



We Advocate Thorough Environmental Review

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Comment on the South Fork Sacramento Public Safety and Forest Restoration Project

Thank you for this opportunity to comment on the Forest Service’s South Fork Sacramento Public Safety and Forest Restoration Project. Our National Forests are a treasure to be cared for and shared with all citizens and visitors to this region. They are also key to addressing the global climate crisis.

The scoping letter (and its attachment) states the purpose of the project as follows:

“The purpose of the South Fork project is to ensure public safety and improve fire resilience of forested ecosystems on National Forest Service Lands as soon as possible to mitigate the potential of a large wildfire, and to improve recreational opportunities. Vegetation and fuels management treatments would be designed to provide for public safety, reduce hazardous fuels in the wildland urban interface (WUI), increase forest health and vegetative diversity, and restore the natural role of fire to the ecosystem.”

We agree these are worthy and urgent goals. However, given the current state of the climate crisis, the urgent need to maximize carbon sequestration, and the potential for our national forests to be part of the climate solution, we find it puzzling that carbon sequestration is not a priority for this project. It is not even mentioned in the scoping letter or its attachment. We ask that the project incorporate carbon sequestration as a major goal and that the Environmental Assessment include this essential component with a high priority. To this effect, retaining the biggest/oldest trees (which contain the most carbon and create sequestered carbon at the greatest rate) and leaving all “removed” vegetation (chipped, masticated, and broadcast) on the forest floor to build organic matter in the soil must be high priorities. Industrial logging of the biggest trees is not consistent with these priorities and must not be part of this project.

Further on the letter states:

“The need for action was determined by comparing existing conditions with the desired future condition from the Shasta-Trinity National Forest Land and Resource Management Plan (Forest Plan, USDA-FS 1995)...”

We note that the entire history of the national forest service has been predicated on the priority to manage forests for timber harvest. A Forest Plan from 1995 is likely to continue this tradition and unlikely to include any concern regarding the climate crisis and the now urgent need to utilize the forests to sequester carbon. We ask that this project NOT rely solely on this outdated Forest Plan, but identify and incorporate the appropriate activities required to ensure maximum sequestration of carbon while minimizing carbon emissions while carrying out the work plan.

It is appreciated that the scoping letter and its attachments were prepared by professional foresters who thoroughly understand the particulars but it leaves many points in need of greater clarification in the Environmental Assessment for the understanding of interested members of the public. What must be only a partial list of questions follows.

“The NEPA process was designed to ensure transparency and openness...”
NANCY H. SUTLEY, Chair, Council on Environmental Quality
Memorandum for Heads of Federal Departments and Agencies
February 18, 2010

Basal Area

- What is the method used to determine basal area?
- Does basal area measurement include ALL tree widths or just the large ones?
- How are dead standing trees, fallen trees, dead brush and live brush (manzanita, etc.) accounted for in basal area?
- What are the current estimated basal areas in the different designated parts of the project?
- On both the map legend and in Table 1, there are the designations Basal Area (BA) > 10" DBH and Basal Area (BA) < 10" DBH with different types of entries in Table 1. Please explain.
- Does the goal of reducing basal area favor eliminating (presumably a few) large trees, (a larger number of) small trees, or brush?
- Does basal area count the height of a tree? A single large tree with some cross-sectional area A might have the same total cross-sectional area of ten smaller trees, each with a cross-sectional area of A/10. But the large tree would still have more wood volume because it is also taller.
- Large trees, because of their larger volume, sequester more carbon than the equivalent cross-sectional area of smaller trees. Large trees continue to sequester carbon at a high rate even when they are mature, and they may continue to do so for hundreds of years. They are also less prone to death from fire. How is this evident desirability of retaining large trees accounted for in the plans?
- If large trees are indeed preserved in the fuel reduction project, will they continue to be protected against future rounds of commercial logging (despite their increasing commercial value)?

