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Comments: Is the "mosaic" of forest, grasslands and woody draws an arbitrary or natural condition? Are the reduced tree densities, clumps and gaps an arbitrary or natural condition? I would not generally agree with any project creating arbitrary landscapes for the achievement of some objective.

If our past fire suppression is the cause of the decline of grassland communities and other tree species habitats, then I would agree that those ecosystems need to be restored to their historic conditions. If not, then we should let nature take its course.

The problem with commercial timber harvest is that this is not a time to be removing trees. Trees and other vegetation help with climate mitigation. From this point forward we should be planting more trees, not removing them.

Regarding fuel treatments, we have to ask if they're necessary. On average there is a 1% chance that any part of the landscape will burn in any given year. So it is entirely possible that a treated area will not burn in 50 or even 100 years. If that happens, the fuel treatment was a waste of time. There would be no effect on firefighter and public safety, and no change in wildfire suppression effectiveness. Moreover, we would be deprived of the climate mitigation that vegetation could have provided for 50 or 100 years.

If the fuel treatment removes vegetation other than trees, that vegetation will grow back more quickly. Therefore, that type of treatment would have to be done more often. The chance of that part of the landscape burning in that shorter time period is much less. So is this kind of treatment another waste of time and effort?

Regarding resilience to natural disturbances, research has shown that natural disturbances such as fire, insects and disease reset forest succession and create diverse habitats. Other research shows that mature and old-growth forests are superior to younger forests for mitigating the climate and biodiversity crises. Large old trees are the most resilient to wildfire. Isn't this the resilience you want in a forest?

Research has long ago established that in the forest that grows from a clearcut, trees grow more slowly and are less hardy. This is because they are missing the nutrients that would have been provided by the trees that were removed. This is counterproductive to resilience. Should we be clearcutting, or even thinning?

Roadless forest areas that have experienced multiple fires are recovering from their overstocked condition, and are less likely to experience stand replacing fires. So it is better to allow these areas to adapt back to a natural fire regime.

Based on the research of the Dominic DellaSala and other scientists, I am not convinced that reducing fuel loads will enhance fire suppression capabilities, or that you will be able to reduce fire intensities. Their work shows that the most managed lands have the highest intensity fires. Fires in logged areas tend to burn at higher intensity than fires in wilderness, national parks, and roadless areas. Fires driven by wind can go through, over and around any fuel treatments.

Increased fuel is not the problem. Wildfires are driven by drought, low humidity, high temperature, and most importantly wind. Fire severity has been correlated with increasing aridity caused by climate change. All of these factors have increased in recent decades. I hope you are not laboring under any illusions.

The Draft EA states that temporary roads would be obliterated and restored when no longer needed for commercial harvest, but how long will that be? The lifetime of the roads should be stated and considered, because roads increase the spread of weeds, impact water quality, and disturb sensitive wildlife by fragmenting habitat and impeding their movement.

Building more roads also leads to more fires, because 85% of fires are human caused, and are started within a few hundred meters of roads. Less than 3% of all wildfires start in wilderness or backcountry areas that are more than 2 km from a road.

Have you considered the carbon footprint of this project? Research has shown that fuel treatments and logging for the purposes of wildfire mitigation and timber production actually produce far more emissions than wildfires would. Also, since the bulk of carbon stored in trees remains after a fire, logging before and after fires results in far more carbon released to the atmosphere than from the fire itself.

Emissions from fuel treatments and logging are contributing to the likelihood of more severe drought and fires. We need to question whether it is right to continue actions that contribute more to the problem. Perhaps it is better to store carbon in protected forests, instead of adding more emissions by logging them. Also, it is worth noting that intact forests hold water longer, which is important in drought conditions.

The Forest Service has been guilty of overestimating the number of acres they think should receive fuel treatment in WUIs. In their analysis of previous WUI wildfires, they have overestimated the amount of forest involved in the blazes, and underestimated the role of fire spread from structure to structure. This needs to be taken into consideration.

The majority of urban home destruction by wildfires is the result of grass or shrub fires, not forest fires. How will this project help with that reality? It is time to realize this is a fire management problem not a forest management problem. So a fire management solution is needed. The Forest Service can contribute in an advisory role to address the risk to development in the WUI, but local governments and homeowners should be managing that component of the wildfire risk they are taking on when they choose to allow development in a WUI. An ounce of prevention saves a pound of cure. In the absence of prevention of development in a WUI, mitigation efforts should be focused outward from the home, not inward to the forest.

I fully support the removal of non-native species.

Thank you for your time.