

September 13, 2002

Ray Haupt  
Scott River Ranger District  
11263 North Highway 3  
Fort Jones, CA 96032

Annie Buma  
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**Re: Whittler Project Scoping Comments**

Dear Mr. Haupt,

The Environmental Protection Information Center (EPIC) has reviewed the August 21, 2002 scoping notice for the proposed Whittler Project on the Scott River Ranger District. According to the scoping notice, the Whittler Project would log approximately 760 acres within 12 units in the South Fork Scott River watershed, about three miles south, and seven miles southwest of the community of Callahan. Logging systems would consist of 561 acres of helicopter, 56 acres of helicopter with tractor bunching, and 143 acres of tractor logging. 36 acres would be logged with a commercial thinning prescription, 47 acres would be logged with the sanitation prescription, 662 acres would be logged with the single tree selection prescription, and 15 acres would be logged with the shelterwood prescription. Fuels prescriptions incorporate 485 acres of handpiling, 54 acres of lop and scatter, 48 acres of tractor piling, and 173 acres of underburning. In addition, one new helicopter landing with approximately 500 feet of system road construction to access the landing would be constructed, and conifer seedlings would be planted and gopher baiting would be conducted on the 15 acres to be logged under the shelterwood prescription. Finally, the proposed project would place crushed aggregate surfacing on approximately 1.19 miles of roads within the project area.

1. General Comments

We are strongly opposed to the proposed timber sale. The proposed logging targets some of the last late-successional and old-growth forest habitat remaining in the Scott River basin, and is located adjacent to the Pacific Crest National Scenic Trail in high elevation roadless areas between the Russian and Trinity Alps Wilderness Areas. Past impacts in the watershed and surrounding area from logging, road construction, grazing, fire suppression, and other activities have severely degraded aquatic and terrestrial systems and the species dependent upon them. The cumulative impacts from past, present, and foreseeable future activities in the area are highly significant. We believe that the proposed logging will degrade forest health, adversely impact plant and wildlife habitat, including threatened and sensitive species, degrade water quality and impact aquatic species, including listed fish species, increase the forest's susceptibility to insects,

disease, and fire, and reduce long-term site productivity. We are also strongly opposed to any new road construction, even temporary, as this will certainly impact water quality and aquatic conditions, soils and site-productivity, wildlife habitat, and other ecosystem components.

We urge you to abandon the proposed timber sale, and develop a project aimed at restoring impacts from past management activities on the Forest. This would include non-commercial thinning and fuels reduction of small-diameter understory material (e.g., brush, shrubs, small (<4") trees) within previously logged areas, especially plantations. It would also include prescribed burning to reestablish historic fire regimes, and decommissioning of the extensive road network in the area to reduce watershed impacts. We believe that these actions, not the ones proposed in the scoping notice, will achieve the projects' objectives of reducing potential fire severity and improving forest and watershed conditions. At the very least, an alternative should be considered and analyzed in the EA that includes these actions.

Please consider the following specific comments during preparation of the EA for the timber sale.

## 2. Soils and Long-Term Productivity

We are concerned about potential impacts to soil integrity and productivity from the proposed actions. What is the anticipated level of ground disturbance and compaction from the proposed action (by harvest system), particularly in tractor logging units? What historical activities have occurred within the project area, and how will the proposed actions impact soil integrity and long-term site productivity? What geologic formation and soils are in the proposed units, and how do these soils respond to logging and road construction activities? The EA must analyze all potential direct, indirect, and cumulative impacts on soil productivity, including soil cover, porosity, organic matter content, and surface organic matter, moisture regime, hydrologic function, and buffering or exchange capacity. The EA must address all potential soil impacts from the project, including compaction, displacement, erosion, and mass wasting. It must address soils impacts from any past activities within the proposed units, including past logging, fire suppression activities, roads (including temporary), skid trails, grazing, and Off-Highway Vehicles. It must also address soils impacts from all proposed future activities, including felling and yarding of trees, skid trails, landings and temp road construction, fuels treatments and site preparation. It must also address the potential impacts to soils from gopher baiting. The EA must adequately demonstrate that the project will comply with all Forest soil quality standards and guidelines and Regional Soil Quality Standards, and ensure that long-term productivity be maintained as required by the National Forest Management Act. We expect that all required soils assessments and evaluations outlined in the Klamath NF Land and Resource Management Plan (LRMP), Forest Service Handbook (FSH) and Forest Service Manual (FSM) will be completed and that the project file will include full documentation of the soils and geology analysis for public review. To adequately assess potential impacts to soils and long-term productivity, a qualified journey-level soil scientist should be included in the Interdisciplinary Team for this project.

