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Comments: I am completely opposed to the Northern Escarpment Ecological Restoration and Fire Resilience #67318 project as it will degrade ecological quality and increase the risk of wildfires.

"Degraded forests are at a much higher risk of emitting carbon and reaching tipping points that increase with climate change effects, such as severe drought and wildfire, compared to forests undisturbed by industrial impacts (Lindenmayer et al., 2011)." Introduction

DellaSala et al., 2025, "Measuring forest degradation via ecological-integrity indicators at multiple spatial scales" <https://www.sciencedirect.com/science/article/abs/pii/S0006320724005019>

"Active management may also increase the risk of high-severity wildfire by creating drier conditions that shift fuel types and fuel distributions, increasing fine fuels that dry quickly, while over-ventilating forests from the unravelling of intact canopies that otherwise buffer forests from high wind speeds associated with fast moving flames.

Similarly, the construction of roads and firebreaks (chronic and cumulative disturbances) fragment landscapes and wildlife populations, paving the way for invasive species and increasing the risk of human-caused ignitions (such as arson or accidental burns).

An additional problem with active management is that tree removal or retention based on forestry prescriptions, particularly old growth or young trees establishing after disturbance, may reduce adaptation potential that would otherwise occur via natural selection that favors surviving trees better suited to the novel disturbance regimes resulting from climate change and insect outbreaks."

Active Management Harms Forests - DellaSala

<https://www.theinvadingsea.com/2025/06/06/active-management-forests-trump-executive-orders-thinning-logging-climate-change-wildfires/>

Severe weather and intensive forest management increase severity in a multi-ownership landscape

Harold S. J. Zald ?, Christopher J. Dunn

First published: 26 April 2018 | <https://doi.org/10.1002/eap.1710> | Citations: 128

The most recent and comprehensive research from U.S. government scientists, university scientists, and scientists from non-governmental organizations finds that denser and more carbon-rich forests act as a climate buffer, creating a cooler, shadier, more humid microclimate, which results in overall lower wildfire intensity, while removing trees substantially increases the rate of wildfire spread and leaves towns with less time to safely evacuate, kills significantly more trees than it prevents from being killed by natural processes, and dramatically increases carbon emissions per acre relative to wildfire alone.