November 17, 2025

Shasta-Trinity National Forest
Forest Supervisor
Rachel Birkey

Six Rivers National Forest
Acting Forest Supervisor
Kathy Allen

Sent via email to: bobbie.miller@usda.gov , comments-pacificsouthwest-shasta-trinity@usda.gov, tara.jones@usda.gov and to nolan.colegrove@usda.gov

RE: Big Ranch Community Risk Reduction Project Scoping

Dear Supervisor Birkey, Acting Supervisor Smith and Big Ranch planning team,

Please accept these scoping comments for the Big Ranch Project on behalf of the Environmental Protection Information Center, the Klamath Forest Alliance, the Northcoast Environmental Center, Safe Alternatives for our Forest Environment (S.A.F.E.) and the Klamath Siskiyou Wildlands Center. Our organizations represent over 55,000 members and supporters, who care deeply about protecting the wild places and rivers of California, particularly the Trinity River watersheds and the communities between Burnt Ranch and Big Bar.

The project area lies between both the Wild and Scenic Mainstem and South Fork Trinity Rivers. Both are 303(d) listed under the Clean Water Act as impaired for sediment with multiple beneficial uses and outstandingly remarkable values. Nearly the entirety of the project falls within the Corral Late Successional Reserve and a large portion of Critical Habitat for the Northern Spotted Owl. These watersheds have high biodiversity and play a critical role in Coho and Spring Chinook migration and survival. They contain multiple domestic water sources and are rich in cultural and living heritage.

The project, with 37,000 acres of logging, is proposed “to reduce the risks associated with high intensity wildfire and improve forest health and function through forest thinning, reduction of hazardous fuels, reforestation and prescribed fire.” In addition, the Forest Service

proposes to maintain treatment through reoccurring plantation thinning, removal of hazardous fuels, prescribed fire, and maintenance of existing fire lines. Approximately 34,300 acres are located within the Shasta-Trinity National Forest, with the remaining approximately 5,500 acres, on the Six Rivers National Forest.

To meet the needs described above, the Forests are developing prescriptions under three different treatment types: community risk reduction, forest health improvement, and maintenance. Community risk reduction treatments on **up to 7,000 acres** including *Shaded Fuel Management Zones.* The forest health improvement treatments, on **up to 30,000 acres,** are proposed to promote individual tree health, maintain or restore habitat diversity, and reduce the overall risk of high intensity wildfire. Maintenance treatments on **up to 40,000 acres** include *Prescribed Fire and Fuels Reduction, Plantation Thinning, Meadow Restoration* treatments.

The significant issues and extraordinary circumstances surrounding the logging of up to 37,000 acres, equivalent to 60 square miles, across this Late Successional Reserve landscape with all the subsequent landings, possible "temporary" roads and skid trail construction, reconstruction of Maintenance Level 1 roads, exorbitant number of Riparian Reserves, stream crossings, unstable areas and undisclosed amount of legacy sediment sites or controllable sediment discharge sources deserves an Environmental Impact Statement (EIS). At a minimum, the agency should provide an opportunity for public comment on the Draft Environmental Assessment (EA). The scoping notice lacks sufficient detail for the public to meaningfully participate in the decision-making process failing to meet the National Environmental Policy Act (NEPA) public participation requirements and intent of the Shasta-Trinity and Six Rivers Land Resource Management Plans.

