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First name: Jerry

Last name: DiMarco

Organization:

Title:

Comments: I do not appreciate that we have only 1 opportunity to comment on this project, and that it is for a Preliminary Effects Document instead of the EA. Section 40807 of the Infrastructure Investment and Jobs Act states that an emergency situation requires immediate implementation of authorized emergency actions. Given that there will be new roads constructed as a part of this project, how likely is it that the project will be completed this year or even next year? In the Group Selection section, it describes a treatment that will consist of 3 commercial entries spaced approximately 30 years apart. By what measure would that be considered immediate? I question the designation of an emergency situation for this project, especially since the likelihood of a fire in the project area is so low in any given year.

The negative impacts of wildfire suppression are well known. 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.

Research from long ago has already established that in a 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. So should we be clearcutting, or even thinning?

Regarding fuel treatments, we have to ask if they are 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?

The Document states that temporary roads would be decommissioned to the state existing prior to implementation, but how long would that be? The lifetime of the roads should be stated and considered, because closing them to motorized traffic still allows biking, hiking, horse riding, and perhaps other means of transportation. So these roads would still spread weeds, impact water quality, and disturb sensitive wildlife.

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.

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

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?

Based on the research of 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 majority of urban home destruction by wildfires is the result of grass or shrub fires, not forest fires. The situation may be different in Jardine, but are you sure this project will help prevent the destruction of homes? 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.

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.

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 initiate or 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.

If our fire suppression efforts have caused conifer encroachment into historically wet meadows, streamside riparian areas and whitebark pine stands, 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, because those trees are needed to mitigate climate change, and to provide nutrients for the next generation of trees.

Thank you for your time.