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First name: Bruce

Last name: Campbell

Organization:

Title:

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Shasta-Trinity National Forest

c/o Keli McElroy

3644 Avtech Parkway

Redding, CA 96002

Dear Ms. McElroy and to whom it may concern at the Shasta-Trinity Nat'l Forest and beyond,

Thanks for accepting these comments regarding Phase 1 of the August Fire Restoration Project. I am concerned that a true cumulative impact studies would conclude that there would be increased sedimentation from proposed activities both from Phase 1 and from the more nebulous Phase 2 of the project. Please analyze this 2-phased project as a single project since it is the one river Trinity (and then into the Klamath) which will receive the gravitational fruits which lots of roading, logging, landing and heavy equipment use has on the South Fork Trinity River and its tributaries even within the designated National Wild and Scenic River segment areas of the watershed - namely lots of sediment into tributary streams and the Wild & Scenic South Fork Trinity River from post-fire logging and roading.

I am particularly appalled by the 3rd bullet point under Purpose and Need for the AFRP, yet at least you divulged it since it indicates the impetus behind the project.

"Where feasible to achieve restoration goals like reforestation and improved public safety, LEVERAGE COMMERCIAL TIMBER VALUE to facilitate product removal and reduce costs associated with restoration activities."

That is it in a nutshell. LOG the LARGE CONIFER TREES and act like it is because you've got to make money to be able to then do some perhaps actual restoration activities. This is greed pure and simple, is an insult to habitat for listed species, and is the kind of forest practice that has helped make California timberlands a tinderbox.

I am also appalled, though not too surprised having followed forest practices for a few decades, in what is admitted in the "Tree Selection" under "3. Site Preparation for Reforestation - Heavy Fuels" on page 5. "STANDING DEAD TREES, GENERALLY 14 INCHES IN DIAMETER AT BREAST-HEIGHT OR GREATER would be considered for REMOVAL using Fire Injured Tree Guidelines."

The following paragraph has a disjointed first (sort of) sentence in regards to hazard trees adjacent to private inholdings and forest roads. Then the next (an actual) sentence says "Trees would be felled to abate the hazard." Then it says, "COMMERCIALLY VIABLE TREES WOULD BE REMOVED". I notice that all 900 miles of road within the project area are proposed for so-called hazard tree logging is that just under Alternative 2(?), and hey take commercially viable trees to help fund removing alleged hazard trees even though hardly anyone travels on some of these obscure roads. This indicates that so-called hazard trees are simply another excuse to, surprise - it is already quoted in this very paragraph, yep, "COMMERCIALLY VIABLE TREES WOULD BE REMOVED."

The EA fails to adequately analyze in regards to the ongoing water flow from ancient forest plumbing systems

which help provide ongoing cooler water even during severe droughts such as this year. Yet these same trees with the intricate plumbing system providing quality as well as supplementing quantity of water are precisely the ones that would "BE REMOVED".

So it appears that even for an area with "heavy fuels", there is no indication as to what may happen to trees less than 14 inches in diameter. It does indicate under Tree Selection that "If vegetation is not merchantable, in an area lacking in coarse woody debris, or are within the Riparian Reserves, the tree would be felled and left on site." So for 14 inches in diameter and greater trees, loggers are supposedly paying attention to the pertinent guidelines. It appears that small diameter trees would be felled and left on site while some may be burned. The small-diameter trees are generally highly flammable slash which could then help a fire take over and devastate a nearby community or a nearby late-successional reserve. This clearly indicates this alleged restoration project is essentially a commercial timber sale (and re-planting) posing as whatever acronym or lingo is used to manipulate public opinion or federal dollars these days.

I applaud the "manual (conifer) release" mentioned in part of the formal documentation for this AFRP since it is far preferable to use of herbicides. But I am disturbed by the term "protection measures" which can be applied to "minimize deer and rabbit-browsing". Are these so-called "protection measures" actually rodenticide or rat poison or another (or mixture) of toxic materials?

In terms of presented alternatives, if you don't scrap the project more generally, then choose a very down-sized version of Alternative 2 logging only actually dead and actually "hazard" trees - rather than a broad assault to further fragment important public lands by clearcutting wider corridors along each road of the project site (plus proposing new and re-commissioned ones) to the tune of 922 acres in a sensitive area which is proposed to be part of a formal "recovery area". I'm referring to the "Mad River / South Fork Trinity River Restoration Area" proposed in Congressman Huffman's bill, a bill which passed the U.S. House of Representatives and has become part of Senator Padilla's PUBLIC Lands Act yet to be acted upon in the U.S. Senate to my knowledge.

Is there any respect for Riparian Reserve and endangered species legislation? Logging and mass roading and disturbances as a pattern within Riparian Reserves within the project area, but then somehow upon replanting, somehow the temperature of tributary streams is supposed to go back to historic measurements(?)

How will extensive tractor logging impact the range of species in the area from mycorrhizal fungi to listed species in so-called "regeneration" of the area?

