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Organization:

Title:

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

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

These are 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.

As you continue planning, please focus all roadside treatments on: (1) Roads that provide access for rural communities; (2) roads that provide access to developed recreation sites and trails; (3) high-use roads in stands that experienced high severity stand-replacement fire; and (4) hazard trees that are uphill and within 100 feet of roads and infrastructure and that are highly likely to fall on roads.

Similarly, please avoid roadside treatments that cut trees: (1) More than 100 feet from roads, downhill or leaning away from roads, or are not dead and might survive; (2) in areas that burned at low and mixed fire severity; (3) along low-use and duplicative level 2 roads, all level 1 roads, and roads that don't show up on Motor Vehicle Use Maps. Do not open roads preemptively, just because they might be used for logging someday; and (4) in riparian reserves, Late Successional Reserves, and other sensitive areas.

When developing guidelines for which trees to cut, please (1) leave 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; (2) restrict any tree cutting to those within 100 feet from a road; (3) protect burned riparian areas appropriately; and (4) only cut trees with a substantial risk of falling on roads.

When considering whether to cut trees along roads that access backcountry trails, please minimize felling or logging trees to protect scenic values. Trail users appreciate fire as a natural forest process and expect snags and other natural forest structures - not clearcuts along the roads to their favorite trailhead.

Overall, please continue to scale the project back and reduce the number of roads on the landscape. Only include level 3, 4 and 5 roads as needed for high priority public access, and level 2 roads to recreation sites and important infrastructure, while also considering the added effects of nearby salvage logging. 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,

Dr. Marc Liverman