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Comments: Thank you for putting some good, pertinent information in the preliminary EA. I especially appreciate the history of timber sales in the project area and also the structural stage information.

I will start off by requesting that you consider replacing shelterwood removal, and in its place, utilize single tree selection. Let's be clear here, removing the overstory off of these stands will do nothing to reduce fire risk nor will it reduce the risk of insects (mountain pine beetle). These overstory trees are already well spaced with no risk of crown fire and are easily the most fire-resistant trees out there in those stands. Because of this, it really calls into question whether this project (or at least this part of it) is really addressing any kind of emergency situation. By using uneven-aged management, you will be using a more natural way to manage ponderosa pine instead of the knee jerk reaction of always using even-aged management.

The structural stage objective for 3A is 10%. MA 5.1 within the project area is 20%, yet you will be increasing it to 39%! Four times the objective percentage! This is incredible! You justify it by stating that at some point down the road, some of it will transition to 3B and 4B. Really? How much and how long will this take? Since these are just objectives, you technically do not have to follow them, but what you must do is fully justify your actions in the EA or EIS. You have not come close to doing that. Do not say that you are reducing fire and insect risk, because as I stated in the first paragraph, the shelterwood removal is not accomplishing either.

Your BE and narrative in the EA both disclose that timber harvesting has had a serious negative effect on the Goshawk. In the BE, it states "may adversely impact individuals, but not likely to result in a loss of viability in the Planning area, nor cause a trend toward federal listing." I'm not sure how you can reach this determination when have made a pretty good case on the negative effects of over logging on the Goshawk on the Forest and in the planning area. In fact, it appears that you have almost extirpated the Goshawk from the Northern Hills Ranger District.

This project will create hundreds of slash piles. If past is prologue, many of these piles will be there for years. Let's be clear, they pose a significant fire risk as evidenced by the recent Qury Fire. I suggest that you stop collecting BD funds from the purchaser and require them to dispose of the slash. I know you don't want them burning the piles because there is no reason to believe they would do well at that, so they could chip the slash and haul it off somewhere. It's their slash, let them deal with it. The current system is clearly not working.

This project area has been heavily logged over the last 25 years. It largely needs a break from commercial logging. Perhaps there are some areas that genuinely need thinning; however, the areas identified for thinning that I saw were questionable at best. I support the planned prescribed burning but please be realistic as to how much of this will actually be accomplished. I also fully support the planned pre-commercial thinning, but I also realize this is dependent upon funding.

I understand you are in a difficult situation with a lot of pressure to sell more timber. Just think carefully about this project, particularly the shelterwood removal. Do something that you can look back on and be proud of. Thanks for your consideration.

Please review this research paper. It shows that the fire risk is from surface fuels and small trees.

<https://research.fs.usda.gov/download/treesearch/80565.pdf>