



November 15, 2021

Regional Forest Jennifer Eberlien  
Forest Service Pacific Southwest Region 5  
1323 Club Drive  
Vallejo, CA 94592

**Re: Region 5 Post Disturbance Hazardous Tree Management Scoping Comments**

Dear Regional Forester Eberlien:

These are the joint scoping comments of the California Wilderness Coalition, the Northwest California Mountains and Rivers Campaign, and the Willetts Environmental Center in response to the Region 5 Post Disturbance Hazardous Tree Management project. We collectively endorse and hereby incorporate by reference the comments submitted by other groups, including those submitted by Sierra Forest Legacy et al, Friends of the Plumas Wilderness, and the Environmental Protection Information Center et al.

According to the scoping notice, the project "...includes hazard tree felling and removal, as well as removal of downed woody fuels resulting from hazard trees (slash), to reduce public safety hazards along portions of roads, trails, and near facilities (campgrounds, trailheads, Forest Service offices)."

A review of the project maps shows that the proposal includes extensive hazard tree removal along hundreds of miles of roads on nine National Forests in Region 5. In addition, the project also proposes hazard tree removal in the following sensitive areas:

1. Along the Three Lakes trail in the congressionally designated Bucks Lake Wilderness on the Plumas National Forest.
2. The Chinquapin and Pattison Inventoried Roadless Areas (IRAs) on the Shasta-Trinity National Forest proposed for wilderness designation in legislation that has passed the House of Representatives several times and is currently pending in the U.S. Senate (proposed Chinquapin and Pattison Wilderness on the Shasta-Trinity National Forests).

3. Additions to the Ansel Adams Wilderness on the Sierra National Forest proposed in the 2019 Draft Sierra National Forest Plan under Alternatives C and E.
4. Several Inventoried Roadless Areas (IRAs), including the Wonoga Peak IRA on the Inyo Forest; the San Joaquin and Dinkey Lakes IRAs on the Sierra Forest; the Chips Creek, Middle Fork, and Bald Rock IRAs on the Plumas Forest; the Thomes Creek, Grindstone, and Snow Mountain IRAs on the Mendocino Forest; and the Chinquapin, Pattison, and South Fork IRAs on the Shasta-Trinity National Forests.
5. The Middle Fork Feather Wild and Scenic River on the Plumas Forest, along with several streams and rivers determined eligible for National Wild and Scenic River protection in the forest planning process, including Lone Pine Creek on the Inyo Forest (2019 Final Plan); the MF Tule River, NFMF Tule River, Belknap Creek, Freeman Creek, Dry Meadow Creek, Nobe Young Creek, Alder Creek, Bull Run, Deep Creek, Boulder Creek, Brush Creek, Trout Creek, Fish Creek, Salmon Creek, and Lucas Creek on the Sequoia Forest (2019 Draft Plan); the SF San Joaquin River and Granite Creek on the Sierra Forest (2016 and 2019 Draft Plans); the Fall River, Onion Valley Creek, Bear Creek, Little North Fork, Chips Creek, Yellow Creek on the Plumas Forest (1988 Final Plan); and the upper SF Trinity River and Hayfork Creek (determined eligible and recommended by the Forest Service in the 1995 STNF Plan).
6. Four National Recreation Trails (NRTs), including the Lone Pine NRT on the Inyo Forest; the Hartman Bar and Feather Falls NRTs on the Plumas Forest, and the SF Trinity NRT on the Shasta-Trinity Forest.
7. Many wilderness access trails between their trailheads and wilderness boundaries, including trails leading into the Ansel Adams Wilderness on the Sierra Forest, Yolly Bolly-Middle Eel Wilderness on the Mendocino and Shasta-Trinity Forests, Trinity Alps and Mt. Shasta Wilderness on the Shasta-Trinity Forests, and Marble Mountain Wilderness on the Klamath Forest.

Before any further work is accomplished on this project, we strongly request that the project maps be revised and shared with the public to show all potential conflicts with areas actively proposed as wilderness, IRA boundaries, designated and eligible and/or recommended Wild and Scenic Rivers, and National Recreation Trails.