Grid Spacing

- In the column under Basal Area < 10" DBH in Table 1, there are entries of "35' spacing" and also notations of "35' x 35'" on the map legend. Please explain.
- If two large healthy trees are within 35' of each other, does that mean that at least one will be cut down?
- A natural forest has spacings that are somewhat random, not a regular spacing. The average spacing is also variable depending on sunlight exposure, slope, proximity to water, etc. Does this random spacing have a biologically important function, and if so, should that not be preserved?
- How much canopy cover will remain?

Forestry Practices

- The letter mentions “Fuelbreaks”. Please describe them and specify where they will be cut.
- If fuelbreaks are cut on ridgelines, will the roads leading to them be decommissioned?
- Are dead and dying trees targeted for removal?
- Is there a desirability distinction made (during tree removal) between different tree types, e.g., knobcone pine vs Douglas fir.?
- How can material be removed from the forest without heavy machinery that tramples desirable young trees and compacts the soil?
- The document refers to best management practices (BMP)—what are they? Who decides what the BMPs are?
- Will chemicals be used to control regrowth of the understory?
- Please describe and specify where log landings and any temporary roads will exist.
- Please describe the planned treatment of slash from logging.
- How would this project describe the type of thinning being considered?
- Is biomass being considered as part of this project?
- Are any more plantations being considered?
- What might be the impacts to groundwater levels and stream flow, short term and long term?

Biodiversity

- With the exception of the Northern Spotted Owl, there is no discussion of identifying plants listed by the California Native Plant Society under the California Native Plant Protection Act along with other CESA species that may reside in the project region and ensuring their protection. This must be included.
- Were it not so designated, how much of the Fire Management Zones would otherwise consist of Northern Spotted Owl territory?
- Will the prescribed burns be timed to protect the Northern Spotted Owls from smoke hazard?

Map

- Are all of the areas on the map within the project boundary that are not colored going to have prescribed burning as is suggested by the map legend?
- There are several areas on the map that are bordered radially, like the large pink area. Why are they bounded by a geometric shape rather than following land contours?
- Will any of the new trails shown on the map be wheel chair/ADA/handicapped accessible like the trail to Vista Point at Castle Crags State Park?

Campgrounds

- Can you give more details on the proposed campgrounds?
- Are you trying to prevent people from being hidden when camping outside of established campgrounds?
- What is meant by “hardening” campgrounds?
- How do you plan to “Eliminate dispersed camping along the South Fork Sacramento River from the national forest boundary to first bridge, along the South Fork Road”?
- Please describe the proposed development of the Buddha Hole campground.
- Will more campgrounds encourage even more visitors exacerbating dispersed camping problems?
- Will some roads be decommissioned to prevent dispersal?

Carbon Budget

- What is the carbon budget for this project (CO₂ emissions from activities, prescribed burns, loss of soil carbon and loss of carbon sequestered in the trees being removed, et cetera)?
- How long until the remaining trees sequester this amount of carbon again (Net Zero)?

Port Orford Cedar

- How is Port Orford Cedar root disease spread?
- What methods will be used to prevent this root disease from spreading?

What is the time frame for this project?

When will prescribed burns occur?

What are the alternatives? The most fire-resilient/fire adapted forest is a mature forest — one with big old mature trees. Keeping forests in a state of constant cultivation for harvest is not consistent with fire resiliency. This project should permanently dedicate this region to fostering a mature forest.

Although I've visited the Bennett Juniper up by the Sonora Pass and visited the Tall Trees Grove in Redwood National Park, I've come to realize these special trees are exceedingly rare. People of my generation enjoying walks in the forest probably never imagine or conceive of walking those same paths in cathedral-like forests like those which existed in centuries past. It will take centuries beyond my passing before forests like those even begin to return. We can only have hope for the future that the restoration is beginning.

Thank you for considering our questions and attempting to enlighten us all about this project.



Frank Toriello
President
We Advocate Thorough Environmental Review (W.A.T.E.R.)