

Data Submitted (UTC 11): 6/16/2026 7:00:00 AM
First name: Pat
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Organization: Trinity Center Community Services District
Title: Chair
Comments: May 21, 2026

Shasta Trinity National Forest

ATTN: North Trinity Project

3644 Avtech Parkway

Redding, CA 96002

RE: North Trinity Community Risk Reduction Project scoping letter (File Code 1950)

The Trinity Center Community Service District (TCCSD) submitted comments on this project's scoping letter on December 13, 2024. The TCCSD supports the Purpose and Need of this proposed project as described in your notice soliciting public comments for the Environmental Assessment dated May 5, 2026. Specifically,

(1) Reduce hazardous fuels and increase safety near communities and critical ingress/egress routes.

- * Establish cooperative fuel management zones across land ownerships to improve strategic fire response.
- * Prioritize fuel reduction near communities and other values at risk, (e.g., telecommunications, power from transmission and distribution, etc.).
- * Address hazard trees and hazardous fuel loading along State Route (SR) 3, County, and National Forest System (NFS) roads that pose risks to public and emergency access.
- * Maintain and improve roads to support safe travel, project implementation, and fire suppression operations, and

(2) Improve forest health and resilience.

- * Reduce stand density and competition-related tree mortality through thinning, preserving habitat function and promoting resilient forest structure.
- * Reintroduce prescribed fire to restore its natural ecological role and reduce long-term fuel accumulation. Maintain and guide development of plantations toward diverse, resilient forest conditions.
- * Restore areas affected by the River Complex Fire, including site preparation, reforestation, and fuel reduction.
- * Improve forest health and user safety in developed recreation sites.

We are pleased to see that you addressed some of our concerns/suggestions. For example, you improved the emergency access from Lake Forest to Mule Creek Road (35N23Y) under the Peak Fire Emergency response project (Ranier Rd Long Canyon Harvests).

Our Scoping Response letter also identified the importance of getting the NEPA complete, through this EA, for the installation of the Bonanza King wildfire detection camera. We are pleased that the USFS finally recognized

that the most expedient process was to pull the camera from this EA and use a simple letter to-the-file. And we are pleased to say that the special use permit is being completed as we work on this letter.

We also want to acknowledge that the USFS references our North Trinity Lake Fuel Management Plan.

This is a very large and complex project, encompassing over 12,000 acres with a wide range of forest conditions and environmental constraints. It is our belief that the top priority should be to reduce hazardous fuels and increase safety near communities and critical ingress/egress routes.

We also strongly urge you to revisit the various prescriptions in the EA and align with the work that has been done by the Trinity County Collaborative Group enumerated in the Collaborate Strategy for Federal Land Management in Trinity County ("The White Paper") adopted by the Board of Supervisors of Trinity County (Resolution No. 2025-029) on May 20, 2025. By doing so, as discussed during the meeting on May 19, 2026, many of the concerns about the intensity of treatments outside of Northern Spotted Owl habitats would be greatly reduced while still meeting your stated purpose and need.

This excerpt from the White paper highlights the synergy between your Purpose and Need and the "White Paper".

Desired Conditions

Active federal land management leads to drought- and fire-resilient forest, safer communities, recreational opportunities, enhanced wildlife habitat, healthy watersheds and a consistent output of forest products. This ensures the long-term viability of local communities, economies and ecosystems that are dependent upon those resources. Projects should include management actions[hellip]

That said, there are a couple of specific items that the TCCSD would like to point out & suggest potential remedies:

The Scoping document identified a diameter limit of 24" for tree removal, but the EA has a 30" diameter limit. We would recommend reverting to the 24" limit that was scoped. There simply are not that many trees greater than 24" much less 30" and these larger trees are important to the overall forest health and resiliency.

Item 6 in our Scoping Response letter describes our concerns, as the local fire protection agency, about a large area just south of the Covington Mill community that appears in the draft EA as an area to be treated solely by prescribed fire, because it is too steep and inaccessible for mechanical treatment or hand cutting, piling and burning. This was discussed at the meeting on May 19, with descriptions of some possible "side boards" and precautions that would be employed in the "burn plan" and during implementation, but we continue to be very concerned. Please revisit this area abutting the community for the efficacy of using prescribed fire without any pre-treatment and include some measure of specificity in the EA to guide the implementation.

Landings: The EA would allow landings up to 1 acre in size, while the White Paper limits them to $\frac{14}{100}$ acre. On a recent (April 17) Trinity County Collaborative field trip with USFS staff to Ranier Road landing sizes were

discussed in great length. Operators described the need to sometimes have $\frac{1}{2}$ acre landings, but no one indicated that landings need to be 1 acre. That simply removes too much canopy and reduces too much shade. It will increase the brush response, creating a future fuels hazard. We would prefer to see landings limited to the $\frac{1}{4}$ acre in the White Paper, but also understand that there are circumstances that warrant $\frac{1}{2}$ acre in some places.

Best Regards,

Patrick Frost

Chair, Trinity Center Community Services District