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Comments: I am writing as a camper, climber and lover of the outdoors to strongly oppose the proposed North Trinity County Community Risk Reduction Project and request the Forest Service withdraw the current proposal and develop a substantially revised alternative focused on community protection, small-diameter fuels reduction, conservation of mature forest habitat, and wildlife habitat.

While I support science-based wildfire risk reduction and responsible forest stewardship, the current proposal goes far beyond what is necessary to protect communities. The project authorizes commercial logging and mechanical treatment across 12,805 acres, including approximately 8,500 acres of commercial logging in some of the most ecologically important remaining public forests in Northern Trinity County. The proposal would remove between 40% and 75% of forest basal area across treatment units, construct temporary roads, establish logging landings, expand skid trails and control lines, and conduct logging within areas designated for wildlife conservation, including Northern Spotted Owl critical habitat and reserves.

The project area represents one of the last connected blocks of mature forest remaining in a landscape heavily impacted by industrial logging. These forests provide irreplaceable habitat for the Northern Spotted Owl and numerous other species dependent on structurally complex, closed-canopy forests. More than 30 documented owl territories occur within these watersheds. As the species continues to decline throughout its range, protecting remaining areas should be a key management priority rather than a secondary consideration.

I am particularly concerned about the proposal's impacts to Late Successional Reserves and Riparian Reserves. These protected areas exist because mature forests provide ecological functions that cannot be quickly replaced once lost. Riparian forests regulate stream temperatures, protect water quality, store carbon, maintain connectivity for wildlife movement, and provide critical habitat for aquatic and terrestrial species. Logging up to 2,000 acres of Riparian Reserves risks undermining these values and could have long-term consequences for watershed health.

The Environmental Assessment also fails to convincingly demonstrate that the scale and intensity of commercial logging proposed will meaningfully reduce wildfire risk to communities. Current wildfire science consistently finds that home hardening, defensible space, and targeted treatment of surface and ladder fuels near communities are among the most effective strategies for protecting homes. In contrast, extensive canopy removal can increase solar exposure, elevate temperatures, reduce humidity, increase wind penetration, and alter fire behavior in ways that may undermine long-term resilience.

The Forest Service's own data indicate that trees under 20 inches in diameter constitute the majority of stems in the project area. If reducing ladder fuels and improving forest resilience are the primary objectives, management should focus on small-diameter trees, brush reduction, prescribed fire, and strategic treatments adjacent to communities and infrastructure. Large-scale commercial logging of mature forest is not necessary to achieve these goals.

Although the project includes a nominal 30-inch diameter limit in many treatment areas, the proposal relies heavily on logging infrastructure such as landings, skid trails, corridors, and temporary roads. The cumulative impacts of these activities can result in significant canopy loss, soil compaction, habitat fragmentation, and removal of large trees. Previous logging operations within the area have raised concerns regarding compliance with tree-retention commitments and habitat protection measures. The Environmental Assessment does not provide sufficient assurance that similar impacts will be avoided under this project.

I ask that the US forest service rejects this proposal and reconsiders the implications this may have in the long term. A new proposal that can protect communities through targeted fuel management, while preserving mature forest habitat that makes this landscape so so important.

Sincerely,

Eddy Bakovic