### 3. Plant, Fish, and Wildlife Species Impacts

We are very concerned about potential impacts to plant, fish, and wildlife species from the proposed actions. We are particularly concerned that the project will adversely affect habitat conditions, prey species, and viability of Proposed, Threatened, Sensitive, and Management Indicator Species (PETS and MIS) found within the project area, including but not limited to northern spotted owl, Pacific fisher, marten, northern goshawk, and bald eagle. The BA/BE's for plants, fish, and wildlife and the EA must address all potential direct, indirect, and cumulative impacts to these species from the project at appropriate spatial and temporal scales. The EA should describe the existing vegetation conditions in the project area, including a description of species, stand structure, seral stage, and size classes of trees. The EA should also describe what species are known or suspected to occur within or use the project area. The EA should describe impacts from the proposed logging and road construction on plant and wildlife habitat, in terms of amount, distribution, fragmentation, and connectivity for all species of concern.

We are concerned that the Forest has not used adequate information and current management direction to ensure that the project will not jeopardize the viability of PETS and MIS species found in the project area. For many of these species, the Forest Service has no up-to-date population data describing population numbers, locations, and trends, nor monitoring data on which the agency can rely to determine that the proposed actions will maintain numbers and distribution of these species sufficient for ensuring long term viability. To adequately address this, the EA must analyze species populations as well as habitat. The EA must also ensure that the habitat conditions for each MIS and PETS species is maintained, including canopy cover, stand structure, snags, and down logs.

The proposed activities will likely adversely impact threatened and sensitive fish and wildlife species in the area. We do not believe that this is consistent with the Aquatic Conservation Strategy, Endangered Species Act, National Forest Management Act, or Clean Water Act. The EA must explicitly address this issue.

### 4. Water Quality, Riparian & Aquatic Habitat, and Fisheries

We are concerned that the proposed actions will adversely affect water quality, riparian and aquatic habitat, and fisheries within and downstream from the project area, in violation of the Aquatic Conservation Strategy (ACS) and Clean Water Act. The Record of Decision (ROD) for the Northwest Forest Plan requires that all actions either maintain good aquatic habitat conditions, or restore them if they are degraded (ROD, pp. B-9 & B-10). We do not believe that the proposed actions meet this requirement, and will in fact degrade existing conditions and contribute to significant cumulative watershed effects in Scott River watershed and Klamath River Basin. The EA must address all potential impacts to riparian reserves, aquatic conditions, resident fish habitat, and downstream water quality.

The EA must demonstrate compliance with all Aquatic Conservation Strategy (ACS) objectives. Specifically, the EA must demonstrate that the project will maintain and restore plant communities in riparian areas and wetlands, provide adequate summer and winter thermal regulation, nutrient filtering, appropriate rates of surface erosion, bank erosion, flow regimes,

water quality, channel migration, and coarse woody debris sufficient to sustain physical complexity and stability of the aquatic system. The EA must address issues and potential impacts related to turbidity, sediment, nutrient, temperature, dissolved oxygen, and other water quality parameters.

The EA must disclose how this project will contribute to existing cumulative watershed effects (CWE's), and demonstrate that the project will comply with all applicable provisions of the Clean Water Act and North Coast Basin Water Quality Control Plan (Basin Plan), including non-degradation requirements. To comply with NEPA, CWA, and the ACS, the EA must explicitly address CWE's at the appropriate spatial and temporal scales for the specific impacts of concern (e.g. increased sedimentation, altered temperature patterns, deficits of large woody debris, altered hydrologic regime, resident fish habitat conditions, downstream anadromous habitat conditions, and domestic water quality). This means that the CWE analysis for the sale cannot be limited only to the subwatersheds that are within the project area, and must address how this proposed project contributes to watershed-level and basin-level impacts. The EA must provide data or evidence to support any CWE analysis that is conducted, and should provide empirical data that is used to calibrate the ERA/TOC model, if that is used for the sale. The EA should also describe how validation and monitoring of the ERA method will be conducted for this particular proposed action. The EA must address all past, present, and foreseeable future cumulative effects in the project area, including logging, grazing, OHV use, and other activities on private lands. EPIC expects that a detailed CWE analysis related to these issues will be completed prior to the completion of the NEPA process, and the results incorporated in the EA for public disclosure and review.

