

Dear BLM,

Please thoroughly consider this comment on the proposed Aloha Trout Forest Management Project.

This project would log and build roads through up to 1,279 acres of public forests in Oregon's Coast Range- habitat for federally protected imperiled species including marbled murrelet, northern spotted owl, and coastal coho salmon at risk.

Thank you for reducing the original proposed project size. Of the proposed alternatives, Sub Alternative 3a is my preferred choice, as it the least harmful because it would only conduct commercial thinning without new road construction. However, I still have concerns and recommendations for the BLM.

I am concerned that logging and road building will increase fire risk for this area, which is frequented by community members for educational and recreational purposes including mushrooming, hiking, and birding. Also that logging near creeks-including Honey Grove and Seeley Creeks- will introduce sediment, and greatly reduce shade- increasing stream temperatures when fish need cool, clean water.

- Under all alternatives, please limit steep slope operations, consider shifting methods from ground based to cable yarding, and implement wet weather hauling restrictions to reduce sediment delivery to streams and improve safety for operators and the community.
- BLM should utilize existing roads and decommission roads where possible.

The entire Aloha Trout project area is frequented by community members. Students often visit Seely Creek, the headwaters of which would be impacted, and visit nearby Clemens Park to study the water quality of the Alsea River and its tributaries. Logging and road building put forested watersheds at great risk by disturbing soils, adding sediment to streams, increasing fire risk, introducing invasive weeds, and damaging habitat for imperiled fish and wildlife species.

- BLM should conduct direct outreach with community members and the public regarding any logging and associated activities.
- Signage should be posted physically and digitally with advance notice adequate to notify when any logging, road building, or other associated activities are to occur.
- A visual buffer of at least 50 feet surrounding the user created trails in the project area should be adopted.

Please also consider the project's climate and carbon impacts, and the many published peer-reviewed scientific studies available (not financed by the timber industry itself). This project includes areas of older forest and legacy trees, serving as important habitat and carbon sinks. Coast Range forests are some of the most carbon-dense in the world, with the potential to

sequester and store more carbon on an ongoing basis than almost any other ecosystem. Even if legacy trees are left, those isolated individual trees no longer have protected microclimates that provide habitat for older forest dependent species. Legacy trees frequently blow down in storms (as do many remaining stream buffer trees), following the removal of surrounding trees, after loss of root and soil systems and wind protections.

In our beloved PNW, we are experiencing more extreme weather patterns, dryer conditions, less abundant aquifers and water tables, and prolonged periods of drought. These factors already increase fire risk to nearby communities. When the moist canopy in these natural mature forests are cut down, it only amplifies these factors.

The BLM states in the draft EA that regeneration harvest activities would increase fire risk for at least the next 20 years- yet still issues a FONSI. The surrounding private lands were clearcut in the last decade- already increasing fire risk and undermining the health and stability of the ecosystem as a whole. As we all know by the many studies released, most wildfires start near roads, by humans. More roads could be devastating to the local communities!

I ask the agency to analyze increased risk of major landslides, similar to what has recently occurred in the Coast Range during atmospheric river events- the Siletz Hwy 229, originating from a Weyerhaeuser tree farm. Due to the cumulative impacts of nearby clearcuts, the agency should move forward ONLY with commercial thinning in this project- if any logging is authorized- and no new roads.

- Please re-evaluate the true full range of environmental (and community) impacts associated with machine logging and road building in this highly visited and cherished landscape.
- Develop an alternative that protects an abundant watershed, recreational opportunities, connected fish and wildlife habitat, fire resilience, and continued carbon sequestration.
- Truly Incorporate community feedback into project planning efforts and prioritize forest values beyond timber production.
- Lastly, take into consideration that more of our public lands are at serious risk right now- and we must maintain all that we can, while we still can.

Thank you,