## COMMENTS ON KNF-EAST FORK SCOTT PROJECT PROPOSAL

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We are co-owners (with Jennifer Whipple) of Section 25 (T41NR7W) on Houston Creek and a small portion on Cabin Meadow Creek. As such, we are interested in KNF’s East Fork Scott Project and our relative effect on one another. This property was previously owned (in chronological order) by TimberVest , Fruit Growers Supply Company, and International Paper Company. Last year, we completed a California Cooperative Forest Management Plan under funding from CALFIRE. There are no structures on our parcel so we are not within a wildland-urban interface. However, adequate firefighter access and management of wildfires remain of concern.

Your project purpose is laudable and similar to the plan objectives for our property. An important component that seems to be missing from KNF’s purpose statement is: Improve public understanding of the special natural features and values of this area. Will that also be addressed? Is the KNF thinking about improving public access for recreation via trails and roads as part of the project? If so, please describe where and how. What is the time period for this project proposal’s implementation?

The proposed Desired Conditions appear reasonable for the most part. For the Proposed Actions, we have the following comments:

**Forest Health & Resilience**:

* Forest thinning would likely be a benefit in certain stands. What is the projected frequency of future thinning operations? Are certain conifer and hardwood species or species mix being promoted?
* How will the planned thinning affect the unique diversity, high density and basal area cover of subalpine forests in this area? Is there an elevation limit to where your thinning will occur?
* What protections will be in place to protect native wildflowers and rare plants during thinning operations?
* When would slash pile burning occur?

**Road Sediment Source Reduction**:

* Your “legacy sediment site treatment plan” needs to be explained as to methodology. How are the priorities for treatment being decided upon? Is sediment delivery potential to a watercourse one of the primary factors? What is the road-by-road summary of your 2016 road inventory, in a table format? We’ve noticed some erosion sites along the USFS road system that do not appear to deliver sediment to a watercourse, but may be aesthetically unpleasing. Spending too much time and funding on those types of sites may detract from more important sites impacting water quality.
* An obvious example of a high sediment delivery (actual and potential) site is the Cabin Meadow Creek campground access road. A high intensity rainfall event may have created the existing new channels in this road, creating a drainage channel in the meadow below and delivering sediment to the main USFS road, then scouring above the Cabin Meadow Creek road crossing on our property to the stream below. Describe the types of treatment that you propose for this important sediment source.
* Are you considering replacing the culvert over Cabin Meadow Creek with a bridge? That spot is on our property so we need to coordinate any road improvement for this site.
* What lessons were learned from the road reconstruction that USFS performed on the Hayden Ridge road last year? Not enough critical dips or water bars were placed on the steeper sections, and drainage went down the middle of the road surface during the first winter. While not a sediment delivery priority road section, the treatment design and/or implementation on this road should have been better. Tweaking a road treatment during the first winter after initial rains could help prevent more serious erosion later that first season. This post-treatment practice should be part of the road project description, especially if contracted out.
* Some road sections are already outsloped and quite stable with little existing erosion. Identify these sections as well as the to-be-treated sections on a good scale map in the EA.
* How are over-steepened road fills to be stabilized?

**Large Woody Debris in Streams**:

* Identify which species of fish are found in each stream and cite references for surveys. Rainbow trout are found in Houston Creek and Cabin Meadow Creek, for example. What are the upper most extents for anadromous species like Steelhead/RT and coho salmon? Is there a gradient limit for upstream access?
* LWD is plentiful in Houston Creek within Section 25 and above, due to natural tree fall and logging debris. What is a reasonable criteria for adequate LWD per stream mile? What size and type?
* Indicate which stream reaches appear to lack sufficient LWD on maps and/or table.

**Travel System Access and Administration**:

* Provide a better road map in the EA with USFS road numbers for identification, as this proposal and map do not provide enough detail. Better USFS road ID would also help in the field for travelers, as current signage leaves much to be desired. Your transportation maps are hard to find.
* Gate access policy on road 41N03/41N10 between Gazelle Road and Kangaroo Lake Road needs to be clarified. Closing public access on certain roads during the winter months to protect the quality of the road surface and prevent erosion is a laudable objective, but please make that clear to the public or violations may be more prevalent. The current open dates on the KNF Road Map from 4/1 to 11/15 may need to be revised, depending upon seasonal conditions each year.
* Temporary roads and landings: would these also be revegetated following project completion? If so, with what? You only mention “closed and hydrologically stabilized”.
* Water source development appears to be for the purpose of dust control? Please clarify. If drafting from streams, describe what measures will be used to prevent dewatering of stream and sucking up any fish life. How many gallons are expected to be needed and from which sources? Are there any alternative water sources than direct diversion from local streams?
* What additional measures are you proposing to prevent “unauthorized Off Highway Vehicle use” in areas such as wet meadows? Educational signage might help in these areas.
* What is your current and proposed Annual Road & Bridge Maintenance Program for this area?

**Hazard Tree and Fuel Reduction**:

* What protections for native wildflowers and rare plants will be in place for fuel removal projects?
* What is the projected frequency of future fuel reduction actions?

**Other: Natural Features**

* Address how to improve public understanding of the special natural features and values of this area, some of which are indicated on the KNF map. We feel the USFS is missing opportunities to explain – via your front office displays, brochures and fact sheets, field tours, and on-site signage -- to the public about your special designations: China Mtn. Geologic Area, China Mtn. Botanical Area, Cory Peak Geological Area, Cabin Meadow Geologic Area, Rock Fence Creek Botanical Area, Kangaroo Lake Botanical Area. Little information can be readily gleaned about their significance. The serpentine sites support unique plant species that need public appreciation and protection. The diversity of subalpine forests in this area represents some of the most diverse in the state (Keeler-Wolf, 1990: Ecological Surveys of Forest Service Research Natural Areas in California. USFS Gen.Tech. Rep. PSW-125, pp. 16-18).
* Help educate the forest user and others about the values of the forest, wildlife, and aquatic environments of this area. Without better understanding, taxpayers and voters won’t support the funding needed to continue projects of this type or your annual maintenance needs.