We are concerned about the potential logging within Riparian Reserves. If this is proposed, then the EA needs to provide an analysis to justify the need for these actions and describe how they will achieve ACS objectives. For example, the EA must disclose in detail what stand conditions are like within any Riparian Reserves proposed for logging, and how proposed operations will contribute to achieving the objectives of the ACS within them. The EA must demonstrate that the proposed actions will maintain or improve riparian and aquatic habitat conditions to comply with the ACS. The EA needs to discuss how all wetlands, seeps, springs, creeks, and unstable areas will be identified and protected in the proposed project. Absolutely no temp roads or skid trails should be constructed through any RR, no heavy equipment should be allowed, and only hand thinning of small-diameter material should be considered.

We are concerned about impacts resulting from logging and road construction operations on steep slopes, erosion-prone soils, and unstable areas (particularly tractor yarding and mechanical site preparation). The EA should fully address this issue, describe how soils and watershed impacts will be avoided, and prohibit operations in all sensitive and unstable areas.

We are also concerned about wet weather operations for road work and/or logging activities and their impact on the aquatic and riparian system. We strongly oppose such wet weather operations. The EA must disclose the timing of operations, and if wet weather operations will be proposed for any part of this project, it must analyze the potential significant adverse effects it will have on soils and the aquatic system.

The high road density in the vicinity is severely impacting the terrestrial and aquatic systems in the area, and needs to be reduced. No new roads, even temporary, should be built, and a comprehensive program to aggressively identify and decommission environmentally harmful roads needs to be implemented in order to comply with the objectives of the ACS. The influence of existing roads within the project area and within the project area watersheds on meeting the ACS objectives needs to be assessed. This information is necessary in order for an adequate evaluation of the proposed action. The EA should also consider an alternative that does not include any temporary road construction. The EA should also include a description of the Forest- and watershed-level Roads Analysis results and how this project achieves the goals and objectives for roads management in the area, pursuant to Forest Service Roads Policy.

We are also concerned about proposed landings for logging. The EA should fully analyze the impacts from landing construction and use on plants, vegetation, soils, water quality, aquatic and riparian conditions, and wildlife.

## 5. Fuels and Fire

We are concerned that the proposed actions will not improve the fire resistance or resilience of the project area, and will in fact increase the threat of catastrophic fire. We are concerned about stand structure and microclimate, and are very concerned that the project will remove large-diameter logs, snags, and green trees that are important for ecosystem processes, soils, wildlife, and watershed function. We are concerned that the proposed activities will open up the canopy which will make the understory more open and exposed, with increased sunlight, temperatures, and wind, decreased air humidities and fuel moisture levels, decreased conifer regeneration, and increased shrub and herb growth, leading to increased fire risk in the stands. We are also concerned about long-term fuels conditions within the project area in terms of fire and fuels. We are concerned that adequate funds are not available for adequate activity fuels treatment, and request that the EA include a full assessment of this issue. We are concerned that the proposed project will remove large-diameter woody material at the expense of ecosystem health, while leaving the highly-flammable small-diameter materials on site. We request that the EA address these critical issues. The EA should provide site-specific information on current fuels conditions within the project area, disclose the size of woody material to be removed in the timber sale, and the resulting fuels conditions after both logging and fuels treatments, in terms of size classes, continuity and distribution, etc.. The EA should provide empirical evidence that the proposed activities will not in fact increase the risk of both ignition and severe fire behavior, and address the effects of the proposed activities on fire behavior, spread, and severity. The EA should also demonstrate that the project will comply with all provisions of the Federal Wildland Fire Policy, National Fire Plan, and Forest Service Cohesive Strategy.

## 6. Forest Health

We are concerned that the proposed logging and road construction will degrade forest health, not improve or maintain it, as stated in the scoping notice. The scoping notice implies that removing dead, dying, or diseased trees will improve forest health. However, these trees, including old, decadent trees and those infected with dwarf mistletoe, are critical and normal components of a healthy forest ecosystem, and provide a variety of ecosystem services such as wildlife habitat.

The EA must provide sufficient documentation to demonstrate that forest health is actually degraded by the presence of these trees, and provide scientific evidence that demonstrates that the proposed actions will improve forest health rather than degrade it.

