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Comments: I STRONGLY OPPOSE the "Region 5 Post-Disturbance Hazard Tree Project," the logging of fire-affected trees-so-called "salvage logging" across California's national forests. This is the LARGEST TIMBER SALE in modern history. Let us be completely honest that this 'timber sale' and the profits generated are at the expense of the forests' ecologies, the watersheds, and the ecosystems that have been slowly adapting to the dramatically disturbed areas of the 2020 fires.

The scale of the proposed logging is enormous and the absolute misguidance of "salvage-logging" at a time when we need to let the forestland rest. Land erosion and compacted soil from heavy machinery on the forest floor - a project which includes 5,780 MILES OF ROADS and trails (the distance from LA to NY!) will cause irreversible damage to the mineral soil. Northern spotted owls, Pacific fishers, Humboldt martens and other forest life will be pushed further toward or to extinction. The forestland has been healing, watersheds and animals have been adapting to the burned areas with nests and habitat that will be demolished by this project.

In the North Zone, the Forest Service is proposing to log up to 600 foot swathes across 2,708 miles of roads and 341 trails, equaling nearly 200,000 acres of clear cuts for these roads and trails.

Uncounted and UNDISCLOSED by the Forest Service are the number of landings necessary to pile the logs before they are hauled out of the forest.

These are not dead forests. In many cases, the Forest Service would be logging forests affected by fire but still very much alive, with only a 60% chance of succumbing to fire wounds in the immediate future. Much of this land is more fire resistant because of the fire scar. Individual trees that have been killed by fire play an important role in fire-adapted ecosystems. Removing trees that pose a hazard to road and trail users is appropriate, but the Forest Service is misusing this logic and has done the opposite: almost limitless logging that would enable long snaking clearcuts across our public lands when a focused and narrowly tailored project would be more appropriate for road safety and access.

#### WHAT ABOUT FOREST HEALTH?

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-impacting in total more than 239 sub-watersheds with increased sediment pollution, including 30 municipal watersheds. The project treatment areas contain multiple Tier 1 key watersheds and Critical Habitat for threatened and endangered salmon.

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. The project touches nearly every spotted owl Critical Habitat Unit in Northern California and also would allow commercial logging within Late Successional Reserves and Riparian Reserves. THIS IS UNACCEPTABLE.

There is another path 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.

In conclusion 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 and pollution, including 30 municipal watersheds. 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. 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.

DO NOT ALLOW THIS