



April 5, 2019

Patricia Grantham
Attn: Maija Meneks
11263 North Hwy 3
Fort Jones, CA 96032

Re: East Fork Scott Project Environmental Assessment

Dear East Fork Scott Planners and decision makers,

Please consider these comments on behalf of the Klamath Forest Alliance and the Environmental Protection Information Center as an addendum to the East Fork Scott EA comments previously submitted by the Klamath Siskiyou Wildlands Center.

The project area is located within the East Fork Scott River headwaters about 10 miles northeast of Callahan. The purpose and need for the project is to move the area towards desired conditions for improved forest health and resilience in early and mid- to late-seral habitat, enhance meadow and oak woodland habitat for sensitive plants and large game species, reduce sediment input from roads and abandoned mines, protect and enhance riparian habitat and stream shade, and firefighter and public safety within the 31,572 acre project boundary.

Specifically the project proposes commercial logging in Mid- and Late-Seral (2,365 acres), Thinning in Early Seral (1,499 acres), Meadow Enhancement (2,062 acres), Oak Woodland Enhancement (338 acres), 266 Legacy Sediment Site Treatments, Grouse Creek Floodplain Restoration (1.1 stream miles, 40 acres), Little Houston Creek Gully Restoration (0.5 stream miles), Abandoned Mine Land Reclamation (15 mine sites), Large Woody Debris Additions to Streams (four stream miles), Aquatic Organism Passage (16 sites), Fuel Reduction (2,374 acres) and Hazard Tree Reduction (30 road miles)

Connected actions proposed include: reconstruction or maintenance activities on system roads and access to 11 miles of existing temporary road, 4 miles of new temporary road construction, approximately 24 new landing construction sites, use of 24 water source sites including existing and new access sites. Road actions include, on average: 10 miles of ML1 would be upgraded to ML2, 0.5 miles would be added to the transportation system, 11 miles would be downgraded to ML1, 2 miles would be decommissioned, 3 miles of administrative changes and two miles total in three separate sections would be relocated.

While our organizations support portions of the project we have concerns with the impairment of connectivity within the Scott Mountain LSR, large tree logging, lack of northern goshawk surveys and effect to habitat and the cumulative effects from private lands logging, extensive ground based logging, road and landing construction in combination with the extensive Riparian Reserve treatments including construction of new water source access points.

SCOTT MOUNTAIN LSR & LARGE MATURE TREES

The LSRA for the Scott Mountain LSR states that, this LSR is currently lacking in the amount of late-successional habitat at only 7.5% of the capable land base. It was designated as an LSR to function as a north/south linkage between LSRs and was established as part of the forest habitat network and home range connectivity for both marten, at the higher elevation and fisher at the lower elevations. This area was necessary to provide linkage with the Klamath National Forest and the Salmon-Trinity Alps Wilderness Area. *What has been defined as mid-successional habitat may indeed have the characteristics and be functioning as late-successional habitat.*

Direction for landscape areas where little late-successional forest persists should be managed to retain late-successional patches. This standard and guideline will be applied in fifth field watersheds (20 to 200 square miles) in which Federal forest lands are currently comprised of 15% or less late-successional forest. This assessment *should include all allocations in the watershed*. Within such an area, all remaining late-successional stands should be protected.

According to the EA at page 20 the mid-late mature stands on average contain only 2-4 trees per acres over 26 inches. We are concerned that targeting trees with mistletoe would diminish the largest trees throughout the entire project area. Mistletoe and other natural pathogens are expected to

exist with higher concentrations within the LSR land designation. Removing or targeting the largest trees would be contrary to forest plan direction and to recovery of northern spotted owl and pacific fishers for all land allocations.

Page 18 of the EA states that, mid-late seral stands currently average 1,000 trees per acre. At page 21 it states, mid-late seral stands with mistletoe would average 141 trees per acre post treatment. This is an extreme loss of canopy and forest structure, which is contrary to LSRA and LRMP direction and recovery of threatened and Sensitive species.

GOSHAWK & NORTHERN SPOTTED OWL

The project analysis does not mention goshawk surveys, which must be completed as part of this project. LRMP direction states, This interim standard and guideline applies to occupied territories, as well as existing Network Goshawk Management Areas, until surveys provide sufficient data to assess the distribution of this species, and to validate the assumption that this species is adequately provided for by large unmanaged reserves. Planned timber sale areas should be surveyed to Region 5 protocol for goshawks for a minimum of 1 season (intensive protocol) or 2 seasons (broadcast only).

The Wildlife BA at page 12 is the only mention of the Goshawk Management Area in the entire EA or BE. There are about 1,461 acres of mid and late-successional goshawk habitat on federal lands within the analysis area. The BE concludes that, Alternative 2 would result in the degradation of about 588 acres of goshawk habitat, about 40 percent of the proxy goshawk habitat that is available in the Federal lands within the analysis area.

RIPARIAN RESERVES & CUMULATIVE EFFECTS

The current condition of watersheds in the project area have adverse cumulative effects to water quality due to past management activities and are not supporting beneficial uses. The project, as proposed, would include a vast expanse of the same activities (re: over 2,300 acres of commercial logging, a majority of it is ground based and road and landing construction and 507 acres of commercial logging within Riparian Reserves) that continues to adversely affect the water quality in these watersheds.

There is an extensive amount of ground based disturbance and Riparian Reserve treatments proposed. The EA and supporting documents do not disclose the actual affects of ground based logging or road and landing construction activities on sediment input. The analysis makes the broad assumption that activities would be faint, short lived and negligible and it

relies on the benefits of the restoration treatments, Project Design Features and Best Management Practices.

Most of the units have only 25-50 foot equipment exclusion zones, this is woefully less than the recommended widths in the Aquatic Conservation Strategy. In addition these minimal widths, primarily the 507 acres proposed for commercial logging, do not maintain; riparian connectivity for species dependant on dense canopy closure, the diversity or complexity of watershed, the species composition and structural diversity of the plant communities and wetlands that provide adequate summer and winter thermal regulation and nutrient filtering.

CONCLUSION

Suggestions, in addition to those previously submitted, for project implementation are as follows:

Increase canopy cover to allow mid-seral stands to maintain connectivity and their characteristics and function as late-successional habitat.

Increase canopy cover and retain largest trees within the 1,461 acres of NSO/goshawk habitat, primarily within the 588 acres proposed for degradation.

Consider slope and aspect in determining silvicultural prescriptions.

Perform Northern goshawk surveys and describe location and treatments within the Goshawk Management Area.

Disclose and analyze the watershed affects from logging activities.

Disclose and analyze and road/landing construction, or better, avoid new construction.

Limit opening riparian areas to existing water sources and utilize existing sources only.

Disclose and analyze logging activities on adjacent private lands.

Disclose the current impact that grazing is having on water quality.

Increase canopy retention in Riparian Reserves.

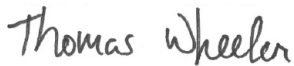
Increase Riparian Reserve Equipment Exclusion Zone buffers to reflect the widths outlined in the Aquatic conservation Strategy.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Kimberly Baker". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kimberly Baker
Executive Director
Klamath Forest Alliance

A handwritten signature in black ink, appearing to read "Thomas Wheeler". The signature is in a cursive style, with the first name being more prominent.

Thomas Wheeler
Executive Director
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