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First name: Sheila

Last name: Strachan

Organization:

Title:

Comments: It is well known that timber harvest standards and practices on Oregon State Forest Lands differ substantially from those same standards and practices on federal Forest Lands - especially those lands covered by the NW Forest Plan. Please describe in detail how the GNA how these differences will be managed throughout the project.

In light of projected shortfalls in State and Federal budgets, please evaluate the feasibility of the project to be sufficiently staffed over the project timeline in order to ensure that the project is implemented as prescribed.

The project should adhere to the NEPA process, ensure the process is transparent and that the public is involved throughout.

Please include an implementation monitoring plan to ensure that National Forest NW Forest Plan, Riparian Reserves, Late Successional Forests, Clean Water Act, Endangered Species Act, the National Forest Management Act, Forest Service Manual and all other rules, standards and conditions of timber harvest practices on Federal lands are included in the GNA and that staff implementing the proposed action are well versed in the application of these standards on the ground.

Please disclose the direct, indirect and cumulative effects of the project on Sensitive, Threatened and Endangered Species.

Please evaluate the direct, indirect and cumulative effects of the proposed action on large diameter trees, forest complexity, old growth forest characteristics and landscape complexity. Please use the EA to define the largest diameter trees that will be considered for removal.

The project should focus on young, second growth stands and avoid older forests.

Please evaluate how the project will comply with USFS standards for limiting ground disturbing activities over the project area.

Please use the EA to describe in specific terms how the project will affect large woody debris and snag retention across the landscape.

Please document where new road construction or reconstruction will occur and what the standards for construction will be. Temporary roads and road reconstruction should be minimized in the project area.

Please document the use of the most recent science, specific to Western Cascade Forests in the Douglas Fir region, to develop the landscape level wildfire risk reduction plan. Using science-based metrics, please document how the proposed action will affect fire resilience of the landscape over time.