#### 7. Socio-Economics

We are concerned about the potential socio-economic impacts from this sale and the Forest Service timber sale program. The EA must analyze all costs associated with the planning, preparation, administration, and implementation of this sale, including all post-sale fuels work, road work, and site rehabilitation. The EA should describe how much of these costs will be paid for by the timber sale purchaser, and how much will be paid for by taxpayers. The EA must also assess the value of ecosystem services provided by not logging this area, including soil and water conservation, flood control, pest control, and carbon sequestration. The EA must demonstrate that the project will maximize social and economic benefits to the American people. The EA should also describe the total volume of timber to be removed in the proposed sale, and describe the size class distribution and species of trees to be logged.

#### 8. Snags, Large Woody Debris, and Late-Successional Habitat Conditions

We are concerned about the reduction of snag and coarse woody debris (LWD) resulting from the proposed project, and impacts to late-successional habitat conditions. What are the current and anticipated post-logging levels of snags and coarse woody debris in the project area? How do you intend to achieve desired levels of these forest structural elements throughout time? What are the cumulative effects on snags, large-woody debris, and late-successional habitat conditions from the project, combined with past, present, and reasonably foreseeable future actions? How much late-successional forest remains in the affected fifth-field watershed, and how much will be removed in the proposed logging? We request that the EA address this issue in detail.

#### 9. Range of Alternatives

We request that the EA develop and analyze a "restoration-only" alternative that does not involve a commercial timber sale, that treats only small fuels, including small trees and brush, retains all live green trees, snags and down logs larger than 16" diameter, includes hand piling and prescribed burning, and does not involve any road construction.

#### 10. Scenic and Recreation Impacts

The proposed logging is proposed adjacent to roads that access Wilderness trailheads, and many of the proposed units in Jackson Creek watershed are located adjacent to the Pacific Crest National Recreation Trail. The EA should describe the potential impacts to scenery and recreational use of these trailheads and trails, including visual impacts, noise impacts, traffic impacts, and other impacts that may affect recreation and scenic values in the project area.

## 11. Roadless Area Impacts

The proposed logging units are located in currently unroaded areas adjacent to the Russian and Trinity Alps Wilderness Areas, and are de facto roadless. The EA needs to therefore analyze the potential significant impacts to these roadless areas.

## 12. Survey and Manage Species

We are concerned that surveys are adequately conducted for all Survey and Manage species known or suspected to occur within the project area, and that all suitable habitat for these species is adequately protected. The EA should describe which species are known or suspected to occur in the project area, what surveys have been conducted, and what mitigation measures will be implemented for their conservation.

## 13. Mitigation Measures and BMPs

We are concerned about the adequacy of mitigation measures and traditional Best Management Practices (BMP's) in protecting soils and watershed values. The EA must specifically evaluate the effectiveness of BMP's and mitigation measures in actually achieving their purpose. It is not sufficient to simply list the BMP's or project design features that will be applied and assume they will be effective. The EA needs to conduct a site-specific evaluation of these measures to demonstrate that they will achieve their stated objectives.

## 14. Neotropical Migratory Birds

We are concerned about potential impacts to neotropical migratory birds from the proposed actions. We expect that the EA will assess and discuss these impacts.

## 15. Information Request

We request a copy of the following documents as soon as possible:

- a. Westside Roads Analysis
- b. Callahan Ecosystem Analysis
- c. Watershed-level Roads Analysis Report
- d. Biological Evaluations/Assessments for PETS plants, fish, and wildlife
- e. Soils and Geology Reports
- f. Cumulative Watershed Effects Analyses
- g. Fire and Fuels Reports
- h. Any other reports that address aquatic, riparian, hydrology, fisheries, or watershed impacts
- i. Any other reports that address plants or wildlife, including Survey and Manage species and neotropical migratory birds
- j. Any reports that address roadless areas
- k. Any reports that address scenery and/or recreation
- l. Any reports that address insects, disease, and forest health

## 16. Conclusions

In summary, we are very concerned about the potential adverse environmental and socio-economic impacts that will result from the proposed actions, and are strongly opposed to the project as outlined in the scoping document. We request that you consider other alternatives in the EA that address the issues we have raised above. We also believe that because of the likely significant impacts that will result from the proposed actions that an Environmental Impact Statement (EIS) should be prepared for the sale. If you choose to prepare an EA rather than an EIS for the sale, then the EA must adequately demonstrate that the proposed actions will not result in significant impacts, as defined in 40 CFR § 1508.27. Thank you for your consideration.

Sincerely,

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/s/Anthony Ambrose