

**Trestle Forest Health Project  
Summary of Scoping Comments  
January, 2014**

**Updated to provide clarification regarding significant and non-significant issues  
July, 2017**

Public scoping was initiated on March 4, 2013 with a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for the Trestle Forest Health Project was published in the Federal Register on March 4, 2013 (78 FR 14072). The notice asked that input on the proposed action be received by April 8, 2013. A project specific scoping notice was sent to 45 individuals, organizations, and government agencies, including federally recognized tribal governments soliciting their input on the proposed action.

The Forest Service received six written letters on the proposed action within the designated scoping period.

- Dick Artley, Individual
- El Dorado Chapter of Trout Unlimited
- El Dorado County Board of Supervisor, District 2
- Environmental Protection Agency (EPA)
- Grizzly Flats Fire Safe Council
- John Muir Project

Three letters were received after the designated scoping period.

- John Muir Project and Center for Biological Diversity
- RD Harrington, Individual
- Grizzly Flats Community Services District

The summary of scoping comments and how they were considered is provided in Table 1. Specific scoping comments can be found in the project file. Issues (cause-effect relationships) serve to highlight effects or unintended consequences that may occur from the proposed action, providing opportunities during the analysis to explore alternative ways to meet the purpose and need for the proposal while reducing adverse effects.

**Significant issues** represent unresolved conflicts with or undesired effects caused by the proposed action and are defined as those directly or indirectly caused by implementing the proposed action. Issues were categorized as significant if:

- The impact has the potential to be severe and highly noticeable.
- The magnitude, extent, direction, duration, or speed of the effects are uncertain at this time. Further analysis or data collection

is needed to determine whether the impacts have the potential to be severe or highly noticeable.

- The impact is considered controversial, with comparatively high levels of interest and conflicting concerns. The issue is perceived by the public as causing severe and highly noticeable effects.

**Minor or Non-Significant Issues** involve measurable or noticeable effects at a level too low (with or without mitigation) to drive the development of additional alternatives. These issues may have been considered in clarifying the proposed action, developing design criteria, or addressed through the effects analysis, but did not warrant development of alternatives to the proposed action. Non-significant issues are also identified as those: a) outside the scope of the proposed action; b) already decided by law, regulation, Forest Plan, or other higher-level decision; c) irrelevant to the decision to be made; or d) conjectural or not supported by scientific or factual evidence.

**Non-Issue** comments do not raise specific concerns with the proposed action. Non-issue comments may be statements of opinion or position, requests to clarify the proposed action, provide recommendations for the analysis, or comments that do not identify any adverse effect that could result from the proposed action.

**Table 1.** Summary of Scoping Comments

Issue or Concern	Commenter	How the issue or concern was considered
<p><b>General Opposition</b> Expressed opposition to roads and logging.</p>	<p>Dick Artley, email dated March 17, 2013</p>	<p><b>Non-Issue</b> Comments were general in nature and did not provide project specific issues relative to the effects of the proposed action.</p>
<p><b>General Support and Firewood</b> Expressed general support for the fuels reduction treatments. Expressed concern about the waste of biomass materials (slash material and tops of trees) and wants citizens to be able to cut firewood instead. Consider leaving scattered slash and tops for the public to access as firewood.</p>	<p>El Dorado County Board of Supervisor, District 2, Ray Nutting, letter dated April 8, 2013</p>	<p><b>Non-Significant Issue</b> Biomass (non-commercial) material accumulated on landings would be disposed of or removed in a number of ways, including personal use firewood. In addition, design criteria was incorporated into the proposed action and alternatives: “Near residences, stack in decks some material that would otherwise be put into landing piles to facilitate access for firewood collecting when feasible.”</p>

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<p><b>General Support and Firewood</b> Expressed general support for the fuels reduction treatments. Allow members of the community to salvage as much “unsalable wood” as possible.</p>	<p>Grizzly Flats Fire Safe Council, letter dated April 6, 2013</p>	<p><b>Non-Significant Issue</b> Biomass (non-commercial) material accumulated on landings would be disposed of or removed in a number of ways, including personal use firewood. In addition, design criteria was incorporated into the proposed action and alternatives: “Near residences, stack in decks some material that would otherwise be put into landing piles to facilitate access for firewood collecting when feasible.”</p>
<p><b>Protection of Water Improvements</b> Wants to ensure water diversions and water supply (pipelines) are protected while the work is completed. Request notification of any possible contamination so water quality could be monitored and treatment process altered if necessary.</p>	<p>Grizzly Flats Community Services District, letter dated April 29, 2013</p>	<p><b>Non-Significant Issue</b> Design criteria was incorporated into the proposed action and alternatives to “Protect infrastructure for Grizzly Flat, including Grizzly Flat Community Services District diversion dams, drafting stations, and pipelines, as well as electric lines, phone lines, and water pipes for private inholdings, during treatment activities.”</p>
<p><b>Black-Backed Woodpecker</b> Expressed concerns about the impacts to the black-backed woodpecker due to mechanical thinning and if planned prescribed fire is not sufficiently intense/severe to result in substantial basal area mortality. Attached the federal ESA listing petition.</p>	<p>Chad Hanson, Ph.D., Ecologist and Director, John Muir Project, email dated April 8, 2013</p>	<p><b>Non-Significant Issue</b> An effects analysis for the black backed woodpecker was included in the EIS.</p>
<p><b>General Support</b> Expressed general support for the project.</p>	<p>RD Harrington, letter dated April 17, 2013</p>	<p><b>Non-Issue</b></p>

