

Data Submitted (UTC 11): 5/11/2022 12:00:00 PM

First name: karen

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Organization:

Title:

Comments: Attached are comments

Thanks

Region-Wide Comments -All Zones-Draft EA

Please include me on any further communication about this project. With such a short time allotted and incomplete, late, or inaccessible documents for such a huge project, these comments are brief and incomplete.

There may be specific references to Shasta-Trinity National Forest, the most familiar.

Not Emergency

Following each of the fires, imminent threats were mitigated by various entities, and this is a chance to take a hard look at environmental consequences in the EA. There are always some hazards on roads, and most of them are due to poor road maintenance, although it would be good to remove hazardous trees along main roads.

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Long-term sustainable funding of trail management should be used for hazardous trees on non-motorized trails, not this Project.

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Please Define

[ldquo]Haul Routes[rdquo] [ndash] in many places in the document, it indicates that only these will receive repair and maintenance. Which are these? Are they paved? Please list them.

Key Suggestions

This Project is not an emergency and requires a full analysis, through the pre-decisional objection process, including public involvement.

Eliminate ALL level 2 and 3 roads from this Project- needed level 2 and 3 roads can be included in future EAs. The removal of hazardous trees from low-use Maintenance Level 2 and 3 roads will likely have significant negative impacts on soils, vegetation, fuels, fish, and wildlife because treatments on these capillary roads will further fragment intact ecosystems. A full EIS and cumulative effects analysis is required if level 2 and 3 roads are included. Treatment costs are higher and benefits are lower. If there are level 2 and 3 roads in WUI areas, these can be listed and analysis provided, but just treating all level 2 and 3 roads is not in the public or the forest[rsquo]s interest.

Road Repair and Maintenance is at least as important as removing hazardous trees. Explain the availability of sufficient trained personnel for road repair and maintenance.

Roads will be maintained as needed. This includes cleaning culverts, drains, ditches and cattleguards, and grading road surfaces and reestablishing rolling dips and other drainage features of the roadbeds on haul routes within the project area.

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Comments on Purpose and Need 1.

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[ldquo]Even when treefall causes no significant damage, fallen trees can create serious obstacles across major routes and significantly impact the public.[rdquo] True, but on major routes! Make the distinction.

Missing is the risks for road failure, which also can create serious obstacles across major routes and significantly impact the public. Moreover, road failure has greater impacts to resources.

Comments on Purpose and Need 3.-Fuel Loading

The secondary purpose . . . because human-caused fires tend to start near roads. Rarely-used roads have less risk and can use control burns more readily.

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[ldquo]the agency[rsquo]s financial and staff resources do not match the magnitude of the problem[rdquo]  
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[ldquo]simplified approach . . . we chose to err on the side of caution and increased safety . . .consistent with the element 1

Err on the side of caution and do not use roads until they are deemed safe before beginning any hazard tree removal.

Need to add: Need to evaluate each road for failure hazards. If this is not practical, given the overwhelming number of roads and lack of skilled workforce, it is not acceptable to take a simplified approach and err on the side of danger and decreased safety. Use whatever resources that are available and train more to prepare for an increased need for repairing road dangers.

Comments on Purpose and Need 5. Need to Provide recreational and ecological values associated with hazard trees

Cumulative effects must consider all private and public land activities. Please see more under North Zone.  
Incomplete analysis.

Proposed Action

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2 Maintain roads

3 use design features to . . .potential negative effects.- experience has shown that design features are not consistently used. Who is monitoring and enforcing?

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Tend to fall downhill away from road

Prioritized to address the most heavily used roads [ndash] when will prioritization take place?

Delayed mortality or mapping errors [ndash] please see suggestions for mapping errors

Skidding logs or trees to landing areas.- give map and list of all proposed landings

Landings constructed as needed within 300 ft of roads trails -need geology analysis

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North Zone EA Comments

USFS Pacific Southwest Region Research Station

Please see Climate-Driven Processes for the Shasta-Trinity National Forest and surrounding lands

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Sarah Sawyer, Assistant Regional Ecologist, USDA Forest Service, Pacific Southwest Region.

