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Organization:

Title:

Comments: See attached comment letter

27 May 2026

Traci Zimmerlee, Forest Supervisor

Shasta Trinity National Forest

3644 Avtech Parkway

Redding, CA 96002

RE: Comments on the North Trinity County Community Risk Reduction Project

We are writing as owners of the 46-acre homestead property that straddles Mule Creek at the end of Rainer Road, immediately adjacent to the Johannsen's property in Section 18, also known as the historic Heath Ranch. We only recently received notice of this project and we appreciate the extension of the comment period which has allowed us to prepare these comments

We have been part of the joint ownership of this property since 1979, and our association with the property goes back to 1956. We have recently completed a fuel reduction treatment on 40 acres of our property partially funded through the National Resources Conservation Service. As landowners committed to long term stewardship of the Trinity forests, we generally welcome the Risk Reduction measures being undertaken in the North Trinity Community, and we congratulate the many local residents, agencies, and the USFS for moving rapidly to shape and implement this plan. We are also glad to see the retention of the large diameter trees, of which there are a good number adjacent to Mule Creek Road in Section 19, immediately adjacent to our property. We have

the following comments.

1. EA Pg 18: We support the use of safely managed broadcast burn treatments. In addition we want to support the recommendation made in the letter from the American Forest Resource Council to implement and fund a long term "maintenance plan and strategy as part of this NEPA process and to provide a streamlined process for implementation of the necessary fuel's treatments 10, 20 and 30 plus years after the initial project completion" We have done extensive fuel reduction on our own small acreage twice over the last 40 years and we understand how quickly the forest stands can become over dense without repeated treatment.

2. From our reading of the plan, we understand that there will no or very little application of herbicides in the treated areas. We strongly support avoiding herbicide use on public (and private) forest lands, in particular all forms of Glyphosate, and we urge the USFS to limit or exclude herbicide use in the long-term maintenance plan and strategy referenced above. We understand that the science related to herbicides/glyphosate is complex, however there is ample evidence that herbicides persist and have long term negative impacts, particularly on native plants and aquatic life. We know that USFS has recently increased use of glyphosate on other California Forests and we are concerned that this strategy will create unintended consequences that maybe be difficult to reverse. We can manage our forests without introducing these powerful and persistent chemical compounds.

3. In terms of operations, we request that additional consideration be given to the how removal of small to medium size trees will support the survival of larger trees in the near term. Based on our observation of fuel reduction already in progress in Section 19 adjacent to our property , as part of the Peak Fire Emergency Response, we are concerned that significant ground disturbance immediately adjacent to legacy trees (old growth) combined

with dramatic decrease in surrounding canopy may result in the decline and death of many of these significant trees. We request that the Environmental Assessment include additional detail regarding how operations will meet the goal of preserving these larger trees by avoiding direct damage to tree roots and providing the conditions for their future survival and continued growth.

4. Biological Resources: The Biological Evaluation does not include any assessment of impacts on the brook trout found in local streams, including Mule Creek. We request further information regarding the status of this species and an explanation of why it was excluded from consideration in the impact evaluation.

In addition, we have three comments related to Fuel Reduction activities immediately adjacent to our property.

5. We request that the USFS confirm that Fuel Reduction along Rainer Road and Mule Creek Road in Section 19 include thinning the dense stands adjacent to our property, including the dense stand occurring between Rainer Road and Mule Creek Road, which are also in close proximity to the overhead power line. Treating these areas will ensure that the fuel reduction on our property will be reinforced by fuel reduction on adjacent FS lands. Map C included in the North Trinity Project appears to include these areas but we would appreciate confirmation. See our map attached.

6. We request that at the completion of treatment work that the old road running from the south east corner of our property to Mule Creek Road be bladed and left in passable condition, and gated at Mule Creek Road to limit the access. This road was the former

County Road prior to construction of the Mule Creek Road, and is likely the original road serving the Heath Ranch and Rix Homestead. Leaving it in passable condition will provide enhanced fire access, and will provide a second escape route for us our immediate neighbors in Section 18.

7. Lastly, we want to make the FS aware that our water supply is drawn from a spring at the northeast corner of our property, immediately adjacent to USFS lands and Beaty & Company lands. We request that the FS carefully flag the seasonal drainage that feeds this spring and minimize disruption in that area.

We look forward to continuing our involvement in the North Trinity Community. Please add us to your outreach efforts for future meetings, notices and other activities. And if you have any questions regarding our comments and concern do not hesitate to reach out. Thanks again for your efforts to protect our forests and our communities.

Sincerely

Peter Waller

Carson Legree

Susi Marzuola