

Kristen Lark

Please find the following comments and questions on the South Fork Mountain Draft EA:

RNA Comments

In the Document that is provided as Permit to Use the two Research Natural Areas, signed by the representative of the RNA Committee, it is impossible to read the entire recommendation above the space where it was digitally signed on 4-14-26. Please provide the full recommendation.

The Permit states that the permittee would “Notify the District Ranger of each entry.” Who would be notified for the Yolla Bolla Ranger District regarding the Rough Gulch RNA? That Office has not been staffed for many years.

The permit requires “send a final report on the results of the approved activity to the Station RNA Liaison no later than one year following completion of activity, if such information has not been completely covered above.” This requirement should appear in the EA, a monitoring requirement.

On page 15 of the EA, footnote 4 states “No live trees <8” DBH would be removed unless canopy cover >40%. What does this mean?

Please incorporate the recommendations made by the Research Natural Area Committee.

On Page 63, RXF-4 Does the RNA Committee approve of broadcast burning every 2-5 years in Rough Gulch RNA?

On Pages 66-67, Are the listed activities approved by the RNA Committee?

Beargrass Management

Please state the condition of the beargrass communities since the most recent wildfires.

Then please estimate their condition in intervals over the next 20 years.

Inventoried Roadless Areas

There is no need to change their roadless nature, so only hand cutting and leaving is appropriate to prevent compaction.

Why combine North and South?

The plans for each are so different, and the EA even sheds doubt that the needed project goals will be attempted for the South portion due to costs. (see page 16), incorporated here:

“The Forests may not be able to treat all 2,923 fuels acres in the southern project area, primarily due to the cost associated with mechanically or manually treated fuels and the safety hazard posed to project personnel by the thousands of acres of snags. Table 6 below shows fuels treatment options in the southern SFM Project Area. It should be noted that this table represents the maximum potential acreage for fuels treatments. However, due to the topographic location of the outer project area boundary (mid-slope), abundance of snags, lack of defined potential control features (roads and ridges), and the cost of treatment, the primary focus would be on roadside fuelbreaks as described in Table 4.”

Please explain the meaning of the last sentence: What is outer project area boundary (mid-slope)?

What is lack of defined potential control features (roads and ridges)?

Realistically, what is the budget for the southern project area, initially and over 20 years?

The commercial thinning units south of SR 36 that would require new landing construction or temporary road clearing in areas where surviving canopy is below 40% should be dropped, since they have already achieved the target for reduced fire risk. Please eliminate them.

Since the north and south are combined in this EA, an overall analysis is needed, especially due to the connectivity needed for wildlife. As climate continues to change, a consensus seems to believe that wildlife are inclined to take new routes at higher elevations. This uniquely long mountain and the Wilderness Areas at each end call for an appropriately wide-angle analysis.

Rare plants

The plant *frasera umpquaensis* does not appear in the document, but has been found in the area of this EA. The list of rare plants seems very short and analysis missing. Please make a full analysis.

Emergency justification

To claim that this huge project is an emergency, when a main road 29N30 has been impassable for over 5 years on the Six Rivers side and then since last year on the Shasta-Trinity side, is not in keeping with the main goal of providing safe emergency evacuation routes. What is the plan for 29N30, year-by-year?

Road 1S23 has so many potholes that are occasionally filled with dirt temporarily that fast emergency evacuation has been impossible for years. What is the plan for 1S23?

These closed or difficult roads disrupt community life and need a long range plan.

The claim that the special emergency authority is needed to fulfill the overall stated goal of the project to “expedite safe evacuations during wildfires” does not compute. This Project was planned in early 2024.

Already road maintenance has been a problem. It is made more difficult because of the confusion between the ridgetop boundaries between the Six Rivers and the Shasta-Trinity Forests, compared to the alignment of the road near the ridgetop. When I asked, I was told that each Forest is responsible for the portion of road that is within their jurisdiction, even though it changes sometimes within a few feet. Please clarify which will do what.

Mistletoe

The proposed multiple entries to try to eradicate a natural phenomena does not seem an efficient way to manage our forests, which have evolved to provide a use for the mistletoe brooms used by wildlife. Please give a justification for this plan and examples where it was beneficial.

Water Quality Analysis

The analysis is not complete, as the proposed number of landings and new and reused old roads are all contributions to compacted soil and disturbance that needs to be analyzed. The Cumulative Watershed Effects analysis needs to be calculated by sub-watershed and there must be no net increase in road density since this project lies completely within South Fork Trinity River Tier One Key Watershed.

Please provide a map showing all proposed landings, temporary roads, and roads to re-use.

South Fork Mountain historically has erodible soil and is steep in most places, and the careful analysis in the two Forest Plans have classified much of the area as too steep for logging by heavy ground-based systems proposed in the EA. To try to consider amending the Forest Plans to allow for the huge amount of proposed logging over 20 years is not justified by the incomplete analysis presented.

The legal standards for careful vegetation management on the very long ridge of South Fork Mountain have been developed because of unique and rare attributes. Please consider writing an EIS to cover the many aspects to be considered that are incomplete so far.

When there is so much controversy about a project, an EIS is needed.

A good alternative Plan

The Trinity County Collaborative worked very hard together to come up with the White Paper outlining a shaded fuel break that they all agreed on.

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