Shasta Trinity National Forest **June 15, 2022**
Mount Shasta Ranger District
Emelia Barnum
Carolyn Napper

Re: South Fork Sacramento Public Safety and Forest Restoration Project Scoping

Thank you for the opportunity to comment on the scoping proposal for the Shasta Trinity National Forest (STNF) South Fork of the Sacramento project (Project). Mount Shasta Bioregional Ecology Center (MSBEC) was actively engaged in the field trips last summer and we have engaged our membership, as well as the community at large, to better understand what issues the local community may have with this project. As we are deemed part of the South Fork Collaborative Group, we believe our Local Ecological Knowledge is an important voice to consider in developing the upcoming environmental document.

We understand the complexities of projects of this size and due to the variety and types of treatments, we will break our comments into two general sections. There are numerous components of this Project that we can support, but there are other components that we believe need clarifications, revisions, or redesigns.

What we support given proper caution and further considerations:

- Meadow and oak restoration: As long-standing partners with STNF, MSBEC has worked to protect the fragile meadow habitat of Panther Meadow on Mount Shasta. We support the removal of conifers from meadow habitat and we would urge the consideration of using non-commercial techniques with the lowest ground disturbance potential. We also value oak habitat restoration where conifers are removed from oak stands. From the sites we visited, it would appear that tracked felling machines could be utilized to reduce ground disturbance. We support using the lightest touch available to reach the desired habitat in oak stands.
- Trail maintenance and development: We cautiously support expanding recreational opportunities within the project area. We appreciate efforts to develop new trails and design new trails to link up with historical trail systems in the forest. We have concerns about the funding of new trail construction as well as current and future maintenance of the trail systems. We are also concerned that this project has a primary focus of public safety yet seeks to greatly expand the public use of the area. Human are identified as one of the main causes of fires in the project area. There needs to be better education, outreach, and enforcement of the current areas and a robust expansion of those prevention methods if the project goes forward.
- Hardening and consolidation of dispersed camping sites: We support efforts to reduce dispersed camping in areas that have recently seen high use and encroachment that is causing local degradation of resources. The expanded use of camping in this area has beaten down larger and larger footprints in many primitive campsites. Continued dispersal into new areas is creating unmanaged user-created campsites in areas that are unsuitable as high use areas. Any efforts made to harden existing sites and remove

damaging, user-created sites will improve forest health, reduce sedimentation to the river, and consolidate camping in appropriate areas. We are concerned that some of these efforts will simply push users further from the improved areas and cause another wave of user created primitive sites, so we urge that enforcement must accompany this aspect of the plan.

- Development, improvement, and expansion of camping sites: We recognize the sensitivity our community has to the idea of a large campground with RV spaces at the former "Buddha Hole". We have heard from many people that the planned development is too large. We do believe that to prevent traffic jams or evacuation issues higher up South Fork Road, opportunities for RV camping lower in the watershed could help. We support any opportunity to improve access for users with special needs. We would urge that some sites be available for low income users to increase inclusivity in our National Forests.
- Protecting Port Orford Cedar (POC) Stands from pathogens: We value the work previously done by STNF to remove the Phytophthora lateralis from POC stands in the South Fork drainage. We value the continued efforts to reduce transmission of the pathogen. We believe the road system and road drainage systems should be assessed and unneeded roads be decommissioned wherever POC is present. Any roads with wet crossings need to be prioritized for installation of drainage structures or removed from the road network entirely. We question the Design Feature of removing POC to the extent described. Since POC is normally associated with water, we believe addressing road drainage structures should be prioritized over the stated Roadside Sanitation.
- Improving road conditions to minimize erosion: We value any efforts to address poorly maintained, unused, or unneeded roads. An employee of MSBEC has previously collected extensive road inventory and analysis data in the area under a STNF contract. That data should be used to categorize roads for decommissioning. There are numerous, virtually undrivable roads with wet crossings that should be prioritized for crossing improvement or removal from the road network. We do not support the construction on new roads.
- Renewing Special Use Permits (SUPs): We are aware that many SUPs in the Project area have not been renewed recently. We believe that any SUPs that have not been recently renewed in the area should undergo a full re-permitting process with a current SUP analysis protocol in order to determine compatibility within the project boundary and the potential for negative impacts of incursions into delicate ecosystems.
- Thinning overstocked plantations: The plantations in the area have received very little attention in decades and are in poor condition. We support efforts to thin overstocked plantations.
- Prescribed Fire: We support the reintroduction of fire to the landscape, but acknowledge the risk involved. With the understanding that a massive reduction in fuels is first required before reintroducing fire, we do have concerns of the use of fire near Northern Spotted Owl (NSO) sites. Ground based disturbance near nesting sites can force animals to vacate nests. Special consideration must be given so smoke from prescribed fire does not jeopardize the health of owls in the area. We believe the use of

dozer lines should be minimized or eliminated in favor of handline, wetline, and the use of existing roads and trails.

Increasing recreational opportunities in this area should wherever possible, retain the visual forested character that draws people to this area. We do not believe that industrially logged landscapes will provide or enhance the recreation of the area. In fact, we are certain that there is little to no support from our membership for the amount and types of logging that is being proposed. Our support for expanding recreational opportunities comes with the caveat that we cannot support industrial logging in this area, and we have great concern that visual forested character will be eliminated for the sake of timber harvest.

