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Organization:

Title:

Comments: Scoping Comments

Please include me on any further communication about this project. With such a short time allotted, these comments are brief and incomplete. There may be specific references to Shasta-Trinity National Forest, the most familiar. Grouping the comments by Zone instead of subject proved too difficult.

#### ALL ZONES

Eliminate Non-WUI, more remote, with no facilities, and less used areas.

It is stated in the Project Letter there is a need to expedite analysis and decision-making related to this Project, which "includes activities that are not novel, and for which the effects are generally well-known". This statement may apply to areas of high use around facilities and in Wildland Urban Interface (WUI) areas.

It is very important that a distinction be made between these areas and those in non-WUI, more remote, with no facilities, and less used areas.

In fact, it would be a better idea to only include in this Project the former type of areas. Including road segments with no destination, and level 2 Roads needs further determination of need and capability to maintain. The blanket assertion that level 2 roads are high use is incorrect. Some need to be decommissioned.

#### Geology/Riparian Reserves - Data Gaps

Because the August Fire Restoration for Phase 2 is deemed invalid as a CE decision due to the fact it is in a non-WUI area, the analysis process has not reached the point of answering concerns that I and others have expressed. For example, need to Field-evaluate slope stability and update databases due to Data Gaps listed high priority in the East Fork/Smoky Creek Watershed Analysis. Please see my comments for August Complex Restoration both Phase 1 and Phase 2. In West Smoky TS EA, Earth Resources and Fisheries Analysis found one large active slide area on western boundary of section 24. Also, a dormant translational-rotational landslide in units 14 and 15.

Because there is an analysis in progress for the Smoky Creek Watershed (August Fire Restoration-Phase 2), it is not included in this R5 Project for Shasta-Trinity. Similarly, the very high-use Wild-Mad Road in Six Rivers NF is not shown because it is under another analysis. How are these being coordinated?

#### Evaluate Need for roads

Use this season to evaluate the need and close un-needed roads..Be realistic in costs and personnel available for maintenance and closures.

Level 2 Roads are often un-needed and should not be included in this Project. They are not necessarily high-use.

With all the miles of roads, please justify any need for landings that are not on already-existing roads.

## Botany

The risk of weed introduction is related to the amount of soil disturbance. Please take all measures available to reduce introduction of invasive species. Removing Hazard Trees increases the risk of invasive weed establishment due to opening ground to full sunlight. These flashy fuels carry fire from roadside and suppress natural vegetation.

## Importance of Reserved Lands

### Research Natural Areas

Research Natural Areas usually have rules similar to Wilderness Areas regarding use of mechanized equipment such as chain saws, so any Trails in RNAs should be eliminated from this Project. In fact, Trails should be eliminated from this Project, since the treatment of vegetation is different than on Roads.

Specifically, in Shasta-Trinity, two Trails are marked for treatment that are in RNAs.

### Wilderness Areas

It is essential that all roads that are adjacent to Wilderness Areas be analyzed in such a way that this project will not encroach on the Wilderness values. Within 300 feet into the Wilderness Area, treating by using motorized equipment is not allowed.

Treating these roads differently than the blanket approach described is essential.

Roadless Areas do not have roads, by definition.

Proposed Wilderness Areas do not have roads, by definition.

Trails in all Reserved Areas should be eliminated from the Project.

LSRs and Riparian Reserves (RR), (referred to in Central Sierra and Southern sierra as Riparian Conservation Areas (RCAs)) should both have same requirement. See Central Sierra Design Feature Watershed5, which states, "No new landings or roads will be located within RCAs. Consult with a riparian specialist before using an existing skid trail, landing, or road located within an RCA."

Please employ this same requirement to North Zone forests. In my experience, Shasta-Trinity has not defined Riparian Reserves as required by Watershed Analysis for the Watersheds that I am most familiar with (please see my Comments, hereby included and incorporated by reference, for the August Fire Restoration, both Phase 1 and Phase 2.)

Ecological Integrity Reserve Network. Late-successional reserves, riparian reserves, and congressionally reserved lands are part of a landscape-scale approach that has worked well in supporting the integrity of ecosystems, which includes support for aquatic habitat (figure 3-1) and conservation of habitat for wildlife species. The reserve network also ensures that consistent management direction is applied to each type of land use allocation (figure Intro-3). Other plan amendments, like the PACFISH, INFISH, Eastside Screens, and Sierra Nevada Framework, also have been successful in achieving some desired outcomes including connecting and

conserving aquatic habitat and dense, multi-layered forest.

Ref

From Regional NW Forest Conservation Strategy -ACS Objectives - What is working

The stated goal #2, to maintain roads and trails and facilities

Needs more detail.

North Zone

Please see the PSW Station Regional Ecology Reports for the North Zone Forests to anticipate forecast changes due to climate and the need for the wildlife corridors and their increasing importance for adaptation. Incorporate this scientific, current information in any future plans.

Sincerely,

Karen Wilson