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Comments: See attached.

The following comments from Wilderness Watch on the Region 5 Post- Disturbance Hazardous Tree Management. Wilderness Watch is a national wilderness conservation organization with headquarters in Missoula, Montana. Our mission is to protect the wilderness character of all units of the National Wilderness Preservation System, including those areas within Region 5. We have some concerns and questions about the proposal.

Introduction

We spoke with Christine Handler today about the proposal and learned the intent was not to go into Wilderness or roadless areas. While that is reassuring news, we do have questions about the proposal as the scale of the maps are too small to drill down into details. Further, the earlier version of the maps posted on the Forest Service website did show this project going into Wilderness and the current version of the maps apparently still show the project would go into some roadless areas.

Specific Wilderness Concerns

Some of the trail that would be logged do lead into Wilderness or are trails that follow the boundary of a Wilderness, going in and out of Wilderness. Some examples are trails leading to the Marble Mountain Wilderness (see trails 5202, 5203, and 5206 on Klamath map #2) and trails on the boundary of the Trinity Alps Wilderness (see trails 5470, 5474, and 5477 on Klamath map #4 and the image, from wilderness.net below).

See map is in the attachment.

We have three concerns with activities right on or near the wilderness boundary.

- * It is difficult to tell where the wilderness boundary begins and ends on a boundary trail that goes in and out of Wilderness.
- * The width of the tree cutting, according to the scoping letter, could also intrude into the Wilderness even if the trail is outside of the Wilderness.
- * •Regardless of the above concerns, activities, including motorized use, that are near Wilderness could negatively affect the Wilderness. In that case, a CE is inadequate to evaluate those impacts.

Similar concerns exist with roads. As with trails, in some instances the wilderness boundary may be closer to the road (it may be offset as little as 33 feet from the center line) than what the scoping letter proposes for logging (about one and a half tree lengths or more). In at least one instance, a road scheduled for logging under this proposal was apparently constructed after designation of the Marble Mountain Wilderness and may actually intrude on the Wilderness.

This road, 15N17, is included on the Six Rivers National Forest map #3.2 See the following image from wilderness.net. Image in attached comment document.

The above examples are not exhaustive. Other examples include a cherrystemmed trail in the Ansel Adams Wilderness and numerous roads and trails that lead up to or border the Ansel Adams, Kaiser, John Muir, Mt Shasta, Yolla Bolly-Middle Eel, Golden Trout, Caribou, Bucks Lake, and Domeland Wildernesses. There may be

others. Also, the Trinity Wilderness contains many such roads and trails on various maps. If this project goes forward the Forest Service must rigorously explore and develop alternatives that would lessen environmental impacts, including impacts to wilderness character[mdash]see 42 U.S.C. [sect] 4332(2)(E)--or alter the proposal so that Wilderness is not affected.

Other

It is problematic that the Forest Service would consider an emergency determination (ESD) for fires that occurred in 2018, three years ago. The maps clearly reference fires from 2018. That hardly seems an emergency. Such a large-scale proposal over many national forests cannot be approved with a CE. It requires site-specific NEPA analysis.

Summary

Please keep Wilderness Watch informed about this project. We encourage the Forest Service to completely avoid Wilderness, as we have been told would be the case, as well as avoid any impacts to Wilderness from nearby activities.