Hugh Safford, Regional Ecologist, USDA Forest Service, Pacific Southwest Region. Last Update: December, 2015

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Loarie et al. (2008) identified the coastal mountains of Northwest California as an important climate change refugium, defined as an area projected to sustain species with otherwise shrinking ranges. Authors like Loarie et al. and Lawler et al. recommend novel adaptive management approaches and large-scale planning efforts that promote landscape/regional habitat connectivity. Loarie et al. (2008) also recommended consideration of human-assisted dispersal of California's flora and prioritization of climate change refugia for conservation and restoration. {{emphasis added}}

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#### Importance of Reserved Lands

LSRs and Riparian Reserves (RR), (referred to in Central Sierra and Southern sierra as Riparian Conservation Areas (RCAs))

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, [ldquo]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.[rdquo]

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

No logging should take place in Riparian Reserves.

#### Adaptation and Wildlife Corridors-Smoky Creek Dispersal Corridor

Appendix E, Map 16 of the East Fork/Smoky Creek WA clearly shows this key wildlife corridor in the middle of the mainstem Smoky Creek. Please see my comment in Phase 1 of August complex Restoration insisting that this corridor be protected, especially because more migration is occurring due to climate change. Burned trees do not completely invalidate a path used for long period of time by wildlife. It will be interesting to see how they adapt.

#### Roads List

Please include a list of roads instead of just miles.

#### Roads on Maps

Both Six Rivers NF and Shasta-Trinity NF show road 1N23 as a road to be treated along the top of South Fork Mountain. This road approximately follows the boundary between the Six Rivers and Shasta-Trinity NFs. At the Regional level, please specify which NF has the maintenance responsibility for which portions of this road. See Map 5 (which shows only this one road to be treated). See Map 7, which shows 1S23 among other roads to be treated. Was this road counted for both of these NF[rsquo]s? It is a main road and has not been maintained over

the years in the way that makes it safe. Some of the year, snow makes much of the road inaccessible, at elevations over 5000 feet. This road needs a high priority for repair and maintenance. Six Rivers/Mad River Fire does address some hazard emergencies on this road.

Please address this road at the Region 5 level.

Project Map 5

Why does Map 5 Six Rivers, fail to show the need to treat hazardous trees on main Road 29N30?

Matching MVUM and Project Map 7

Update the maps showing roads to be treated so that they match the current MVUM, and show all road numbers. The orange lines instead of the road makes it difficult to determine Plan. (see comments for North Zone, Map 7 for examples.)

Details Map 7- Shasta-Trinity

Examples of Maintenance Level 2 roads on Map 7, which should NOT be included in this Project:

28N26 along Prospect Creek- this road is entirely in a Riparian Reserve in a Tier 1 Key Watershed, as indicated on MVUM as [ldquo]seasonal[rdquo]

Spur 28N27C -orange on map with no number

Spurs 28N25 and 28N28- both are mid-level parallel road fragments

Spur 28N28A -orange on map with no number

Spur 30N29E- just leave it the way it is

Also others as described in my Comments on August Fire Restoration Phases 1 and 2.

Why is there no hazard tree removal for road 30N29, from intersection with state Hwy 36 and road 29N73? Since that portion is directly off the state highway, and is quite high use and in a WUI, one would expect that it be included.

Main Roads on Map 7 are:

30N29, 29N30, 1S23, 29N58, 1S14, 1S13, 29N32, 29N75, 29N28, 28N10, 1N12, 31N32, 2N07, and 29N35

Road 30N29 is a main road, but number is not shown.

Treatment of these roads is enough!

Trail 12W34 for OHVs and All Vehicles and Road 29N59

Clearing 300 feet around Trail 12W34 is not necessary, especially in the light of the low intensity fire there.

Since the balance of Road 29N59 from intersection with Trail 12W34 (40.355877, -123.202986) is not maintained as a level 2 road, please make that portion of 29N59 a Trail and put barriers at Bramlet Rd, 30N29, and at the other end, so large vehicles do not attempt the steep, rilled, rutted surface where there are very sensitive plants in a large patch of ultramafic soil. I believe this portion of 29N59, a constant source of erosion, is a Legacy Sediment Site. It could possibly become an extension of Trail 12W34?

#### Road 29N58

During this spring, 2022, I observed the 29N58 road during active logging and wish to bring to your attention the possibility that it may cause a landslide directly into the wild portion of the South Fork Trinity River or Rattlesnake Creek. Please have field crews examine the conditions there ASAP.

#### Road 29N76 Gates

Will you please consider gating the entire 29N76, since all of it is a Seasonal Road, according to the MVUM, (Motor Vehicle Use Map) open from 5/01 until 10/31 each year. At the present time, only the portion of 29N76 from its intersection with 29N75 to its intersection with 29N48 is gated, yet all of it is a [ldquo]seasonal[rdquo] road on the MVUM.

