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Comments: As a biologist who has worked in hazardous tree removal for four years, and who lives in Shaver Lake on Sierra National Forest, my concerns with the proposed tree removal/fuel breaks are many. Much of the proposed tree clearing will occur outside the footprint of the Creek Fire. Therefore, the trees are not an immediate hazard to the public and do not merit emergency status. At the same time, many of the trees are old growth trees found along old disused roads (some with broken gates) that really do not merit a 300' clearing on either side. Proposed work outside the Creek Fire footprint does not merit Emergency status and should go through the normal environmental review required by law. Furthermore, the Forest claims they do not have time to cruise trees, selectively protecting old growth trees from the harvest. And, having worked for the utilities, I have learned that any tree can be designated "hazardous." If a perfectly healthy live green tree has a small codominant top, that tree can be called "hazardous." Due to liability concerns, the people tasked with reviewing trees in the field err towards removal. Couple this with the fact that much of the proposed tree removal will take place in occupied fisher habitat, I believe that any roadside clearing outside the Creek Fire footprint needs to go through the normal environmental review required by law. There are cases of the endangered fisher denning in trees within 100' of roads, including major highways like 168. In short, trees that were not impacted by the Creek Fire should not be considered Emergency nor Hazard Trees and should go through environmental review. I feel, with this proposal, that the forest is succumbing to public pressure rather than using the best available science to protect our rare and precious resources.

Furthermore, endangered fishers have been found to use burned habitat Post-fire. As such, and in the interest of recovering the forest more quickly, within modeled pre-Fire denning habitat (CBI), I suggest that any burned trees within the footprint that are greater than 48" dbh or taller than 120' high, be put on hold for review before removal. I would also like to see black oaks and hollow trees protected and treated alternatively: rather than complete removal, top these trees so they cannot hit the road, and leave hollow boles in place. Often these trees are climbed during removal, and it is just as easy to top them as remove them. Roads are often built along streams, and streams tend to have the best fisher habitat. I would also like to see protections put in place to protect the watershed and riparian areas. These guidelines are generally ignored under the umbrella of "Emergency status." All in all, I see no reason to rush this tree removal, and really feel the whole thing should go through regular channels of review. None of these trees are posing an immediate danger to the public anymore. The terms "emergency" and "hazard tree" are being misused to bypass the ESA, the wetland protections act, and other environmental laws.