INELIGIBLE USE OF EMERGENY SITUATION DETERMINATION

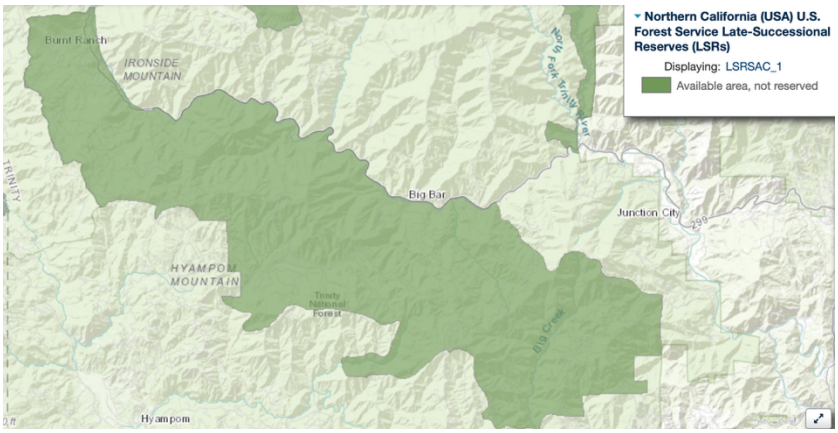
Because the Shasta-Trinity and Six Rivers National Forests are proposing management activities not consistent with the Six Rivers Forest Plan, the use of an emergency situation determination (ESD) is inappropriate. The Forest Service cannot use the ESD for the Big Ranch project because, as proposed, it is not consistent with the applicable Six Rivers Land Resource Management Plan. Section 40803 of the IIJA specifies that any authorized emergency action carried out under an ESD must "be conducted consistent with the applicable land and resource management plan." 16 U.S.C. § 6592c(b)(3). Under the National Forest Management Act ("NFMA") land and resource management plans ("forest plans") must be developed and maintained for each unit of the National Forest System, including the Six Rivers National Forest. 16 U.S.C. § 1604. Forest plans consist of management objectives, standards, guidelines, goals, and other plan components that govern Forest Service actions. 36 C.F.R. § 219.7(e). Individual Forest Service projects such as the Big Ranch project must be consistent with the applicable forest plan. 16 U.S.C. §1604(i).

The project, as proposed, is not consistent with the Six Rivers Forest Plan. The project's scoping letter identified a proposed site-specific amendment in order to implement logging on steep slopes up to 40 percent. Any project that requires a site-specific amendment to the forest plan is by definition not consistent with that forest plan. Therefore, the project is not consistent with the Six Rivers Forest Plan and is ineligible for the application of the ESD.

CORRAL LATE SUCCESSIONAL RESERVE

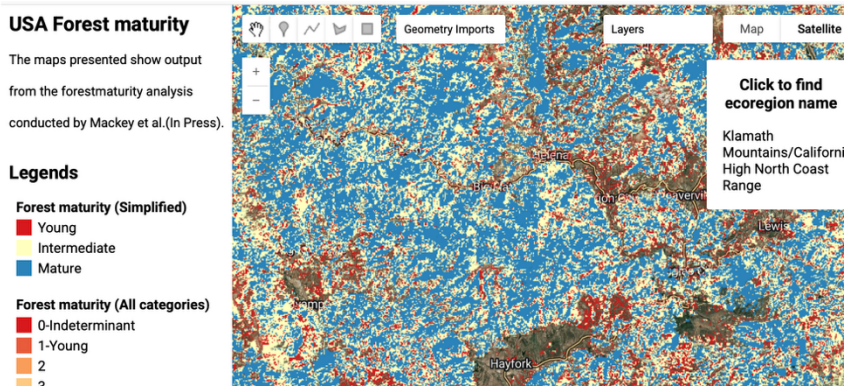
Literature supports conserving LSR's without logging to preserve biodiversity:

Late-successional forest communities are the result of a unique interaction of disturbance, regeneration, succession and climate that probably can never be created with management. At present, we do not even fully understand the structure, species composition, and function of these forests. The best we can hope to accomplish through silviculture is to at least partially restore or accelerate the development of some of the structural and compositional features of such forests. Because they will be regenerated by different processes during a different period from that of the existing late-successional forests, it is highly likely that a silviculturally created stand will look and function differently from current old stands that developed over the last 1,000 years. Consequently, conserving a network of natural old-growth stands is imperative for preserving biodiversity into the future. FEMAT IV-31,32.



Late seral forest stands provide delicate ecosystems and habitat for multiple species that are **dependent upon closed canopy forests**. Commercial logging as proposed within thousands of acres of native stands, which would include removing large fire resistant and mature co-dominant trees with late successional characteristics, would be contrary to protecting and enhancing late successional characteristics. This sheer amount of disturbance with heavy equipment throughout the Corral LSR would significantly alter late seral characteristics and may increase fire behavior. This is a significant issue.

