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Comments: The sheer size and geographical breadth of the Region 5 Post-Disturbance Tree Management Project #60950 requires our utmost attention. A multitude of watersheds between the South Fork Eel and the Smith River stand to be impacted. In addition to habitat and ecological issues, GHG emissions will drastically increase and postpone the recovery of fire-damaged forest. A much more rigorous environmental impact assessment than what has been done is more than appropriate.

Although logging fire-affected forests raises a range of environmental issues, I will confine my remarks to the climate impacts. Our changing climate helped set the stage for the rampant wildfires that have left their mark on so many miles of forest. While the loss is severe, those affected forests still retain up to 80% of their original carbon. How they are treated now will make a huge difference in carbon emissions. Can we now, post-disaster, get our priorities straight and make decisions that won't increase climate liability?

Of course, removing hazardous trees alongside trails and roads is necessary. The Forest Service must guarantee that the job will be done with respect for the priorities of carbon sequestration and ecosystem recovery now that we cannot take either for granted. Efforts should focus on roads that are actually in use or necessary for critical services. This could be an opportunity to abandon the surplus of poorly maintained, rarely used dead-end roads that leak sediments into streams.

Salvage logging may make intuitive sense to the general public, but forestry experts know that post-fire logging isn't a simple matter of harvesting timber that would otherwise "go to waste." Large trees, in particular continue to harbor much carbon even if dead. Fire-damaged trees can recover. The soil sequesters carbon that would be released if subjected to heavy equipment. These impacts must be minimized.

To summarize, 350 Humboldt urges that a full EIR of the project be conducted. Limit the scope of tree removal to essential zones and allow non-essential, rarely used roads to return to forest.

Though logging delivers necessary wood products, it undeniably converts forest carbon sinks into net emitters. To minimize the climate cost, conventional logging practices must be re-conceived, not prescribed as a cure. [Impacts of Forest Thinning on Wildland Fire Behavior" Forests 11.9 2020] The disaster of wildfire will heal more quickly than the disaster of opportunistic clear-cutting.

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