

Data Submitted (UTC 11): 11/10/2021 8:00:00 AM

First name: Patricia

Last name: Puterbaugh

Organization: Lassen Forest Preservation Group, Yahi Group Sierra Club

Title: Principal

Comments: I appreciate the opportunity to provide early feedback on this proposal to remove hazard trees following recent fires.

The Lassen Forest Preservation Group (LFPG), Yahi Group Sierra Club has been monitoring projects on the Lassen National Forest (LNF) for over 25 years. We have been heavily engaged in all significant logging projects during this time. More recently we have also been monitoring some Plumas National Forest (PNF) projects on the Feather River Ranger District. I personally am a member of the Butte County Forest Advisory Committee. This Butte County committee engages with both LNF and PNF on projects within Butte County borders. I am also a collaborator with many public and private entities on the South Lassen Watershed Group (SLWG) and the Burney-Hat Creek Collaborative. These comments are not associated with those organizations.

It is simply heartbreaking and devastating to live in and observe the destruction wrought by 3 huge wildfires in and surrounding Butte County in the last 3 years. These include The Camp Fire, The North Complex and now the Dixie Fire. These communities and forests are our homes, and backyards. These fires have variously affected all our friends and family.

It is very important to us to be able to engage with the USFS on the plan for recovery, restoration and creating resilience in our neighboring National Forests.

This project proposes to remove hazard trees from striking distance of infrastructure, e.g., roads, trails, and facilities, located within the fire perimeter of specific fires on nine national forests. We appreciate the need to provide for public safety, especially in developed areas that are highly used. The achievement of public safety, however, must be balanced with protection of sensitive resources. The map showing LNF roads to be worked is, to put it bluntly, insane.

LFPG has many times commented on and reviewed Hazard Tree Removal Projects. We have consistently asked that hazard tree projects take each specific area into consideration and "go lightly" with the saw. So many of the trees along roads, in campgrounds and near public infrastructure have not been part of commercial logging projects. They have often been saved from logging and a great many of our large, old trees still stand along roads for the public to enjoy. We absolutely agree that hazard trees near infrastructure, along well traveled roads and in public places will need to be removed. However, we do not agree that all dead trees need to be removed from less traveled roads, trails and wilderness areas.

As you are well aware we have had many severe wildfires in the last decades. As far as I know, there has never been a proposal to enter wilderness or roadless areas to remove hazard trees. We oppose this plan. There may be trails, or trail heads that are heavily used, or near infrastructure that will need to be worked. But, in general wilderness and roadless areas should be left alone to provide an untreated experience and recovery that nature alone can provide. I cannot imagine the controversy that will ensue if you were to propose logging 200 feet on each side of the Pacific Crest Trail? Yes, maintenance will be needed yearly, providing seasonal jobs, but there is no reason to preemptively log along our wilderness trails. The "hazard" to hikers is certainly no worse than the myriad of dangers that exist in the wilderness. This is why people trek in the wilderness. To experience raw nature and the mystery it provides.

The cost to wildlife, which has already been heavily affected by the fires, would be monumental if this plan unfolds as you propose. We know burned forests are extremely important to many species. We know tens of thousands of acres will be clear-cut by private companies. We know the USFS has and will salvage many

thousands of acres. Leave the wilderness and roadless areas to heal, as nature knows best. Let the animals and plants repopulate without the heavy touch of man.

We are aware that many dozer lines and trees were cut in wilderness areas with varying degrees of success in helping the fire fight. We absolutely oppose any plan to use these dozer lines to recover any trees out of wilderness or roadless areas. These dozer lines need to be rehabilitated and closed. There is already a risk for illegal off-road vehicle use in these areas. Invasive species and erosion are also a concern. Logging would only compound these problems.

We understand trees will need to be removed along heavily traveled public roads and mostly likely along USFS roads 3, 4, 5. Some level 2 roads are more often used by the public and may need to be treated. However many level two roads and roads that are only open for logging purposes should be closed and decommissioned. It will be decades before these places will recover and have potential for commercial use again. Close and decommission these roads, pull culverts and allow these areas to recover as nature intends. Again, we understand any roads near infrastructure or that are heavily used will be worked and this should be a priority.

The fact is, and the USFS very well understands, that much of this work will be almost impossible to achieve. Looking at the LNF map, Almanor & Hat Creek Ranger Districts is simply crazy! There is simply not a workforce or infrastructure in place for such a huge undertaking. And, the cost? Why not write a project plan that is achievable and effective? A plan that will be successful and truly protect the public interest in our national forests while protecting our forests of the future?

This does not even take into account the dire need to take care of the GREEN forests that are still standing. How can this work possibly be done without again sacrificing needed work on green forests and intact infrastructure. As I have stated, I have been working with the LNF for decades. Unfortunately in the last decade we have been almost exclusively "chasing fire". Salvage logging gets done while restoration, renewal and work on green forests languishes.

Thank you very much for taking my comments and I will look forward to a plan from Region 5 that is ecologically balanced, sustainable and achievable.