#### Legacy Sediment Sites

Please provide the list or table of these for the Project. It is more important to address these than to remove hazard trees because they are even more critical for safety of all.

#### Geology Analysis

There is none, and is critical. This is the means by which Riparian Reserves are determined. The cursory use of EEZs at obvious places where there is a pond or active watercourse does not replace the need for this detailed information.

Geology information is lacking and is needed to define areas to be added to Riparian Reserves.

If the Geology Report refers to [ldquo]benchy[rdquo] or [ldquo]slumping[rdquo], it may be indicating dormant landslides. These need to be identified in the field, entered into the EUI database, and defined as Riparian Reserves.

Please provide me with the contents of the EUI database for Smoky Creek Watershed and East Fork South Fork Trinity Watershed, in whatever form you can make it available.

#### Road Repair and Maintenance

Road repair and maintenance in this document is treated as a side project after trees are removed, [ldquo]road maintenance as needed[rdquo] [ldquo]on haul routes[rdquo] (please see request for definition above), implying that they might be slightly damaged by the tree removal operation and just need to be fixed up a little. This is not the case. The repairs as results of the fires, and ongoing maintenance is already evident, and is even a more critical safety issue than a hazardous tree falling. If done correctly beforehand, there is minimal need after trees are removed, but needs to be done BEFORE trees are removed.

Roads will be maintained as needed. This includes cleaning culverts, drains, ditches and cattleguards, and

grading road surfaces and reestablishing rolling dips and other drainage features of the roadbeds on haul routes within the project area.

#### 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 and 3 Roads are often un-needed and should not be included in this Project. They are usually low-use.

Clearly, the need for huge clusters of level 2 and 3 roads cannot be justified for future management, especially in the Tier 1 key watersheds, unless the FS can prove capable capacity of staff available to repair and maintain them. Over 10 years have been spent to get many of these roads in the condition to withstand winters. The FS has contracted out this work to very capable RCD crew on the Shasta-Trinity and some on the Six Rivers. It is time for the FS to educate a crew of their own since the work is increasing due to the fires.

#### Landings

With all the miles of roads, please justify any need for landings that are not on already-existing roads. And provide a map of their proposed locations and number. These can be sources of failure leading to sediment discharge just as a road can and need geologist review and supervision and enforcement, not just a list of Design Features and BMPs.

#### Trails

What are the small purple lines? Do they indicate a 600 foot swath if they are at a trailhead? I am glad if the FS excluded the balance of these non-motorized trails in this area for this project. Please clarify.

Scenic values are not addressed.

#### Cumulative Effects

All projects on both private and public lands must be considered in cumulative effects. The most obviously missing are the private sales on South Fork Mountain since the fires and the sales and projects by USFS included in the August Complex Restoration Projects, some of which have been implemented.

#### 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.

#### Data Gaps regarding Water Quality Erosional Risk Assessment

The Smoky Creek watershed is designated Tier 1 Key Watershed and considered key refugia, the cornerstones of most species conservation strategies. Although Watershed Analysis (WA) was prepared, the priority recommendations have been ignored. The WAs made clear that further work is needed to correct Riparian Reserve (RR) boundaries. Please see pages 7-8, -9, and -10 in East Fork and Smoky Creek WA. The geologist needs to do field based, slope stability assessments for all timber sales and salvage project specific activities, just like the state requires private timber companies to do. Unstable areas should not be harvested or salvage



logged but instead added to Riparian Reserve (RR) areas land base. This applies to any ground-disturbing activities including Hazard Tree Removal and certainly heavy equipment, landings, or temporary roads.

I am concerned with the Up-River portion of South Fork Trinity River (SFTR). I value my partnership with you to preserve and protect this beautiful, remote area for the enjoyment of current and future generations. As you know, the Up-River portion of the SFTR includes old forests and newer plantations, and the cool waters offer refugia for our salmon. These cool waters only exist in these upper reaches of the South Fork Trinity River and are critical for Upper Klamath and Trinity Spring Chinook that have recently been listed by the California Fish and Game commission. They require cool waters to be able to hold there during the summer months before spawning, in contrast to the Fall Chinook that migrate up in the Fall to spawn.

#### Hard Copy Requests

Thank you for providing the April 14 Draft BA, but to print it one needs a paid account with BOX. Please provide a hard copy.

I was not able to access the other documents added on April 5, April 8, or May 6. Please provide hard copies of these also. Mail to address given.

