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First name: Cooper

Last name: Otte

Organization:

Title:

Comments: Text of attached letter:

Comment on 2020 Fire Affected Road System Risk Reduction Project Proposal scoping document

Dear Ms Gustavson,

I am submitting these comments to the 2020 Fire Affected Road System Risk Reduction Project Proposal.

I am concerned about cumulative impacts to Endangered species listed, sensitive, at-risk, and Management Indicator species.

I am concerned about potential impacts to water quality of streams. I request you analyze for impacts, including possible further degradation, to any Clean Water Act 303(d) listed streams in the project area.

An EIS needs to be prepared to adequately consider direct, indirect, and cumulative impacts of this project on the human environment, native species (including listed species), their habitat, Inventoried Roadless areas, Potential Wilderness areas, and water quality. An EIS is required for this project for two other reasons. The project covers considerable geographical scale. It also encompasses a series of connected actions over a common geographic area over a similar time frame.

The Purpose and Need for the project is overly narrow as to presuppose a proposed action which is already the preferred action. Page 3 of the scoping proposal states "There is a need to[. . .] prevent the future accumulation of trees which will continually make roads impassable." All forest roads including those through unburned areas are subject to trees falling and making the roads impassable. Where the forest service deems roads must remain open, I request analysis of an alternative which deals with this by routine clearing of trees after they've fallen on the road.

I support the decision to exclude from treatment roads with management recommendations "remain closed", "analyze for closure" and "analyze for decommissioning". I request that you use this opportunity to act on recommendations to decommission and close these particular roads.

Page 4 of the scoping document states, "The Road Investment Strategy made long-term management recommendations according to access value and risk ranking for each segment of road across the Forest." I appreciate road-segment specific depth of analysis and I request you disclose the full assessment of each road section describing how each recommendation was made.

I am concerned that the only proposed treatment for fire-affected trees deemed likely to fall is felling. It concerns me that this can include living trees with old growth characteristics which are at the very edge of the potential road strike distance. I request you consider other hazard tree mitigation techniques to include in preference to felling wherever possible. I request that you make allowances to individually weigh the many ecosystem benefits of each large tree to allow for possible individual exceptions to felling where it may be technically merited by the narrow risk assessment metrics. I request you prepare an EIS in order to determine whether there are such alternatives that would meet the project's objectives.

These comments are timely, submitted via email by the stated deadline of April 15th 2022, as well sent via postal service, certified return receipt and post-marked by April 15th 2022.

Signed,

Cooper Otte