Hazard tree removal in these sensitive areas should not be part of this emergency effort. We do not believe that Emergency Situation Determination is appropriate for any of the proposed hazard tree removal in wilderness, IRAs, eligible WSRs, NRTs, popular wilderness access trails, and other sensitive areas. Any hazard tree removal in these sensitive areas must be accomplished in a manner that protects wilderness qualities, IRA integrity, wild and scenic river values, and general scenic and recreation values associated with outdoor recreation on public trails. This requires more extensive environmental review than allowed under the proposed ESD or an otherwise expedited project.

Attached to this letter is a list of sensitive areas that may be adversely impacted by the proposed project. This should not be considered an exhaustive or complete list – that awaits release by the Forest Service or revised project maps that show these sensitive areas.

Please keep us informed about the progress of this project.

Thank you,

Sincerely,



Steven L. Evans  
CalWild Rivers Director

*Signing for the Northwest California Mountains and Rivers Campaign and the Willetts Environmental Center.*

**List of Sensitive Areas That Should be Excluded From  
The Region 5 Post Disturbance Hazardous Tree Management Project  
Compiled by Steve Evans, CalWild Rivers Director, Nov. 15, 2021**

Inyo National Forest

- Whitney Portal National Recreation Trail (3501) – Wonoga Peak Inventoried Roadless Area (IRA), Lone Pine Creek Eligible Wild and Scenic River (WSR)
- Mt. Whitney Trail (3403) – Wonoga Peak IRA, Lone Pine Creek Eligible WSR

Klamath National Forest

- Marble Mountain-Trinity Alps Wilderness Access Trails (leading up to wilderness boundary):
  - Elk Creek Trail (5202)
  - Bear Creek Trail
  - Granite Creek Trail (5206)
  - Johnson’s Hunting Ground Trail (5213)
  - Pacific Crest Trail
  - Trail 5428 (south of Marble Mtn. Wilderness)
  - French Creek Trail (5447, 5477)
  - Cecil Lake Trail
  - Fish Lake Trail (5522)
  - Trail Gulch Trails (5501, 5502)
  - Middle Boulder Trails (5576, 5581)

Mendocino National Forest

- YBME Wilderness Access Trails (THs up to wilderness boundary):
  - Middle Eel Trails 11W50, 11W54, 10W08, 10W15, 9W80
- Grindstone Creek Trails 9W17, 9W16, 9W15, 8W06 – Grindstone IRA
- Thomes Creek Trails (7W10, 8W04) – Thomes IRA, Thomes Creek Eligible WSR
- Upper NF Stony Creek Trail (7W48) – Snow Mtn IRA, NF Stony Creek Eligible WSR
- Dixie Glade-Summit Springs Trail (8W26) – Snow Mtn IRA, SF Stony Creek Eligible WSR

#### Plumas National Forest

- PCT-Chips Creek Trail – Chips Creek IRA & Eligible WSR
- Ben Lomond Trail – Chips Creek IRA & Eligible WSR
- Chambers Creek Trail – Chips Creek IRA
- Yellow Creek Trail – Chips Creek IRA, Yellow Creek Eligible WSR
- Indian Springs Trail – Chips Creek IRA
- Three Lakes Trail – Bucks Lake Wilderness
- Upper Little North Fork Trails 7E18 – Little North Fork Middle Fork Eligible WSR
- Hartman Bar National Recreation Trail 7E13 – Middle Fork IRA, MF Feather WSR
- Stag Point OHV Trail Stag Point Trail
- PCT-Bear Creek-Butte Bar Trails – Middle Fork IRA, MF Feather WSR, Onion Valley Creek Eligible WSR, Bear Creek Eligible WSR
- Cleghorn Bar OHV Trail – Middle Fork IRA, MF Feather WSR
- Oddie Bar Trail – Middle Fork IRA, MF Feather WSR
- Rocky Point Trail – Middle Fork IRA, MF Feather WSR
- McCarthy Point Trail – Middle Fork IRA, MF Feather WSR
- Minerva Bar Trail – Middle Fork IRA, MF Feather WSR
- Crescent Hill OHV Trail – Middle Fork IRA, MF Feather WSR
- Little Volcano-Limestone Point Trail – Middle Fork IRA, MF Feather WSR
- Rich Bar-Quartz Point Trail – Middle Fork IRA, MF Feather WSR
- Bald Rock Trail – Bald Rock IRA/MF Feather WSR
- Feather Falls National Recreation Trail – Bald Rock IRA, Fall River Eligible WSR

