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RE: Post Disturbance Hazardous Tree Management Project

Dear Forest Service Planners,

The Mount Shasta Bioregional Ecology Center (The Ecology Center) thanks you for the opportunity to comment on the Region 5 Post Disturbance Hazardous Tree Management proposal.

We will focus our comments to the Shasta-McCloud Management Unit (SMMU) of the Shasta-Trinity National Forest (STNF) that burned in the Lava and Antelope fires.

The Ecology Center generally supports the removal of fire-killed or damaged trees that pose threats to public health, safety, and property. We do not believe that an expedited timeline for this project is appropriate due to the extraordinary circumstances that are found within the burn scars of the Lava and Antelope fires (ESA listed species and ongoing private timber salvage harvest operations).

We believe that within the areas of the SMMU that burned in the Lava and Antelope fires, hazard trees removal should be included in a cumulative environmental analysis that addresses not only the hazard trees, but also large-scale salvage logging operations and upcoming salvage logging proposals. The roads shown in the project maps appear related to proposed Forest Service salvage projects, with only one small area related to a public use campground, "Trout Creek Campground". On a recent tour of the Antelope fire, we noted that most of the burned and hazardous trees around the Trout Creek Campground had already been felled and bucked into firewood for the campground. Reviewing the maps for the Lava fire also show proposed hazard tree management areas are directly related to proposed salvage logging operations.

We have already commented to STNF District Ranger Napper on the salvage logging scoping projects (Lava and Antelope) with the hope that the projects be combined into one project considered under an Environmental Analysis so the public can participate fully. In the Lava burned area the projects are: Guzzler rehabilitation, Lava salvage, and Hazard Tree management. In the Antelope burned area are: Lava Salvage and Hazard Tree management. We believe that analysis of these projects individually does not effectively address the cumulative impacts of the logging projects.

We do not support hazard tree logging in Late Successional Reserves. Instead, we would like to see emphasis on high mortality burned areas on roads within matrix designations and we also urge the conservation of large trees for snag recruitment. We would also like to see downed woody debris left to improve soil health, fungal/mycorrhizal growth, and moisture retention.

We would like to see a transparent and open process of post-fire roadside hazard tree management. We believe

that broader public input can achieve outcomes in which:

- *Hazard tree removal is analyzed as a cumulative effect with associated salvage logging plans;
- *Stakeholders are involved in project design, implementation and monitoring;
- *Spur roads that do not provide needed public access are de-prioritized for treatment; and
- *Substantive conservation sideboards are included to protect terrestrial and aquatic forest values of concern.

Thank you for considering our comments and concerns,
Mount Shasta Bioregional Ecology Center Forest and Watershed Watch Program Manager