

Data Submitted (UTC 11): 5/11/2022 9:53:43 PM

First name: Karen

Last name: Pickett

Organization: Bay Area Coalition for Headwaters

Title: Director

Comments: My comments are related to the North Zone of the proposed "Region 5 Post-Disturbance Hazard Tree Project" in the publicly owned National Forests in California.

This Project represents such an extreme, reckless and backwards approach to both healing precious forests after wildfires, and to recognizing the importance of our forests in mitigating the climate crisis, that the intent of the Project must be brought into question. If the agenda is bringing profits to timber corporations from commercial logging while limiting public or scientific opposition, this Project fits the bill. If the agenda is to manage forests on public lands, particularly forests affected by fire in a way that healthy eco-systems, wildlife habitats, healthy rivers and climate crisis mitigation can return to national forests, then the thrust of this Project must be re-worked. It is the latter intent that should drive a public agency.

The Project plan reveals a wholesale approach to removal of so-called hazard trees in burned areas. While care must be taken to minimize hazards in frequently or heavily-used roads, thousands of miles of roads remain in national forests left over from an earlier era of aggressive logging and a boom of timber sales to private profit-making corporations. Those "left-over" roads, already sources of erosion and pollution into the state's watercourses, should either be "put to bed" by restoration efforts, or left alone to join the natural contour of the land. Maintaining those roads, cutting trees on their perimeter and hauling those cut trees out will clearly exacerbate an already hazardous situation--hazardous to the rivers, the fish, the wildlife and the land itself. 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.

The Project areas contain multiple "Tier 1" key watersheds and Critical Habitat for threatened and endangered salmon. The Project, if allowed to go forward will potentially impact more than 239 sub-watersheds with increased sediment pollution, including 30 municipal watersheds.

The Project will impact nearly every Northern Spotted Owl critical habitat unit in Northern California, and also allow commercial logging in Late Successional Reserves and Riparian Reserves. The very likely impact on wildlife and the natural landscape and river ecosystems is enormous.

To allow for only an Environmental Assessment (EA) to cover such a mammoth and impactful project makes no sense at all, scientifically or logically. The agency must conduct a full Environmental Impact Statement (EIS) before this Project is further considered.