The Burnt Ranch and Soldier Creek Watershed Analysis describe much of the project area, outside of plantations, as mature and old growth forest stands. This can be witnessed as well by [Forest Maturity mapping](https://www.matureforests.org/forest-maturity-map)[1].



[1]Dominick A. DellaSala, Brendan Mackey, Patrick Norman, Carly Campbell, Patrick J. Comer, Cyril F. Kormos, Heather Keith and Brendan Rogers (2022) Mature and Old-Growth Forests Contribute to Large-Scale Conservation Targets in the Conterminous USA. *Front. For. Glob. Change* doi: https://www.frontiersin.org/articles/10.3389/ffgc.2022.979528/full
https://www.matureforests.org/forest-maturity-map

It is not clear how recent fires and fire suppression efforts have affected the LSR or how much of the proposed logging is within natural stands or fire-affected landscapes. At a minimum, the agency should provide an opportunity for public comment on the Draft EA. The scoping notice lacks sufficient detail for meaningful engagement failing to meet NEPA's public participation requirements and the intent of the Shasta-Trinity Land Resource Management Plan (LRMP).

The desired future condition for LSR within the Trinity River and Corral Bottom Management Areas is described as late successional stands that are structurally diverse and often multiple storied stands. As proposed the project may eliminate multiple storied stands, exasperate habitat fragmentation in this already fragmented LSR and degrade habitat contrary to the Northwest Forest Plan, Shasta-Trinity and Six Rivers LRMP and the NSO Recovery Plan.

RIPARIAN RESERVES AND KEY WATERSHEDS

Some of the most productive, sensitive, and diverse sites on the Shasta-Trinity National Forest are within Riparian Reserves. Shasta-Trinity LRMP 3-17

Riparian areas provide important habitat for fish and other aquatic life-forms, as well as a variety of wildlife species, including the willow flycatcher, fisher and bald-eagle. Riparian areas have high wildlife values because of the close proximity of water and structural diversity of the vegetation. LRMP 3-17

Ecosystem management programs including wildlife and fisheries are emphasized while forest management that emphasis commercial product development and extraction, are not emphasized. LRMP pg. 3-18

Forest Service **activities and programs are intended to assist in the recovery of T&E species** and to avoid actions that may cause a species to become threatened or endangered. LRMP pg. 3-26

Current management direction is to provide a network of suitable habitat to include linkage in the form of dispersal habitat. **This is being fulfilled with the LSR and Riparian Reserve systems**. LRMP pg. 3-27

The willow flycatcher is a Region 5 sensitive species and a State listed threatened species. Current **management direction is to provide for population viability through the protection of habitat in the form of riparian habitat such as riparian management reserves** and wet meadows. LRMP pg. 3-27

There should be no commercial logging, mechanized equipment operation, excessive pruning or slash piling in Riparian Reserves (RRs), the focus for these areas should not be in fuels treatment, but allowing the accumulation of LWD and dense canopy in order to provide for undisturbed debris, hydrological services, natural processes, wildlife corridors, landscape connectivity and for lower stream temperatures to ensure the viability of aquatic life. Mechanical tree removal has proven to have deleterious effects on these critically sensitive areas.

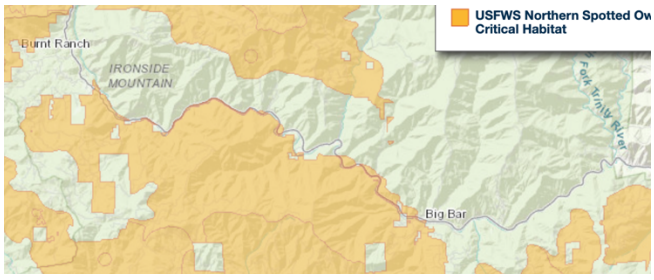
How many stream crossings, legacy sediment sites and/or unstable areas in the project area? What is being proposed in RR's and what is the total acreage and location of RR treatments? The South Fork Trinity River is a Key Watershed. How is restoration being prioritized? What is the current condition of each site-specific RR? How would habitat connectivity be affected? What aquatic species are present in the project area? How is the agency complying with the Federal Waiver Program? How is the agency following the Aquatic Conservation Strategy and its outlined buffer widths?

