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Comments: The project area is too big and impactful to be assessed solely via an Environmental Assessment (EA). THE AGENCY MUST CONDUCT AN ENVIRONMENTAL IMPACT STATEMENT (EIS) BEFORE CONTINUING FORWARD.

The scale of the proposed logging is enormous. The project includes 5,780 miles of roads and trails. 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. 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. Even individual trees that have been killed by fire play an important role in fire-adapted ecosystems. DEAD TREES ARE A VITAL, IMPORTANT COMPONENT OF HEALTHY, LIVING, FUNCTIONING FOREST ECOSYSTEMS, amongst other critical roles, providing nesting sites for wildlife. Removing them would have a significant impact, which would include impacts upon federally listed threatened/endangered species, the Humboldt Marten and the Northern Spotted Owl.

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. Post-fire logging often results in degraded water quality, the spread of invasive plants, and loss of habitat for rare, threatened, and endangered species. It can also increase the risk of high-severity fire since logging leaves behind a buildup of slash and finer "fuels."

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. Nest and denning trees for Humboldt Martens would be logged. Humboldt Martens are ostensibly protected as a threatened species under the Endangered Species Act. Their population has been decimated and their habitat destroyed and fragmented by reckless logging practices. In its final listing determination, the U.S. Fish and Wildlife Service recognized that Humboldt Martens remain at grave risk from ongoing habitat loss and fragmentation due to unchecked logging and the increased frequency of wildfires.

The Forest Service asserts that aggressive logging is necessary to maintain its road and trail network. Removing select individual trees that pose a true and verified hazard to road and trail users is appropriate. Limitless logging is not. The logging that has been proposed would enable long snaking clearcuts across our public lands when a focused and narrowly tailored project would be more appropriate. 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 identify the many, many roads which are no longer necessary.

Most of the roads slated for logging (81%) are poorly-maintained and rarely-used Maintenance Level 2 roads - 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 there are a great number 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.

The project area is too big and the project too impactful to be assessed solely via an Environmental Assessment (EA). The failure to undertake proper environmental analysis means that project impacts will never be adequately examined, and mitigation measures to reduce harm through better project design will not be incorporated.

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