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Organization:

Title:

Comments: As a homeowner on the edge of the Mt. Hood National Forest, it is of critical importance to me that the removal of 'danger trees' not be leveraged as an excuse to get timber volume. I respect the objective of ensuring public safety, but there are gradations of risk based on characteristics of the site in question and the tree and the type and amount of public exposure, so felling of hazard trees must be balanced against other important objectives such as wildlife habitat, carbon storage, water quality/stream shade, etc.

As such, I am requesting that the Forest Service consider and prioritize the following:

- 1) A more risk-tolerant approach in the most sensitive areas like riparian zones and where old growth trees are present
- 2) Prohibit the use of heavy equipment off roads
- 3) Temporarily close or limit the use of roads until hazards are naturally removed as a result of weather and decay
- 4) Top or trim trees that could still survive if impacted portions of the trees are removed
- 5) Prohibit cutting live, green trees, since all surviving trees are helping to rebuild the below-ground ecosystem, stabilize soils, and serve a valuable role as legacy structure and a recruitment pool for future large trees and snags
- 6) Focus tree removal on imminent danger or hazard trees located within striking distance of high use areas, such as developed sites, parking lots, and paved roads
- 7) Wherever possible, use hazard trees for restoration of streams and placement in nearby stands that lack large wood
- 8) Where they do not pose an immediate threat to safety, all trees presumed to be dying should be treated as live until they are dead, so as to not lose the ecological benefits of those trees that may survive
- 9) Take measures to stabilize impacted slopes in areas where roadside logging is unavoidable
- 10) Analyze the cumulative impacts of all post-fire sales and roadside logging projects across agency jurisdictions

I also object to commercial sale of hazard trees, because there are economic conflicts of interest that could lead to ecologically important large trees being removed for the wrong reasons. As we have seen recently in other parts of our state; the results being irreparable damage to old-growth forests. And the need for large trees for restoration purposes far outstrips the supply, creating an unrealistic expectation for future harvest potential.

Please exercise extreme restraint with this work, our forests are a critical element in protecting our struggling climate.