Riparian Reserves are ecologically critical, making this a significant issue for the project. The compounding issues and extraordinary circumstances warrant an EIS. At a minimum, the agency should provide an opportunity for public comment on the Draft EA. The scoping notice lacks sufficient detail for meaningful engagement in the decision-making process failing to meet NEPA's public participation requirements and intent of the Shasta-Trinity LRMP.

WILD AND SCENIC RIVERS

The project lies between the Wild and Scenic Mainstem and South Fork Trinity Rivers. Both river systems have multiple beneficial uses and outstandingly remarkable values that require consistence with the Wild and Scenic Rivers Act. How is the agency considering this significant issue and extraordinary circumstance? What are those values and how will the project effect these renowned and well-loved river systems? How is the agency incorporating the Wild and Scenic South Fork Trinity Management Plan? The agency should provide an opportunity for public comment on the Draft EA. The scoping notice lacks sufficient detail for meaningful engagement failing to meet the NEPA's public participation requirements.

NORTHERN SPOTTED OWL RECOVERY AND CRITICAL HABITAT



The Northern spotted owl *(Strix occidentalis caurina)* (NSO or *Strix*) is an umbrella species for hundreds of rare and increasingly threatened late-successional species. The Shasta-Trinity and Six Rivers National Forests have a duty to work towards recovery and to maintain and restore suitable NSO habitat, not only for the owl but also for mature and old-growth closed canopy dependent species. Neary the entirety of this project is within Critical Habitat. Connectivity for the dispersal of forest-dependent organisms decreases as fragmentation increases, resulting in the isolation of individuals and populations. The rate of successful dispersal of juvenile spotted owls decreases in fragmented landscapes, thus influencing long-term population viability (Swanson 2005[2]). Balancing the goals of LSRs to maintain populations (e.g., fishers, spotted owls) may require that the current LSR network be augmented with new priority areas in high-value habitat areas in the most productive low- to mid-elevation forests (Zielinski 2006[3]). All high value habitat must remain intact as NSO navigate fire and Barred owl invasion.

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[2] Swanson, Mark. Centuries of Change in Pacific Northwest Forests: Ecological Effects of Forest Simplification and Fragmentation. University of Washington College of Forest Resources Northwest Environmental Forum. Nov. 2005

[3] Zielinski, William J. et al., *Using landscape suitability models to reconcile conservation planning for two key forest predators,* Biological Conservation (2006), doi:10.1016/j.biocon.2006.07.003.

The current LSR and Critical Habitat network may not be enough to sustain NSO. The Strix is on a precipice of extinction and populations continue on a steep decline across the region. Recovery of the species is mandatory under the Endangered Species Act and the California Endangered Species Act, yet all Northern California Pacific Northwest national forests are proposing timber sales that remove, downgrade and degrade habitat and Critical Habitat across all Recovery Units.

We are very concerned with the extreme amount of disturbance and commercial logging across 40,000 acres in conjunction with all the other timber sales and future sales currently being planned across the region and Recovery Unit. Especially when the baseline habitat conditions and population numbers have not been adequately calculated or established. How many, when and what wildfires have affected the project area in the last decade? Has emergency consultation on fire suppression effects been completed for all of these recent wildfires? What has been the change in the baseline habitat condition? What are the cumulative effects from this project in addition to all the other sales being planned in this Recovery Unit? How many Activity Centers, reproductive owl pairs, occupied nest sites are there in the project area? Have surveys been completed to protocol? How much of and where is suitable Nesting, Roosting and Foraging habitat in the project area? What is being proposed and where? Are any "temporary" roads, landings or ML 1 roads being planned in suitable habitat, Critical Habitat or occupied Activity Centers? What Activity Centers are already deficient in habitat and by how much? What will the impacts be to prey species? How would the project effect Barred owl competition? How would the project effect habitat connectivity?

