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Organization:

Title:

Comments: 1. This proposed action is very short on detail. I recognize this is still the scoping process, but there's not much to go on, from an outside viewpoint, and on which to comment.

2. I like the concept, i.e. of forest management that appears to have forest health in mind. Whether that's what's actually happening I can't tell, but the "skips and gaps" method is not something I've ever heard of before. But with the first stated need being "(1) Providing a sustainable timber supply to support local economies,..." it appears that commercial aspects will take precedent over forest health and ecological aspects. Please address how the decision process will weigh economic and timber supply aspects compared with ecological, water quality, and forest health aspects, particularly where the creation of "gaps" is concerned.

3. Relative to forest health, one of the big challenges I see across the forest landscapes these days are dead and/or downed wood, i.e. fuel for future catastrophic forest fires. Much of this fuel is from diseases, drought, windstorms, and other causes. It seems like a project like that described, with the stated Purpose and Need that includes "...(2) Reducing wildfire risk through strategic thinning and shaded fuel breaks, (3) Improving forest health and resilience by enhancing forest structure, species diversity, and stand density," should also be looking at fuel reduction such as removing downed wood or diseased / dying trees. What would the approach be to handle these aspects, and would the "skips and gaps" be designed with those issues in mind? Will there be any additional fuel reduction in areas not designated as "gaps"? What will happen to fuels that are identified and are to be removed within the "gaps" - will there be slash burning or will all of the fuels be removed from the sites?

4. Please address how the proposed action will affect water quality in the tributaries within the project area, specifically Lost Creek, Scott Creek, Boulder Creek, Olallie Creek, and Anderson Creek. Include (a) whether it will cause changes (either increases or decreases) in water temperature, suspended sediment, dissolved inorganic nitrogen including especially nitrate-nitrogen, total nitrogen, total and dissolved phosphorus, and total and dissolved organic carbon, (b) both short term and long term effects, and (c) effects on receiving waters, especially the McKenzie River. In such analysis, consider that the McKenzie River is particularly sensitive to dissolved nutrient inputs, though those effects may not be visible in terms of enhanced benthic algal growths until much further downstream (e.g. below Blue River, Vida, or even Leaburg) due to temperature limitations on algal growth in those upper reaches. In your analysis of water quality impacts, please make reference to existing Total Maximum Daily Loads in the McKenzie River, as defined by Oregon Dept of Environmental Quality, and discuss how those proposed action will affect compliance with these TMDLS.