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Title:

Comments: Attached please find our comments-6 pages

Thanks,

South Fork Trinity Up-River Friends

South Fork Trinity Up-River Friends 07-06-21

August Fire Project-Ph 1

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<https://cara.ecosystem-management.org/Public/Commentinput?project=59545>

Preliminary EA/FONSI and Draft Specialist Reports Comments-

Thank you for the opportunity to comment on the Preliminary EA and we hope these comments are helpful.

We are concerned with the Up-River portion of South Fork Trinity River (SFTR). We value our 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 as "endangered.". 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.

Choice of Alternative

We favor Alternative 2, with modifications. We do not believe the Preliminary EA has justified the Preferred Alternative. The natural recovery of the area is best. Repairs and restoration to the recreation areas will make them useable and safe for our use. Protecting and improving watershed conditions should be the primary purpose of August Fire Restoration Phase 1. Salvage logging the area will not improve conditions, but will have unacceptable negative impacts.

The modifications needed are specifying main roads and specifying Riparian Reserves (RR). Also individually marking trees that are a hazard.

We Appreciate Maps

Providing the Map on 7-1-21 showing Units/Numbers was very helpful. A similar Map showing Alternative 2

would be very helpful, but including contour or topo layer.

#### Riparian Reserves

Alternative 2 must be modified to eliminate Roadside Hazard Tree cutting in Riparian Reserves (RR). These RR need to be field verified and mapped, as required before any ground-disturbing activities. If any Landings are proposed for Alternative 2, such as the 25 estimated in the Preliminary EA, please provide a Map of these, and size.

As part of the Final EA or EIS, please provide a map of the RR, including a layer for contours or topo lines. Also show Equipment Exclusion Zones (EEZs).

On Map of 7-1-21, it appears that Units 56, 57, 45, and 52 are in RR. Also the extensive Units 29, 30, 31, 32, and 33 are all in RR,

#### Geology/Geomorphology

Erosional risk needs specific assessment, as the Preliminary EA and Specialist Reports do not evaluate site-specific geomorphic risk areas. The Soils/Geology Report is incomplete. The Soils analysis is well done, complete with Soils mapping that is field verified. The Geology Section of that Report only gives generalizations about the types of geology found in the Project Area.

Only the active landslide in the Forest Glen Area was addressed. Then the statement that an engineering solution is needed, but no engineer on the ID team.

There are other known active and dormant landslides as referenced in other FS documents. Completing the required mapping of all the unstable areas will result in specifying RR.

All areas with project action need field-evaluation for slope stability and entered into databases. The Soil/Geology Resource Effects Analysis on page 4 indicates that field data are collected primarily adjacent to roads, and gives formal data sources that are known to have missing DATA GAPS, as described in the Watershed Analysis. Then there is the paragraph entitled "Incomplete and Unavailable Information." We again refer you to pages 7-8, -9, and -10 in East Fork/Smoky Creek Watershed Analysis. This is an opportunity to supply specific information.

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 areas land base. This applies to any ground-disturbing activities including Hazard Tree Removal that is not an imminent threat.

#### Roads and Road Maintenance Levels

Alternative 2 must include only main roads.

Main roads need only include Roads numbered on the 7-1-21 Map of Units. On the Red Mountain Unit, these Roads are: FS 35, 41, 30, and 29 (30N29-Bramlet Road), which has no number shown. On Forest Glen Unit, these roads are State Hwy 36 and FS Rd 14, although there are several other indications of roadside hazard, probably 1S26.

We do not understand how 2 miles of temporary new roads are needed to remove imminent roadside hazard trees along main roads. And opening closed roads in order to remove roadside hazards does not benefit the public, nor the watersheds.

Because the lightning fires of 2020 were a major event, we believe that the temporary closure of lower maintenance level roads is a necessary inconvenience.

#### Evaluate Need for roads

As managers of our forests, usually a RAP is done every 10 years or so. This would be an opportunity to evaluate condition and need.

Close temporarily all non-main roads to prevent injury.