With NSO considered functionally extinct in Washington and most of Oregon, the Klamath and Coastal Recovery Units represent the last stronghold for the species, which may now be considered its last remaining source populations. All remaining suitable habitat, especially high value habitat, should remain untouched with no commercial logging. We also recommend a 24" DBH limit throughout the project area.

This extraordinary circumstance is a significant issue for the project, in which the objectives of the project are highly uncertain and scientifically controversial, requiring: an EIS; formal consultation with the US Fish and Wildlife Service and subsequent Biological Opinion; as well as a detailed cumulative effects analysis for the NSO. These should be provided prior to the close of public comment opportunities in conjunction with the Draft EA.

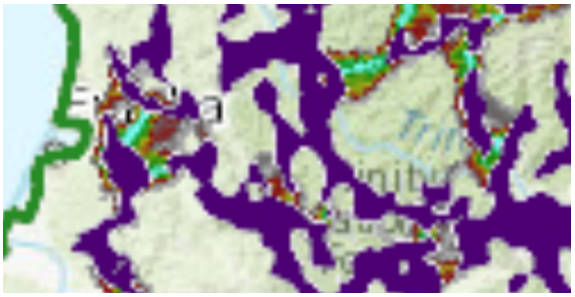
We are very concerned that the vast expanse of degradation would adversely affect the Strix and their prey species as well as encourage further Barred owl invasion. Our organizations and members could provide relevant information but cannot do so without the site-specific details outlined above, reiterating the need to allow for public comment on the Draft EA, Biological Assessment and Biological Opinion as intended by NEPA's public participation requirements.

WILDLIFE SPECIES

We are **very** concerned for Neotropical Migratory Birds and Forest Service Sensitive, Candidate, Survey and Manage and Management Indicator Species, including but not limited to the fisher,

marten, goshawk, northern red-legged frog, yellow-legged frog, northwestern pond turtle and the **endemic** Trinity Bristle snail (*Monadenia setosa*), *Monadenia churchi* and *Monadenia fidelis minor*. As required by the Six Rivers and Shasta-Trinity LRMP please provide: **survey information** for NSO, Pacific fisher, Northern goshawk, and other species; maps and management plans for the American goshawk, Pacific fisher and; survey information for special habitats and map of habitat types and areas.

American Goshawks have specific requirements and have a very high fidelity to their nest sites. How many goshawk areas are in the project area? Have there been adequate surveys? The Shasta-Trinity LRMP in Appendix L states, "A network of withdrawn areas **including LSR's** will provide adequate habitat for goshawks. **These stands will be managed to provide a dense, mature** coniferous forest." Throughout the LRMP, LSRA and Watershed Analysis for the Forests, there is emphasis on **how LSRs and Riparian Reserves will aid in the protection of wildlife.** The loss of late successional habitat and forest fragmentation is the greatest threat to species within these watersheds.



The proposed project would fragment and degrade important wildlife connectivity corridors given the possible "temporary" road construction, landings, skid trails and the opening and reconstruction of ML 1 roads as well as the vast amount of commercial logging. LSR's and RR's are meant to provide protection for many of these species that are threatened by habitat loss. Multiple ridges in the project area provide core habitat for fishers[4]. It is imperative to maintain dense forest canopy, well over 60%, for all late seral dependent species.