Furthermore, these piecemeal, belated documents appear to be in support of the EA, when they should be informing the EA. Please provide me with a hard copy of all future documents.

This Project seem to be impossibly big, and it is understandable that gathering all the needed analysis is almost impossible, or maybe is impossible. This is all the more reason to limit the Project. In Shasta-Trinity, limiting to maintenance level 4 and 5 roads, for example, would mean treating 39 miles of road. Specific level 3 roads could be added and possibly an EA would suffice, carefully written. Anything larger would require a full EIS.

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Please include a list of roads instead of just miles.

Roads on Maps

Both Six Rivers NF and Shasta-Trinity NF show road 1N23 as a road to be treated along the top of South Fork Mountain. This road approximately follows the boundary between the Six Rivers and Shasta-Trinity NFs. At the Regional level, please specify which NF has the maintenance responsibility for which portions of this road. See Map 5 (which shows only this one road to be treated). See Map 7, which shows 1S23 among other roads to be treated. Was this road counted for both of these NF[squos]? It is a main road and has not been maintained over the years in the way that makes it safe. Some of the year, snow makes much of the road inaccessible, at elevations over 5000 feet. This road needs a high priority for repair and maintenance. Six Rivers/Mad River Fire does address some hazard emergencies on this road.

Please address this road at the Region 5 level.

Project Map 5

Why does Map 5 Six Rivers, fail to show the need to treat hazardous trees on main Road 29N30?

Matching MVUM and Project Map 7

Update the maps showing roads to be treated so that they match the current MVUM, and show all road numbers. The orange lines instead of the road makes it difficult to determine Plan. (see comments for North Zone, Map 7 for examples.)

Details Map 7- Shasta-Trinity

Examples of Maintenance Level 2 roads on Map 7, which should NOT be included in this Project:

28N26 along Prospect Creek- this road is entirely in a Riparian Reserve in a Tier 1 Key Watershed, as indicated on MVUM as [ldquo]seasonal[rdquo]

Spur 28N27C -orange on map with no number

Spurs 28N25 and 28N28- both are mid-level parallel road fragments

Spur 28N28A -orange on map with no number

Spur 30N29E- just leave it the way it is

Also others as described in my Comments on August Fire Restoration Phases 1 and 2.

Why is there no hazard tree removal for road 30N29, from intersection with state Hwy 36 and road 29N73? Since that portion is directly off the state highway, and is quite high use and in a WUI, one would expect that it be included.

Main Roads on Map 7 are:

30N29, 29N30, 1S23, 29N58, 1S14, 1S13, 29N32, 29N75, 29N28, 28N10, 1N12, 31N32, 2N07, and 29N35

Road 30N29 is a main road, but number is not shown.

Treatment of these roads is enough!

Trail 12W34 for OHVs and All Vehicles and Road 29N59

Clearing 300 feet around Trail 12W34 is not necessary, especially in the light of the low intensity fire there.

Since the balance of Road 29N59 from intersection with Trail 12W34 (40.355877, -123.202986) is not maintained as a level 2 road, please make that portion of 29N59 a Trail and put barriers at Bramlet Rd, 30N29, and at the other end, so large vehicles do not attempt the steep, rilled, rutted surface where there are very sensitive plants in a large patch of ultramafic soil. I believe this portion of 29N59, a constant source of erosion, is a Legacy Sediment Site. It could possibly become an extension of Trail 12W34?

Road 29N58

During this spring, 2022, I observed the 29N58 road during active logging and wish to bring to your attention the possibility that it may cause a landslide directly into the wild portion of the South Fork Trinity River or Rattlesnake Creek. Please have field crews examine the conditions there ASAP.

Road 29N76 Gates

Will you please consider gating the entire 29N76, since all of it is a Seasonal Road, according to the MVUM, (Motor Vehicle Use Map) open from 5/01 until 10/31 each year. At the present time, only the portion of 29N76 from its intersection with 29N75 to its intersection with 29N48 is gated, yet all of it is a [ldquo]seasonal[rddquo] road on the MVUM.

Legacy Sediment Sites

Please provide the list or table of these for the Project. It is more important to address these than to remove hazard trees because they are even more critical for safety of all.

## Geology Analysis

There is none, and is critical. This is the means by which Riparian Reserves are determined. The cursory use of EEZs at obvious places where there is a pond or active watercourse does not replace the need for this detailed information.

Geology information is lacking and is needed to define areas to be added to Riparian Reserves.