What we don't support:

- Large scale logging disguised as fire resiliency: MSBEC has never supported large scale logging and we do not support the level of logging that is targeted in this project. We do not think that public safety is best served by logging. We cannot support additional road building associated with industrial logging. We cannot support the construction of landings associated with logging. We add that forest fires are always a threat in the National Forest, as are narrow roads and high traffic volume. We believe that there are alternative approaches to the FMZ on Castle Lake Road that could adequately address public safety. Alternatives like safety zones- Castle Lake itself or creating a larger clearing at the Old Nordic Center, could serve as evacuation safety areas, if they were treated as evacuation areas. The road to Castle Lake is a popular cycling route and members of the public have been disappointed to hear that the vegetation that shades the road would be substantially reduced. The area is also used by backcountry skiers including what is known as "Left Peak" (looking at Castle Lake from the parking lot, "Left Peak" is the summit to the left of the lake). It is consequential avalanche terrain where storm driven natural release cycles are common and skier-triggered avalanches are probable. We suspect that "Left Peak" and the ridgeline that comprises the south-eastern border will have increased avalanche danger as a result of the proposed treatment. The consequences of large-scale logging for fire resiliency can have a detrimental effect on recreation opportunities and public safety, so further analysis should discuss these effects.
- Basal areas of 60-80, where the largest trees are planned for removal: This forestry metric for the sparseness of a forest post-treatment is not a metric well-understood by the public. We would like to see an explanation that uses trees per acre or additional explanations made so that the public understands how trees are targeted for harvest. We see increased risk to forest health by reducing canopy cover to 60-80 basal area. Opening of the forest canopy creates drier duff layers and soil horizons, potentially increasing fire severity in wind-driven fire events. Dry soil horizons disrupt the water table, potentially directly effecting Castle Lake and decades of science produced by the Limnology Lab. We cannot support treatments that justify removal of large trees for fire resiliency. Large trees are the most fire resilient. While we understand that some large trees will be cut, we maintain that all treatments, wherever possible, should retain the largest trees in the stands. If this area is to be managed for recreation, for its visual

character, for fire resiliency, and to attract future generations of visitors to the area, then the largest trees are unarguable the most desirable attribute that we could ask these forests to offer to future generations. How will the future character of the forest ever include large trees if logging specifically targets large trees?

- Planned activity within Northern Spotted Owl nesting sites: We are aware that one NSO pair in the area had eggs hatch for the first time since they have occupied their nesting site. Despite "sub-optimal" conditions, as communicated on one of the field trips, and several failed breeding attempts, this pair has beaten the odds. We believe the buffer around this pair should be increased and the treatments minimized. Because of the sensitivity of the avian respiratory system, prescribed fire should not be considered near the nesting site. Given the focus of enhancing visitor opportunities to enjoy this area, every effort should be made to protect the wildlife that uses this area. We believe that the Biologic Assessment process for NSO should be made public (locations could be obscured), in order for the public to participate in understanding what level of protections NSO using the area are being given by both the Forest Service and US Fish and Wildlife. NSO populations have plummeted throughout their historic range despite the protections of the ESA. We cannot simply turn our focus to public safety as a justification for treatments that further imperil NSO recovery in this area.
- Incursion into the Castle Crags Inventoried Roadless Area (IRA): We identified that a portion of the Castle Crags IRA is classified as "allowing road construction and reconstruction", but we cannot support road building or dozer lines being added to this boundary between STNF, Castle Crags IRA, and Castle Crags Wilderness.
- MSBEC has a history of opposing biomass and cogeneration in this region. We cannot support any part of the plan that exports "biomass" for heating or electrical generation. Biomass and Cogeneration pollutes the air with particulate and contributes high levels of Carbon Dioxide per Kilowatt of power generated. MSBEC would support opportunities for personal woodcutting for firewood to be used regionally.

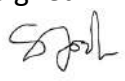
For this project to be successful, we believe that substantive public concerns need to be heard and multiple alternatives considered. Our community has long supported recreation in the project area, yet much of the public is concerned about overuse of the area. We believe that enhancing the recreational opportunities, increasing opportunities for special needs visitors, and becoming more inclusive for lower income visitors should be a central focus of the recreation component of the environmental document. We also believe that attempting to increase the carrying capacity for more recreation visitors in the project area could bring further damage and risk to the resources. The public has typically supported the expansion of recreational usage that has benefited the local economy, however with such a large project these positive impacts can be overshadowed by negative ones. There is realistic potential of negative impacts on local infrastructure and the quality of life of local residents; including, but not limited to, increases in traffic, litter/graffiti, unintended fire danger, and crime. Support generated by groups with very narrow missions may act to pad the appearance that their membership has fully understood every element of the plan. We do not feel that the narrowing of messaging to target special interest groups will ultimately reduce the outcry over the planned logging activities. We appreciate the efforts made so far to inform the public but worry

that efforts to garner support have taken an approach that seems to avoid addressing how industrial logging will alter the landscape.

Our ecological concerns in many parts of this scoping document are based on questions that we hope are addressed in the environmental document. The area represents a truly unique habitat for TES plants and animals. There is a distinct opportunity to do forest “restoration” in specific areas and we hope that the opportunity is not lost because of the financial costs associated with true restoration. Administering industrial timber sales not only costs the the Forest Service, but also burden taxpayers with the unrepresented and unrealized long-term costs of logging. We do not believe that restoration occurs with large logging operations. We are not willing to carry messaging to the public that asserts that logging is restoration as it goes against our mission, vision, and values.

We appreciate your considerations of our comments and hope that opportunities for true collaboration and meaningful partnerships will grow out of an open and honest planning process. MSBEC, as the oldest non-profit organization in Siskiyou County, has shown throughout our history, our willingness to engage with all stakeholders during the development of projects. We believe that successful projects will show what is possible when everyone gets to participate. We look forward to future work with STNF and all stakeholders to make this a successful project.

Signed



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