Comments: Public Comment on 2020 Fire Affected Road System Risk Reduction Project

Dear 2020 Fire Affected Road System Risk Reduction Project Elsbeth Gustavson,

Please accept these scoping comments on the 2020 fire-affected road system risk reduction project.

Thank you for scaling back the scope of the initial project and working to prioritize only the most severely burned areas and roads with the highest use and access needs. However I do have some concerns and considerations.

I'd like to urge Forest Service to focus roadside treatments on:

-Roads that provide ingress and egress for rural communities.

-Roads that access developed recreation sites and trails.

-High-use roads in stands that experienced high severity stand-replacement fire.

-Trees uphill and within 100 feet of roads and infrastructure that are highly likely to fall on roads.

On the other hand, please avoid roadside treatments that cut trees:

- More than 100 feet from roads, downhill or leaning away from roads, or are not dead and might survive.

- In areas that burned at low and mixed fire severity.

- Along low-use and duplicative level 2 roads, all level 1 roads, and roads that don't show up on Motor Vehicle Use Maps. Don't open roads preemptively, just because they might be used for logging someday.

-In riparian reserves, Late Successional Reserves, and other sensitive areas.

The forest needs fewer roads, not more roads. Roads just make it easier for motor vehicles to access areas that should be inaccessible to them. This reduces abuse, erosion, trash dumping, illegal camping, and illegal harvest of forest products.

When considering the guidelines for what trees to cut, please err on the side of leaving trees to provide for important wildlife habitat, minimize soil disturbance, and retain stored carbon. Use site-specific information to determine what trees are an imminent danger, restrict any tree cutting to those within 100 feet from a road, and please be sure to protect riparian areas appropriately - don't throw out guidelines for protecting streamside buffers just because an area burned. Along many roads, you could wait longer to see what trees are actually in danger of falling on roads.

When considering cutting trees along roads that access backcountry trails, please work to minimize felling or logging trees in order to protect scenic values. The users of these trails largely appreciate fire as a natural forest process and expect snags and other natural forest structures - not clearcuts along the roads to their favorite trailhead.

While this proposal includes fewer roads than last year's nearly 400 miles, the project could still be scaled back more and still provide adequate access to infrastructure, recreation sites, and private land inholdings. There are already too many roads on the landscape. Prioritizing which ones are reopened is important to minimize damage to public values. I would like to see only level 3, 4 and 5 roads - which are most used and needed for public access prioritized, as well as only those level 2 roads that access recreation sites, important infrastructure or provide ingress/egress. Other roads can wait.

Please also be sure to consider the added effects of nearby salvage logging - both along non-forest roads and forest lands they access.

Finally, in your environmental analysis, please give sufficient detail and consider enough alternatives that the public can make informed comments and weigh the potential impacts to our public lands.

In summary, rather than a one-size-fits-all landscape-level approach to hazard tree removal, management of sensitive fire impacted forests should be site-specific, thoughtful, and only target trees that truly pose a threat to public safety. Hazard tree removal activities should not occur in rarely-visited places, or places that could reasonably instead be closed to the public as nature takes its course.

Thank you for your consideration.

Sincerely,

Mr. Dennis Pennell