There can be thoroughly thought out shaded fuel breaks in parts of the area, but generally the community safety component of the project should focus on more specific direct things to do such as residential hardening and defensible space in the vicinity of Forest Glen.

Just last month, the Klamath-Trinity Spring Chinook salmon was added to the California Endangered Species Act list in the "endangered" category. Chinook salmon and steelhead are federally-listed as "threatened". There is inadequate analysis in the documentation as to how the temperature of the river will become cooler again despite the plethora of activities proposed in what scientists consider generally ecologically sensitive area following substantial fire activity.

KEY POINTS springing from WILD & SCENIC RIVERS section of the documentation for the August Fire Recovery Plan

I will now bring up some points which spring from the "August Fire Restoration Project Wild and Scenic Rivers (Draft) document prepared by Joseph Rodarme (Environmental Coordinator for the South Fork Management Unit

of the Shasta-Trinity National Forest) dated May 2021.

Let us note the last sentence of the first paragraph of the aforementioned document: "The Wild and Scenic Rivers Act requires the protection of ORVs in a designated WSR for the benefit of present and future generations." The designated Outstandingly Remarkable Value for the South Fork Trinity River is "Fish / Fisheries", and this "ORV for fisheries stems from its significance to anadromous fish, such as Chinook salmon." Given the endangered state of listed fish species, it appears that if one is to assure that this ORV is around in the long-term, there must be wise management which does not increase likelihood of fairly near-term further sedimentation of streams needed by anadromous fish species (including management which increases the likelihood of debris flows which not only would devastate anadromous fish habitat, but also could interfere with "free-flowing character" which is supposed to be assured in Wild and Scenic River segments). Also note that often "wise management" in wildland areas often involves letting nature proceed as it will in such areas.

Fisheries biologists have noted that the Klamath-Trinity Spring Chinook salmon is a unique genetic species and it was recently listed under the California Endangered Species Act as "endangered". To protect "present" generation, please do not carry out the multiple damaging activities proposed under the AFRP. To protect "future" generations (literally of humans as well as anadromous fish), there needs to be a focus on not allowing any fairly near future degradation which would result from proposed activities under the AFRP, but manage instead so that such there is no future degradation from management activities that could impact the endangered Spring Chinook salmon and other anadromous fish species. There must be only be very light management to allow for healing natural recovery processes to better kick in.

It is appalling that with all the stream mileage within the project area, only the designated Wild and Scenic River segment along the South Fork Trinity River will have management which avoids activity in the river/stream-bed and in the river/stream-bank area! Not even the much lengthier "eligible" W&SR segment noted in the documentation (South Fork Trinity River from Farley Creek to Cave Creek) would avoid detrimental riparian area management which results in reduced stream shading and thus increased temperatures despite being a 3.6 mile segment (vs. 0.39 mile segment which is WS&R-designated) with 2.49 miles of that being within the AFRP project area. Question - if a "Resource Protection Measure" is solely enacted for the small designated W & SR segment within the project area to protect ORV of the area (anadromous fisheries), would avoidance of such management in watercourse beds and watercourse banks elsewhere in riparian area along the SFTR and its tributaries also be considered a "resource protection measure"(?), and if so, why is such active management proposed which would further reduce shading of various watercourses in other parts of the project area including even the noted eligible segments of W&SR which are the segments ??

I note that the first "analysis indicator" identified under the "Resource Indicators and Measures" section in regards to the "Fisheries" Outstandingly Remarkable Value says that "Each river shall be managed to protect and enhance the outstandingly remarkable values" for which the segment was designated.

It is good to remind oneself that the 2nd analysis indicator "Water Quality" says: "Both water quality and quantity must be sufficient to protect river values." I shall remind you all that larger trees have intricate natural plumbing systems and tend to provide cool ongoing water to nearby streams including tributaries to the Wild and Scenic South Fork Trinity River. Thus in drought years (which tend to be most years these days) and with generally earlier snowmelt these days, it is sure helpful to have some old trees still providing ongoing water flow to tributaries and the South Fork Trinity River to keep the temperature at a survivable level for anadromous fish and amphibians. Yet your proposed projects is in hand-in-hand with those who seek to especially log valuable commercial conifers rather than do the management which could actually help habitat and recovery in the vicinity.

Under "Environmental Impacts", the claim is if the Proposed Project is carried out that "Water quality would not be adversely effected when compared to the alternatives and the current condition, as it would experience

benefits from stream shading and decreased sedimentation over time."

So, despite numerous activities proposed for the area, "any effects from the Proposed Action would not be changed in the short-term". Question: Is gravity in effect in the South Fork Trinity River watershed and project area as it seems to be in other watersheds of which I am familiar? Unless project components have reached an agreement with the Creator so that gravity is put "on hold" so that lots of activities can be pursued on the project site which will certainly greatly increase sedimentation to the watercourse, it is a preposterous claim that there will be no change in environmental impacts from a wide range of active management activities of the proposed project! It appears that a lawyer or timber manager, rather than fisheries biologists or hydrologists, wrote at least this portion of the AFRP documents.