The western pond turtle should be surveyed for, as it is expected to be listed under the Endangered Species Act. There is also a great concern for the Foothill yellow-legged and Northern red-legged frog as well as multiple salamander species given the invasion of the Barred owl and its voracious predation on amphibians. Endemic Survey and Manage snail species are also of great concern, as even slight changes in microhabitat could have deleterious effects on these extremely rare species.[5]

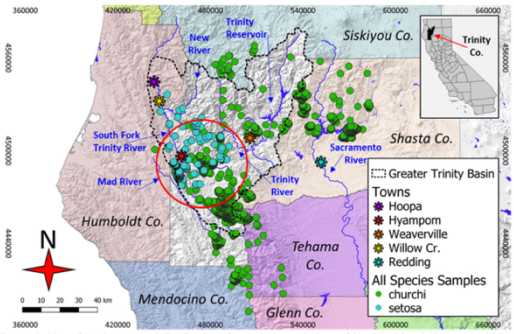


Figure 1. Map of study area and distribution of sampled populations of *M. churchi* and *M. setosa* within the Greater Trinity Basin, including the area of hypothesized co-occurrence (i.e., red circle). Included is a red colored buffer outline (radius ~20 km = 1,256.6 km^2 area) surrounding the hypothesized center of co-occurrence

[4] Spencer, W., J. Brice, D. DiPietro, J. Gallo, M. Reilly, H. Romsos. 2019. Habitat Connectivity for Fishers and Martens in the Klamath Basin Region of California and Oregon. Conservation Biology Institute. https://doi.org/10.6084/m9.figshare.8411909

[5] Sullivan, R. M. 2022. Microhabitat characteristics and management of the Trinity bristle snail in the Greater Trinity Basin of northern California. California Fish and Wildlife Journal 108:e3.

THREATENED AND ENDAGERED FISH AND AQUATIC SPECIES

The populations of several anadromous salmonid species present in the Trinity and South Fork Trinity Rivers and their tributaries are in severe decline. These tributaries are Evolutionarily Significant Units for the threatened population of coho salmon (*Oncorhynchus kisutch*) as well, the one of only two remaining populations of the unique and vital population of Klamath-Trinity River wild spring-run Chinook (*Oncorhynchus tshawytscha*), listed under the California Endangered Species Act (ESA) and are also Candidate species for listing under the Federal ESA. These rivers also harbor the Northern California Distinct Population Segment for Steelhead (*Oncorhynchus mykiss*). Further, these watersheds are a refuge for the denizens of these rivers, the pacific lamprey and green sturgeon. Fisheries are a significant issue and extraordinary circumstance for the Big Ranch project.

Effects of the proposed project on Federally-listed and Candidate wild salmon and designated critical habitat must be adequately considered and analyzed and given full consultation with NOAA. Accelerated erosion from land management, roads, and altered flows all affect migration, spawning, reproduction, and early development of cold-water fish such as coho and chinook salmon and steelhead trout in the river. The scoping notice lacks sufficient detail on the proposed 37,000 acres of logging with heavy ground-based machinery, extensive road use and construction and reconstruction of roads and landings, possible actions in countless RR's and disruption of legacy sediment sources et., on top of the 40,000 acres of burning. Please note that, Project Design Features (PDF's) and Best Management Practices (BMP's) are additive effects, not always implemented, not always effective and do not mitigate all impacts to water quality. The agency must not rely on these mitigations to offset these cumulative impacts and would be better to avoid or forgo entry into RR's, widespread commercial logging and road use, construction and reconstruction.

WATER QUALITY AND HYDROLOGY/GEOLOGY

Both the Trinity and South Fork Trinity Rivers are 3039(d) listed under the Clean Water Act as impaired for sediment. These impairments mean the river's water quality does not meet the standards necessary to protect its beneficial uses. The primary adverse impacts associated with excessive sediment in the Trinity River pertain to anadromous salmonid fish habitat. The Forest Service must show how it adheres to: the Clean Water Act; the Porter Cologne Act; the Federal Waiver and; all pertinent numeric targets in TMDL plans, Water Quality Control plans, Fisheries Management and Recovery plans, including the Five Counties Salmonid Conservation Program as well as associated; Monitoring and Assessment Programs and stakeholder engagement initiatives.