#### Shasta-Trinity National Forests

- Cave Trail – South Fork IRA/Proposed Wilderness, SF Trinity WSR
- South Fork National Recreation Trail 08E18 – Chinquapin IRA/Proposed Wilderness, SF Trinity Recommended WSR, EFSF Trinity Proposed WSR
- Rough Gulch Trail – Chinquapin IRA/Proposed Wilderness
- Smoky Creek Trail – Chinquapin IRA/Proposed Wilderness
- Trails 12W36, 12W49, 11W30 – Chinquapin IRA/Proposed Wilderness, SF Trinity Recommended WSR
- YBME Wilderness Access Trails
  - Boundary Trail (10W39)
  - Stuart Gap Trail (10W36)
  - Rat Trap Gap Trails (10W38, 09W30)

- Miners Creek Trails 08E06, 12W31, 12W23 – Pattison IRA/Proposed Wilderness, Hayfork Creek Recommended/Proposed WSR
- Bear Creek Trail (12W22) – Pattison IRA/Proposed Wilderness, Hayfork Creek Recommended/Proposed WSR
- Mt. Shasta Wilderness Access Trails (TH to boundary) -- Whitney Falls Trails 03W19, 03W23
- Trinity Alps Wilderness Access Trails (TH to boundary)
  - Big French Creek Trail 08E03
  - Coffee Creek Trails 08W07, 08W06, 09W02, 07W08

#### Sequoia National Forest

- Hwy 190 – MF Tule River Eligible WSR, Belknap Creek Eligible WSR
- Roads 208, 20S03, 19S29 – NFMF Tule River Eligible WSR
- President Bush Tree Access Road 20S78 – Freeman Creek Eligible WSR
- Freeman Creek Trailhead Road 21S05 – Freeman Creek Eligible WSR
- Various Roads – Dry Meadow, Nobe Young, Alder Eligible WSRs
- Various Roads – Bull Run, Deep Creek Eligible WSRs
- Roads 13S23, 14S09 – Boulder Creek Eligible WSR
- Road 22S12 – Brush Creek Eligible WSR
- Various Roads Around Horse Mdw Campground – Salmon Creek Eligible WSR
- Various Roads in Trout & Fish Creeks Area – Trout & Fish Cks Eligible WSRs
- Road 28S06 – Lucas Creek Eligible WSR

#### Sierra National Forest

- OHV Trail 27E223 cherry stem in the Ansel Adams Wilderness (AAW) west of Edison Res.
- AAW Access Trails 24E03, 27E44 (near Rattlesnake Ck) – AAW Addition
- Kaiser Wilderness Access/Boundary Trails 24E03 & others
- AAW Access Trails 29E11, 28E20, 27E03, 27E46, 27E21 (near Edison Res.)
- Mono Hot Springs Road – SF San Joaquin River Eligible WSR
- Trails 25E24, 24E01 –AAW addition, Granite Creek Possible Eligible WSR
- Trails 24E20, 24E41, 24E03 – AAW Wilderness addition, Granite Ck Possible Eligible WSR
- Jackass Lake Trail 24E05 – AAW Wilderness addition
- Trails 25E24, 24E01, 25E206, 25E207, 24E41, 24E20 – Leading into AAW, potential AAW addition
- French Trail 26E16 –San Joaquin River AAW addition near Mammoth Pool Reservoir