Let us examine the claim under "Environmental Impacts" for the Proposed Action that "the Proposed Action will not cause stream temperatures to noticeably increase further". That claim is dependent essentially on cancelling gravity. Stream temperatures tend to be warmer than they should be generally these days, while clearly doing lots of management activities including up to the edge of the watercourse, plus felling some trees into the river (and all the erosion and sedimentation involved with various management activities) and more roading will further increase such temperatures threatening the designated Outstandingly Remarkable Value due to the obvious increase in erosion and sedimentation that follows such activities.

I notice that under "Environmental Impacts" for Alternative 2, there is an admission that "The loss of vegetation has reduced stream shading along the corridor". Yet the proposed action would remove a lot more vegetation from riparian areas including down to the edge of the watercourse, including logging some trees so that they become large woody debris in the river.

Other than sort of presuming that gravity can be cancelled and that perhaps temporary "bridge-homes" will be provided for threatened and endangered species of the South Fork Trinity watershed and its tributaries (as they are being provided to certain homeless populations these days), some of the more preposterous arguments in the documentation pertain to SCENIC CHARACTER for the Proposed Action. The first sentence of that section says that, "Minor localized short-term direct adverse effects would occur from management treatments during project implementation due to the presence of equipment, smoke, stumps, exposed soils, and cut and/or piled vegetation." Even from an urban perspective, acting like seeing land with a bunch of stumps and roads and slash just has "minor localized short-term direct adverse effects" shows some have been liquidating our forest heritage for too long. Hint: logging all or nearly all trees in a natural watershed is seriously uglifying the area about as much as possible, and majorly impacting the SCENIC CHARACTER in a negative way! It is admitted under "Scenic Character" section that "Ground disturbances, tree stumps, and trees felled and left in place would be noticeable in the short term." (At least the short term I would say.)

While that downplaying of impacts from intensive management activities is disturbing, the very next sentence is at least as preposterous since it says, "The removal of larger hazard trees along system roads and through treatment units would reduce hazards along open corridors and INCREASE VIEWS along these travel corridors, especially in those areas where a higher number of trees are removed." This sounds like there is someone prodding land managers of the STNF to log a higher number of trees because such activities "increase views". Indeed the view is "increased" in terms of a lot of trees being liquidated so that one is able to see further (and thus see various intensively managed lands from watercourses, roads, or other parts of the project area). But note under "Issues Addressed" that Issue 4 mentions "scenic integrity" as well as "scenic character". The one who lauded the "increased views" that would be visible if numerous management activities are carried out including in riparian areas not only has little "ethical" or "linguistic" character, but apparently is blind because tree and vegetation removal in riparian areas, within the natural burn mosaic, and alongside every road as planned under Alt. 2, is extremely ugly and thus not "scenic"!

I wish to point out that there at least two places in the document where Resource Protection Measures (RPM)

instead have the acronym "RMP". Obviously someone is quite used to Resource Management Plan lingo, and/or is not putting great thought into the document. I note under the "Cumulative Effects" section of ISSUE 2 - Water Quality, that despite some "project design features, Resource Protection Measures (RMPs) and Best Management Practices (BMPs), cumulative effects on this resource are not expected to be minimal". Do not proceed with proposed activities until there can be very minimal impacts on the sensitive and biologically diverse watersheds of the region.

Under ISSUE 3 - FREE-FLOWING CONDITION, and then under the Cumulative Effects section beneath Alternative 2 - Imminent Hazard Trees Only, it is again mentioned that though "project design features, Resource Protection Measures (RMPs) and Best Management Practices are supposedly integrated into the project, yet "cumulative effects on this resource are not expected to be minimal".

I do not swallow the claim that Phase 2 of the AFRP will not have impacts within the Wild & Scenic River corridor - include Phase 2 as part of this analysis, or withdraw the project.

I notice a claim under Issue 2 - Water Quality under Environmental Impacts under Proposed Action that "the Proposed Action will not cause stream temperatures to noticeably increase further, as live trees contributing to stream shading will not be removed as part of this project." This appears to be claiming that unless a tree may be an obvious hazard near a stream, that ZERO LIVE TREES PROVIDING STREAM SHADING WILL BE removed! I wish I could believe that - that whatever time of the morning, afternoon, or eve, any live tree that provides shade to streams will not be removed! Note that this appears to refer to streams in general rather than greatly narrow things down to the short designated W&SR segment and to the eligible segments (yet there will be considerable active management within riparian areas even of the eligible segments). If what you have claimed is the case, then make sure that ZERO REMOVAL OF LIVE TREES WHICH PROVIDE SHADE TO STREAMS at any time of the morning, afternoon, or evening is absolutely integral to any management guidance related to the so-called AFRP.

Thank you for your attention to these concerns and be in touch.

Sincerely yours,

Bruce Campbell