In addition to water quality objectives, the Basin Plan includes prohibitions specifically applicable to logging, construction, and other associated nonpoint source activities. Sediment source analysis from the plan and watershed analysis indicates that many of the tributaries in the project area have high percentages of legacy or management-related sediment delivery, compared to background, and consequently may be exhibiting a high risk of watershed

disturbance. Past analysis also indicates highly erodible soils in the project area. Logging and associated road building have dramatically altered aquatic habitats in the Trinity River basin. Intensive and widespread logging on the steep and unstable slopes of this region, combined with local geology, make them particularly prone to erosion following road development and timber harvest. The agency must prioritize reducing, avoiding and eliminating the impacts of sediment inputs from roads, logging and other activities into the Trinity River system, especially on public lands.

ROADS AND LANDINGS

Roads are the largest contributor of sediment into our rivers and streams, which are already impaired. How is the agency incorporating the 2010 Shasta-Trinity Motorized Travel Final EIS and the information from the Eltapom Creek & Corral Creek and Burn Ranch and Soldier Creek Watersheds Analysis? How much "temporary" road construction is proposed? How many new landings? How many stream crossings and legacy controllable sediment discharge sources are there in the project?

The widespread use, construction and reconstruction of roads and landings pose a significant risk of adverse cumulative effects to aquatic and terrestrial life as proposed project activities suggest. Please acknowledge the extreme wildlife, botanical and aquatic impacts from roads, "temporary" roads, ML 1 roads, landings and excessive skid trails. PDFs and BMPs are additive and do not erase the widespread deleterious effects of these actions. Do not rely on these mitigations to erase the cumulative impacts and provide a detailed cumulative effects analysis that is available for public comment consistent with NEPA public participation requirements.

LOGGING AND FIRE BEHAVIOR

Studies have shown that there is a very low probability that project areas will encounter wildfire before fuels recover to hazardous conditions.[6] Fuel-reduction treatments can reduce fire severity in the short term, but these treatments, by themselves, do little to effectively mitigate long-term dynamics of fire behavior, especially under severe weather conditions. The fires that thinning is designed to halt are driven by drought, high temperatures, low humidity and, most importantly, wind. Thinning—even when done properly—cannot halt extreme winds or embers, which blow through and over any amount of clearing. Defensible space adjacent to homes is the best defense.

The agency should not rely on all maintenance treatments occurring to determine long-term outcomes. Fire behavior models should be transparent and provided to the public with an opportunity to comment. Forest Service modeling is often skewed and static in time, which does not represent the fluctuations of forest changes and the resurgence of flammable vegetation after forest canopy is removed. Retaining large fire-resilient trees and keeping forest canopy maintains shade and keeps microclimates cooler. It is the easiest and cheapest way to control volatile brush in the long-term, reducing the need for costly and timely maintenance across entire watersheds.

[6] MM Boer, OF Price, RA Bradstock, Wildfires: Weigh policy effectiveness. *Science* **350**, 920 (2015). https://www.science.org/doi/10.1126/science.350.6263.920-a

BOTANY

The biodiversity and species richness in the project area is impressive, although Forest Service field surveys have not been thorough. We are very concerned with harm to Sensitive, rare and endemic and Survey and Manage species such as lichen and fungi, as much of the project are contains mature forests with complex structure. Standard minimal PDFs do little to assure that any of these sensitive, rare and/or late seral dependent plant populations would endure the extreme and vast disturbance across 60 square miles from commercial logging with heavy equipment in these fragile and biodiverse ecosystems. Habitat typing is not a surrogate for surveys. Have surveys been completed for all pertinent plant and fungi species? Where and how many know locations exist in the project area?

INVASIVE SPECIES

The high risk of the spread of noxious invasive plant species must adequately considered, especially in conjunction with the impacts to rare plants. The agency must acknowledge and consider this risk and the increased fire risk of invasive species establishment. Non-Native Invasive Species (NNIS) of plants are a severe threat to the project area resulting in loss of biodiversity, increased exposure of native species to disease and degradation of the ecosystem. Early recognition and removal of NNIS is extremely important to maintain intact ecosystems. One of the requirements contained in the FSM 2900 is for a determination of "the risk of introducing, establishing or spreading invasive species associated with any proposed action, as an integral component of project planning and analysis, and where necessary provide for alternatives or mitigation measures to **reduce or eliminate** that risk prior to project approval."

