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Comments: The Forest Service's largest timber sale in modern history, the "Region 5 Post-Disturbance Hazard Tree Project" is misguided and puts California's National Forests in danger. The project would allow logging of fire-affected trees - so-called "salvage logging" near roads and trails across California's national forests. It is so large that the Forest Service split it into three zones-North Zone, Central Sierra and Southern Sierra-with each zone covering multiple national forests. I live in the North Zone which covers our nearby forests, the Six Rivers, Shasta-Trinity, Mendocino and Klamath National Forests.

After reviewing the Forest Service's proposal, I think that key elements must be considered which should focus on high-use roads, Also more environmental assessment is needed before any more progress is made on this project.

1. The agency should focus efforts on high-use roads and other roads that serve a critical purpose, coupled with a review of the existing road network to see which roads were no longer necessary.

I agree that removing trees that pose a hazard to road and trail users is appropriate. But the Forest Service has done the opposite: almost limitless logging that would enable long snaking clear-cuts across our public lands when a focused and narrowly tailored project would be more appropriate. While the Forest Service claims that this logging is necessary to keep roads safe, most of the roads slated for logging (81%) are poorly-maintained and rarely-used Maintenance Level 2 roads- agency-speak for roads managed for high-clearance vehicles and not intended for frequent travel. While some Maintenance Level 2 roads are important as ingress/egress routes in the case of an emergency, most serve no vital purpose.

These roads are vestiges from another era, when National Forests were primarily managed for timber production, and we have way, way too many of them. Many roads that the Forest Service says are "vital" are in fact dead-end spur roads that are maintained for no other reason than to facilitate logging. Crisscrossing the landscape, these roads are a chief source of sediment pollution to local waterways, as they are often poorly maintained and constructed, with undersized culverts.

2. The project treatment areas contain multiple Tier 1 key watersheds and Critical Habitat for threatened and endangered salmon. It will potentially impact more than 239 sub-watersheds with increased sediment pollution, including 30 municipal watersheds.

Post-fire logging adds a disturbance on top of another disturbance, making already erosive landscapes bleed more sediment. Nearly every major river on the North Coast would be affected-from the Smith in the north to the South Fork Eel in the south.

3. The project will impact nearly every northern spotted owl Critical Habitat Unit in Northern California and also would allow commercial logging within Late Successional Reserves and Riparian Reserves.

Northern spotted owls, Pacific fishers, Humboldt martens and other forest denizens would see their nest and denning trees logged. How many? It isn't clear because the Forest Service will not complete surveys to protocol before logging is planned to commence. The plan includes areas that we know were used by northern spotted owls and other species that require large, old trees and forests for their survival.

4. The project area is too big and impactful for solely an Environmental Assessment (EA). The agency must conduct an Environmental Impact Statement (EIS) before continuing forward.

The agency should focus efforts on high-use roads and other roads that serve a critical purpose, coupled with a review of the existing road network to see which roads were no longer necessary. That would have found common ground to better protect the remarkable region of the North Coast. Instead, we have a massive timber sale in fire-affected watersheds that most certainly will include environmental impacts to our national forests and important wildlife habitats.

Please focus Forest Service efforts on high-use roads. More environmental assessment is needed before any more progress is made on this project!