

Data Submitted (UTC 11): 5/11/2022 8:54:14 PM

First name: Frank

Last name: Toriello

Organization:

Title:

Comments: This project is much too incredibly large to not be addressed by an Environmental Impact Statement. Just the Northern Zone would potentially have logging on almost 200,000 acres. The Biological Assessment for the Northern Zone divides the treatment acres into four severity categories: high, moderate, low and unburned to low. Given the categories I'm familiar with of low severity fire being defined as 0% to 25% of tree mortality, the unburned to low category is a real curiosity and needs further explanation, but even these areas will have trees removed.

Even in high severity fires defined as 75% to 100% tree mortality, in an area this large (64,443 acres) there would be considerable numbers of trees that survived, but this project is so large that the Assessment declares "nearly all of the trees within the high burn severity will be removed", undoubtedly due to expediency. The Assessment also declares the "Project area has been deemed 300 feet from centerline of road or trail" implying that really tall trees abound in all the proposed project areas even though 97% of California's forests have been logged. I'm concerned that due to the aforementioned expediency in dealing with this massive project, tree height mapping will not occur and the landscape will be defaced with 600 foot scars snaking through the forests. Although there are guidelines for determining hazardous trees, I doubt if much considered selection will occur due, once again, to expediency on such a massive project. Powerline right-of-ways are easily seen in satellite images and these scars would be even more massive.

Much of this project will be occurring in Late Successional Reserves and Critical Habitat Units of the Northern Spotted Owl. It is known that forest stands burned in high severity fires are the preferred foraging areas for the Northern Spotted Owl. "After accounting for distance, spotted owls selected burned areas for foraging over unburned forest, with the greatest selection for high-severity burned areas." (Habitat Use and Selection by California Spotted Owls in a Postfire Landscape, Monica L. Bond et al., Journal of Wildlife Management 2009) The operations would remove much of the regenerating complex early seral forest which also serves as forage and habitat for many fire adapted species beyond the Northern Spotted Owl.

This project will additionally impact numerous watersheds which contain critical habitat for threatened and endangered salmon and also impact the McCloud River Redband Trout, a Species of Special Concern. The operations will undoubtedly create erosion and resulting sedimentation pollution into streams, including municipal water supplies. The large corridors created by this project will also impact future fires in these areas by allowing faster wind speeds to occur increasing the severity of these fires.

Forest Service lands were closed to the public last year after the Bradley Fire near McCloud, CA. This fire was ignited by the campfire of a negligent camper. In terms of safety, many of the roads included in this project may better serve public safety by being closed instead of being subject to hazardous tree removal. Although lightning ignites many of the wildfires in this area, humans also cause a great number of fires. Closing access to terrain where firefighting is difficult may be a better solution than the logging proposed by this project. An Environmental Impact Statement discussing this alternative and all the preceding issues above would better serve the public.