even more egregious. 26

Thank you,

Andrew Van Brocklin