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Comments: In the past roadside hazard timber sale conducted on the Klamath and other national forests have been plagued by the following problems/violations:

1. Large trees that do not pose a substantial hazard but are located near roads have been targeted, improperly designated as "hazards" and removed. Investigations have found that was intentional.

2. Trees have not only been cut within riparian areas and other wetlands but they have been removed from riparian areas and other wetlands, often in violation of Clean Water Act provisions in Basin Plans.

The attached photo, taken in 2011, shows large trees that were removed from one of the same areas (Carter Meadows and vicinity) in a prior FS timber sale on the Klamath National Forest. This was timber "volume hunting", not forestry, and the trees were not hazards to public safety. It looks like KNF officials intend to go back to this same area every ten years to engage in "volume hunting". Please stop using hazard trees as an excuse to target and remove large old growth trees. If you want to log, call it what is is, that is, a timber sale. Please stop abusing your ability to designate and address hazards.

In order to avoid these past problems the project should include the following:

1. Strict guidelines for what is and is not a hazard tree, including explicit instructions to not fell and remove trees that do not pose an immediate, short-term risk to life and personal security of road users on roads open to public use.

2. Follow the FS's own guidance on hazard tree designation and removal, including guidance found at the following links:

http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/95954_FSPL_T3_1428331.pdf

<https://www.fs.fed.us/treeclimbing/tree-hazard-assessment/r5-ht-awareness.pdf>

3. Because they have removed non-hazard trees in the past, provide training in what is and is not a hazard tree to any and all personnel who will decide which trees to mark for removal.

4. Do not include any level 1 maintenance roads in the projects. Those roads are closed at all times unless there is a specific project for which they are needed. Therefore, there is no treat to the public or staff (who should not be using those Level 1 roads, especially with vehicles) and hazard trees can and will need to be removed when and if the road is opened to the public or for a project. If you include level 1 roads you will be indicating that you are just after "volume" of timber and not trees which are a true hazard to forest user and FS staff health and safety.

Maintenance Level 1 roads included improperly in this project include many roads which are spur roads. These roads are just for logging and are permanently closed to the public. They have no place in this project, indicate "voilume hunting", and should be removed fro the project.

Numerous other Level 1 maintenance roads and logging spur roads are improperly included in the project, which also indicates "volume hunting." For just one of the areas targeted - Carter Meadows on the KNF - level 1 maintenance and spur roads improperly included in the proposed project include roads: 376N14, 37N09, 38N10A, 38N16A. There may be more because the project maps are hard to follow with many road numbers not

included.

5. Any and all trees that are located within riparian areas, Aquatic Reserves and other wetlands and which are deemed a hazard may be felled but should be left in place because, as science clearly indicates, those trees are needed in order for the aquatic and riparian and wetland systems to function properly.

Please keep me informed about the proposed project and please stop trying to disguise timber sales which aim for volume as something else, including hazard tree removal.