Use this season to evaluate the need and close un-needed roads, and consider the costs to maintain the ones to keep - instead of opening closed roads. Be realistic in costs and personnel available for maintenance and closures.

We request a Map showing the Road System, including a layer of contour or topo lines, and including all open roads, showing their maintenance level.

We request a Map showing Landings for any Alternatives still being considered.

Both Roads 29N30C and 29N76 need to be completely decommissioned and closed. They are unnecessary and are in unstable Riparian Reserves. Also helpful in reducing ERA.

29N76 is almost entirely in Riparian Reserves, as evidenced by the bent trees and swales, as well as observations by FS personnel, besides the fact it encompasses the Wildlife Corridor.

#### Individually Marking Roadside Hazard Trees

Instead of the currently marked areas defined by arrows, individually mark each dead tree that presents a hazard. There are different rules for hazard trees in RR. The proposed criteria are too broad and will cause too much bare ground unnecessarily.

#### Aerial Seeding

Please evaluate Aerial Seeding in the final EA or EIS. See [psw\\_gtr109/psw\\_gtr\\_97.pdf](#) entitled: Emergency Burn Rehabilitation: Cost, Risk, Effectiveness by Scott R. Miles, etc. It is from the Proceedings of the Symposium on Fire and Watershed Management published in a General Technical Report by the Pacific southwest Forest and Range Experiment Station. You can find it on Treesearch, and it is very short, but very pertinent, since the experiment took place in the Hayfork Ranger District in the South Fork Trinity River Watershed.

Perennial Mix or Annual Mix were used, and were most successful and cost effective to prevent soil erosion and discourage non-native invasive weeds. Timing is essential.

#### Wild and Scenic Rivers

The Specialist Report on Wild and Scenic Rivers only addresses the corridor on each side. It fails to state that the Creeks in the Project Areas above Forest Glen provide the waters to the "Wild" recommended portion. Without these waters and those of the Upper South Fork Trinity River, there would not be any River.

Please be aware that the Wild and Scenic Rivers Act requires that portions that are proposed for designation have even higher legal protection than those portions already designated.

## No Water Drafting Due to Water Shortage

Because of the elevated temperatures and the drought causing a water shortage affecting the watersheds in the upper South Fork Trinity River, not even a drop of water should be drafted for the purposes of dust abatement during summers of the next few years until flows return to cfs capable of affording such activities.

Even following BMP and taking less than 50% of water is not acceptable in the current situation. All water bodies above Hyampom cannot afford to lose a single drop until rains come.

Please provide an estimate of water needed for each of the Alternatives, the source, how it will be transported, and cost.

## Invasive Plants

Any removal of trees, even dead ones, 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. Please see Aerial Seeding in these Comments.

## Disposal of unmerchantable portions of Roadside Hazard Trees

Please make clear the proposed plan for disposal of materials that are unmerchantable. Lop and scatter or mastication for such a large volume presents future fire hazard beyond the amount that may help with soil erosion.

Developing a market for these would be helpful.

## Botany

The risk of weed introduction is related to the amount of soil disturbance. Please see Aerial Seeding in these comments.

## Wildlife Corridors

We here repeat our request made in our Scoping Comments:

Please see Appendix E, Map 16 Smoky Creek Dispersal Corridor. Please provide a map that shows what plans are being made in this Corridor.

Here is an excerpt from Regional NW For Conservation Strategy -ACS Objectives - What is working:

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.

## Visual

Where is Seven Up Trail? Is it a vantage point for seeing the Smoky or Prospect Creek watersheds. We know of Seven Up Cedars, but no trail by that name. Google found one in the Trinity Alps.

Thank You

We respectfully submit these comments in hopes that they promote good decisions in these designated Tier 1 Key Watersheds that we have spent much time observing and enjoying. And we look forward to enjoying watching natural new growth and adaptation. Having the use of the 3 Forest Glen campgrounds once again will be a treat.

Sincerely,

South Fork Trinity Up-River Friends

Attachments: Example of Map showing Landings