



Wednesday, May 11, 2022

Jennifer Eberlien
Regional Forester
Pacific Southwest Regional Office
Ecosystem Planning
1323 Club Drive
Vallejo, CA 94592

RE: Region 5 Post Disturbance Hazardous Tree Management Project Draft EA

These are Environmental Analysis comments for the Region 5 (R5) Post Disturbance hazard tree logging project. We are commenting on all regions included in the proposal and specifically the Sierra National Forest.

Dear Regional Forester Eberlien:

We request that the Forest Service halt its plans to fast-track post-fire salvage logging and short-cut the environmental review process, across millions of acres of National Forest in California's Region 5. This region includes nearly all of California's National Forests, totaling more than 20 million acres. The Region 5 Post Disturbance Hazardous Tree Management Project is essentially the largest timber sale in modern history, and it would allow the Forest Service to log fire affected trees without a limit on the size or age of trees logged, via "salvage logging." The scale of the logging project is massive; it includes 5,780 miles of roads (more than twice the distance across America). It will inhibit forest recovery and increase the likelihood of mega-fires across nearly all the forests of California. Notably, it excludes the necessary and comprehensive environmental review.

While the USFS claims that logging is necessary to keep roads safe for public access, 81 percent of the roads slated for logging are poorly maintained and rarely used maintenance level 2 roads, which are logging spurs not intended for frequent and regular travel. Many of these roads are dead-end routes, simply used to facilitate logging across the forest ecosystem.

In the [letter dated, October 25, 2021](#), the Forest Service detailed its plans to allow post-fire logging on this unprecedented scale, with limited public input and limited environmental review. The Forest Service is doing "Environmental Assessments," (rather than a full environmental impact report and statement) one for each of three zones in the following National Forests:

- The north region includes Klamath, Mendocino, Shasta-Trinity, and Six Rivers National Forests.
- The central includes Lassen and Plumas National Forests.
- The southern region includes Inyo, Sequoia and Sierra National forests.

For an environmental assessment to be performed, the foregone conclusion is that these projects will have no significant environmental impact, yet the proposed maps show millions of acres and hundreds of miles of roads subject to post-fire salvage logging. Post-fire logging is one of the most damaging USFS activities performed on forest ecosystems, and this fact has been well established by peer-reviewed research dating back two decades. Post-fire logging disrupts ecological processes¹, threatens wildlife habitat, compacts soils, damages riparian corridors, spreads invasive species, and causes erosion, which degrades water quality. It also inhibits forest regeneration and increases fire risk² to communities already threatened by wildfires, an extended wildfire season, and climate change.

Under hazard tree rules, there is no limit on the size of trees logged, whether living or dead, and therefore, old growth trees and snags are vulnerable to logging under this proposal. While large, old-growth trees comprise fewer than 2% of the individual trees in a forest, they can account for nearly half of the total forest biomass³. As such, they anchor the resilience of a forest and help protect it against fire, by blocking high winds, shading the soil, retaining moisture, and lowering surface temperatures.^{4,5} The USFS also plans to log 300 feet from existing roads, a non-standard distance, which will cover much of post-fire landscape.

In particular, in the Sierra National Forest, the USFS proposes hazard tree logging on roads and [also in wilderness areas and trails](#), which will harm pristine and beautiful areas and old growth forest ecosystems. If such plans are enacted, they could devastate the area, prevent forest regeneration, damage wildlife, permanently scar the land, and set up the next big fire.

On top of that, the Sierra National Forest is already proposing an enormous hazard tree logging project in the footprint of the Creek fire and in the footprint of this Region 5 plan. (The USFS plans to log well over 200,000 acres, with proposed post-fire logging and commercial thinning in the Creek fire area, according to the Forest Service's February 2022 scoping notice.) The regional logging plan covers the same area. This further establishes the need for a full Environmental Impact Statement, so cumulative impacts can be fully evaluated and other options considered.

In a regular iteration of existing NEPA law, small projects from 500 acres to 5000 acres and higher may have a full environmental impact statement, in which the USFS must assess and consider options and the effects of chosen actions, including choosing a “no action alternative.” This enables groups and citizens to comment with an adequate understanding of the projects and their potential damage.

¹ Lindenmayer, D.B., and R.F. Noss. 2006. Salvage Logging, Ecosystem Processes, and Biodiversity Conservation. *Conservation Biology*, 20(4) 949–958.

² Donato DC, Fontaine JB, Campbell JL, Robinson WD, Kauffman JB, Law BE. Post-wildfire logging hinders regeneration and increases fire risk. *Science*. 2006 Jan 20;311(5759):352. doi: 10.1126/science.1122855. Epub 2006 Jan 5. PMID: 16400111.

³ Lutz, J.A., A.J. Larson, M.E. Swanson, J.A. Freund, 2012. Ecological Importance of Large- Diameter Trees in a Temperate Mixed-Conifer Forest. *PLoS ONE* 7(5):e36131.

⁴ Binkley, D., Sisk, T., Chambers, C., Springer, J., Block, W., 2007. The role of old-growth forests in frequent-fire landscapes. *Ecol Soc.* 12, 18.

⁵ Lesmeister, D. B., S. G. Sovern, R. J. Davis, D. M. Bell, M. J. Gregory, and J. C. Vogeler. 2019. Mixed-severity wildfire and habitat of an old-forest obligate. *Ecosphere* 104:e02696.

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On the scale proposed here: entire forests are grouped under one environmental assessment, making an adequate analysis by the agency and a full response from the public an impossibility. No other options will be considered, and the agency will assume no significant impact.

Further, USFS has proposed to allow emergency orders, which would further truncate the review process. The USFS may elect to seek an Emergency Situation Determination (ESD). If the ESD is sought and granted, it would expedite the actions proposed and waive the pre-decisional objection process. This would allow expedited commercial sales of timber and logging on public land by the summer of 2022, while limiting public comment to a mere 30 days.

Region 5 Post Disturbance Hazardous Tree Management will create a cascading series of problems for the forest ecosystem, inhibit wildlife survival, will damage soils and increase erosion, and will create the conditions that enable the next mega fire in California.

We request the agency halt its plans, and instead dedicate its resources to habitat restoration, which implies preserving and protecting old growth trees and snags, closing roads that are unnecessary, (prioritizing access to non-motorized trails, picnic areas and campgrounds), remediating roads by restoring native plant species and trees, leaving wilderness areas and proposed wilderness areas and trails untouched – (other than by performing trail maintenance), and taking a thoughtful approach to the preservation and protection of California wildlife and its forest ecosystems.

This is essential to fighting climate change, which is vital to future of the state, the nation and the world. The current plan, and its lack of a complete environmental review, is a great threat to the life and health of the planet, and all the species that depend upon it.

Sincerely,

A handwritten signature in blue ink that reads 'DL Wulff'.

Deanna Lynn Wulff
Executive Director & Founder
Unite the Parks