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Title:

Comments: As a local resident of Little Jones Creek. Rd. in Gasquet, California, surrounded by the Smith River Recreation Area forest lands, I am mostly in favor of Alternative C; the conversation-oriented approach, while taking out options for commercial timber harvest, with a focus on land stewardship, allowing for more prescribed burning, esp. around communities, and addressing salvage logging practices, which none of the options seem to do. As it is, the potential for unrestricted salvage and "hazard" logging, esp. post-fire, remains.

Often the argument is made that we need to see timber profits in order to support the Forest Service and forest restoration and/or fire resilience and mitigation efforts, however time and again we see that the Forest Service is afforded millions in grant funding (tax-payer money) for often irresponsible salvage-logging clearcutting practices (even areas protected from commercial harvest, after fires), when the Forest Service does not actually profit, but runs a deficit. Also, we need to consider that when our public lands are opened up to commercial logging interests, there is always going to be an incentive to let fires go in order to benefit these interests.

As we have seen in very recent years (i.e., with the Slater Fire and Smith River Complex fire) loopholes for salvage logging are heavily exploited under the guise of "hazard tree abatement" and "forest restoration" practices. Personally, I have witnessed and documented massive clearcuts boarding right up against riparian areas in endangered species habitat (Humboldt marten and Northern spotted owl), and harvesting of large diameter trees (over 20" and up to 35") under the loophole of "hazardous to operations" where they were supposed to be left standing or at least on the ground. Clearcut areas destroy habitat and leave the forest more vulnerable to future fire, both in scope and intensity, as these areas heat up due to lack of shade cover, grow dense brush in the years the follow and if replanted at all, tend to be replanted with future timber harvest in mind (densely planted), which also leads to increased fire risk and spread as these stands burn hotter and move the fires farther. (Also when burned trees are not left standing for shade for new growth, or on the ground, fire-adapted insects and other species are also left without habitat, and there are issues of soil compaction and run off, water use and other issues surrounding logging practices and impact on the environment which are not adequately addressed, if at all. Excessive thinning practices, in the name of fire prevention also often lead to increased risk as thinned areas allow for more wild.)

And while the Forest Service has repeatedly claimed to be logging hazard trees in order to safeguard travel on public roads, what we have experienced as residents has been that their logging practices has led only to worsened, more hazardous travel conditions with more mud and debris left on the roads and clear cuts on the lower side of the road to the point of leaving nothing to stop any vehicles should they slide off (due to increased mud). The Forest Service has also been very slow to address any of our concerns over hazardous road conditions post logging, blaming lack of resources, but resources always seem readily available when it comes to logging operations, proving the the real reason for the logging is not about the public's needs or safety but about timber interest. It also does not seem to be about forest preservation (in a national recreation area) or restoration, when none of the practices seem truly focused on doing this.

As it stands, the whole proposed amendment does not follow the best science and does not include any analysis for threatened and endangered species habitat (or for that matter, any species). Also concerning is the total lack of consultation with Fish and Wildlife or biological assessment for threatened and endangered species for any of the listed alternatives in drafting the proposal.

In sum, while favoring Alternative C, I would like to see the issue of unchecked irresponsible salvage logging practices (that do not benefit the forest, or make it or communities more fire resilient), addressed for any alternative chosen, (it seems they primarily do not restrict this practice to any amount of acreage), as well as see biological impact assessments for threatened and endangered species, included.

Additionally, what seems to be glaringly absent from any of these is the addressing of industrial encroachment onto forest lands by the telecom industry with the proliferation of cell towers and antennas which not only threaten wildlife and humans through (provably) biologically harmful non native EMF exposures, but also poses increased fire risk and intensity due to the effects on plants by increasing volatile compounds. (see: https://juniperpublishers.com/ecoa/pdf/ECOA.MS.ID.555631.pdf)

As we face more pressure in Congress from telecomm lobbyists to add wireless grid structures to our forests and last remaining wilderness areas, it is time to assess these impacts and potential for harm and consider this when drafting any guidelines for forestry management practices.

Sincerely,

Shannon Bishop

IN-TEXT CITATION: Cell towers and antennae pose increased fire risk and intensity due to the effects on plants by increasing volatile compounds. (see: https://juniperpublishers.com/ecoa/pdf/ECOA.MS.ID.555631.pdf)