How many, what species and where are invasive plant species occurring? How would ground-based activities, road use and landing construction increase non-native plant species as research has documented. Ground disturbance has a great potential to establish and spread of nonnative plants. Areas with more canopy and undisturbed soils are less likely to be invaded[7].

TRIBAL CONSULTATION

The Forest Service must have robust and meaningful consultation with all affected Tribes, this includes the Tsnungwe, Chimariko Karuk, Yurok and Hoopa Valley Tribes. Have archeology surveys been completed? Has consultation with SHPO been initiated? These watersheds, rich in cultural and living history, are the lifeblood for many indigenous peoples.

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[7] Merriam, K.E., Keeley, J.E., and Beyers, J.L., 2007, *The role of fuel breaks in the invasion of nonnative plants:* U.S. Geological Survey Scientific Investigations Report 2006-5185, 69 p.

PUBLIC INVOLVEMENT

The Shasta-Trinity FEIS at III-12 states “Public involvement in the management of National Forest resources is desirable and actively encouraged.” At K-8, “Public involvement is a key element of the site-specific NEPA project planning process Publicly-provided information is often useful, and can be used by the interdisciplinary team during the analysis process for NEPA projects.: At K-9, “The Desired Future Condition will be further refined, with public involvement, at the watershed/project level.”

The 2014 Burnt Ranch project, done under an EIS, garnered interest from many Tribes and individuals, including members of our organizations. Have those interested people been included? Has the agency alerted all of the landowners? How has the Trinity County Collaborative been involved? Will their recommendations, which have been refined over decades of working with the Forest Service, be included in project planning? How will scoping comments be incorporated to meet NEPA public participation requirements.

RECCOMENDATIONS

Please consider these recommendations that would meet the purpose and need of the project and would dimmish harm to wildlife, water quality and all other forest resources:

Do not disturb High Value Habitat or NSO nest cores,

Retain trees >24” DBH,

Retain ACS buffer widths with no heavy equipment in Riparian Reserves,

Retain >80% forest canopy on North and East facing slopes and >60 on South and West slopes,

Forgo any “temporary” road and new landing construction,

Minimize the project to concentrate on thinning from below and/or shaded fuel breaks on roads, roaded ridgetops, plantations and around private inholdings,

Survey for NSO, goshawk, fisher, western pond turtle, yellow-legged frogs and plant, fungi, invertebrate and Survey and Manage species,

Minimize opening of Maintenance Level 1 roads,

Do not rely on PDFs and BMPs as a way to skew direct, indirect and cumulative effects.

CONCLUSION

Logging on over 60 square miles in these highly biodiverse mature forests between the Wild and Scenic Trinity and South Fork Trinity Rivers in the Corral LSR, Critical Habitat, Evolutionary Significant Units for wild salmon and steelhead and Key watersheds is not an emergency. Having an entire landscape “shovel ready” to sit on the shelves or cherry pick the greatest timber volume areas for timber sales is not an emergency. If the Forest Service were serious about treating fire risk it would minimize the project to be more consistent with Trinity County Collaborative recommendations and concentrate on ingress/egress routes, roaded ridgetops and private inholdings.

The multiple extraordinary circumstances and the significant impacts from logging 60 square miles would have deleterious cumulative effects. These highly sensitive forests and river systems harbor so many Threatened and Endangered, Candidate, Sensitive and rare and endemic species that deserve the full attention of an EIS and should absolutely not be authorized as an emergency or qualify for emergency consultation. The scoping notice lacks sufficient detail for the public to meaningfully participate in the decision-making process. At a minimum, the agency should provide opportunities for full public engagement, including the ability to comment on the Draft EA, in order to meet NEPA public participation requirements. Given the exceptional ecological and cultural importance of these watersheds, the Forest Service has a responsibility to ensure they are managed thoughtfully and responsibly so that these vital forest and river ecosystems endure for the wildlife and the people that depend on them and for the generations to follow.

Sincerely,

Kimberly Baker
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