If the Geology Report refers to [ldquo]benchy[rdquo] or [ldquo]slumping[rdquo], it may be indicating dormant landslides. These need to be identified in the field, entered into the EUI database, and defined as Riparian Reserves.

Please provide me with the contents of the EUI database for Smoky Creek Watershed and East Fork South Fork Trinity Watershed, in whatever form you can make it available.

## Road Repair and Maintenance

Road repair and maintenance in this document is treated as a side project after trees are removed, [ldquo]road maintenance as needed[rdquo] [ldquo]on haul routes[rdquo] (please see request for definition above), implying that they might be slightly damaged by the tree removal operation and just need to be fixed up a little. This is not the case. The repairs as results of the fires, and ongoing maintenance is already evident, and is even a more critical safety issue than a hazardous tree falling. If done correctly beforehand, there is minimal need after trees are removed, but needs to be done BEFORE trees are removed.

Roads will be maintained as needed. This includes cleaning culverts, drains, ditches and cattleguards, and grading road surfaces and reestablishing rolling dips and other drainage features of the roadbeds on haul routes within the project area.

## 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 and 3 Roads are often un-needed and should not be included in this Project. They are usually low-use.

Clearly, the need for huge clusters of level 2 and 3 roads cannot be justified for future management, especially in the Tier 1 key watersheds, unless the FS can prove capable capacity of staff available to repair and maintain them. Over 10 years have been spent to get many of these roads in the condition to withstand winters. The FS has contracted out this work to very capable RCD crew on the Shasta-Trinity and some on the Six Rivers. It is time for the FS to educate a crew of their own since the work is increasing due to the fires.

## Landings

With all the miles of roads, please justify any need for landings that are not on already-existing roads. And provide a map of their proposed locations and number. These can be sources of failure leading to sediment discharge just as a road can and need geologist review and supervision and enforcement, not just a list of Design Features and BMPs.

## Trails



What are the small purple lines? Do they indicate a 600 foot swath if they are at a trailhead? I am glad if the FS excluded the balance of these non-motorized trails in this area for this project. Please clarify.

Scenic values are not addressed.

#### Cumulative Effects

All projects on both private and public lands must be considered in cumulative effects. The most obviously missing are the private sales on South Fork Mountain since the fires and the sales and projects by USFS included in the August Complex Restoration Projects, some of which have been implemented.

#### 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.

#### Data Gaps regarding Water Quality Erosional Risk Assessment

The Smoky Creek watershed is designated Tier 1 Key Watershed and considered key refugia, the cornerstones of most species conservation strategies. Although Watershed Analysis (WA) was prepared, the priority recommendations have been ignored. The WAs made clear that further work is needed to correct Riparian Reserve (RR) boundaries. Please see pages 7-8, -9, and -10 in East Fork and Smoky Creek WA. The geologist needs to do field based, slope stability assessments for all timber sales and salvage project specific activities, just like the state requires private timber companies to do. Unstable areas should not be harvested or salvage logged but instead added to Riparian Reserve (RR) areas land base. This applies to any ground-disturbing activities including Hazard Tree Removal and certainly heavy equipment, landings, or temporary roads.

I am concerned with the Up-River portion of South Fork Trinity River (SFTR). I value my partnership with you to preserve and protect this beautiful, remote area for the enjoyment of current and future generations. As you know, the Up-River portion of the SFTR includes old forests and newer plantations, and the cool waters offer refugia for our salmon. These cool waters only exist in these upper reaches of the South Fork Trinity River and are critical for Upper Klamath and Trinity Spring Chinook that have recently been listed by the California Fish and Game commission. They require cool waters to be able to hold there during the summer months before spawning, in contrast to the Fall Chinook that migrate up in the Fall to spawn.

#### Hard Copy Requests

Thank you for providing the April 14 Draft BA, but to print it one needs a paid account with BOX. Please provide a hard copy.

I was not able to access the other documents added on April 5, April 8, or May 6. Please provide hard copies of these also. Mail to address given.

Furthermore, these piecemeal, belated documents appear to be in support of the EA, when they should be informing the EA. Please provide me with a hard copy of all future documents.

This Project seem to be impossibly big, and it is understandable that gathering all the needed analysis is almost impossible, or maybe is impossible. This is all the more reason to limit the Project. In Shasta-Trinity, limiting to maintenance level 4 and 5 roads, for example, would mean treating 39 miles of road. Specific level 3 roads could be added and possibly an EA would suffice, carefully written. Anything larger would require a full EIS.