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<p><b>Roads and Sedimentation</b> Expressed general support for the project, but have concerns about the extensive road presence and actions that will add sedimentation in the streams and work in the riparian conservation areas. Excess of roads in the project area present the risks for sedimentation delivery to the streams and maintenance challenge to eliminate this sedimentation. Definition of restoration and maintenance is absent.</p>	<p>Stanley Backlund, El Dorado Chapter of Trout Unlimited, letter dated April 8, 2013</p>	<p><b>Non-Significant Issue</b> Road reconstruction and obliteration activities are included in the proposed action and alternatives and are described under the Transportation System section. In addition, restoration activities associated with dispersed recreation, roads, and trails was incorporated into all of the action alternatives to reduce sedimentation and improve watershed conditions.</p>
<p><b>Riparian Conservation Areas</b> Criteria for riparian conservation areas was not addressed. Expect that sufficient clearance area will be maintained near the streams to prevent harmful results. Large woody debris within the streams is desirable and the presence of such debris or the introduction of such debris should be beneficial to stream habitat for fish and other aquatics.</p>	<p>Stanley Backlund, El Dorado Chapter of Trout Unlimited, letter dated April 8, 2013</p>	<p><b>Non-Significant Issue</b> Design criteria for Hydrology and Aquatic Features have been incorporated into the project.</p>
<p><b>Air Quality</b> The FS should determine which aspects of the project comply with EPA's Interim Air Quality Policy on Wildland and Prescribed Fires and include these findings as part of the applicable EPA approved Smoke Management Program.</p>	<p>Environmental Protection Agency, letter dated March 27, 2013</p>	<p><b>Non-Issue</b> Air quality is addressed in the EIS under Chapter 3.</p>

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<p><b>General Recommendation for Analysis to Include in DEIS</b> EPA encourages the FS to include in the DEIS the results of a comprehensive biological survey of the project area. The DEIS should also including evaluations of air quality, water quality, climate change, noxious weeds, as well impacts involving roads and landings.</p>	<p>Environmental Protection Agency, letter dated March 27, 2013</p>	<p><b>Non-Issue</b> The EIS includes the affected environment and environmental consequences for Forest Vegetation, Fire/Fuels, Botany (including invasive species), Water Quality/Hydrology, Aquatic Wildlife, Terrestrial Wildlife, Cultural Resources, and Climate Change.</p>
<p><b>Noxious Weeds</b> The DEIS should include a comprehensive survey of noxious weed species and include mitigation measures.</p>	<p>Environmental Protection Agency, letter dated March 27, 2013</p>	<p><b>Non-Issue</b> The DEIS includes discussion of Invasive Plant Species, including the current status within the Trestle project area and environmental consequences. Design criteria for Botany, including invasive plant species were incorporated into the project.</p>
<p><b>Road Reconstruction and Closures</b> Suggest the DEIS include a list and maps of the roads, and trails that will be impacted by the project. Provide details on which roads and landings would be re contoured and commit to scarifying the surface of roads, and trails selected for decommissioning, seeding/replanting such areas, and blocking vehicle traffic with rocks or barricades.</p>	<p>Environmental Protection Agency, letter dated March 27, 2013</p>	<p><b>Non-Issue</b> The proposed action and alternatives include a description of activities associated with the Transportation System such as road reconstruction and road obliteration activities. In addition, restoration activities associated with dispersed recreation, roads and trails are included in the alternatives.</p>
<p><b>Best Management Practices</b> Include Best Management Practices that will help to reduce water quality impairment.</p>	<p>Environmental Protection Agency, letter dated March 27, 2013</p>	<p><b>Non-Issue</b> Design criteria for hydrology and aquatics features have been incorporated into the project. The Best Management Practices relevant to this project can be found in the DEIS appendices.</p>

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<p><b>2004 SNFPA</b>  The 2004 Framework has been rendered inadequate and obsolete by significant new information and a Supplemental EIS must be prepared before further logging projects may proceed.</p>	<p>The John Muir Project and Center for Biological Diversity, letter dated May 17, 2013</p>	<p><b>Non-Significant Issue</b>  The referenced 2004 “Framework” is not an ongoing, agency action, as described in case law. Therefore, NEPA’s supplementation regulations (40 CFR 1502.9(c)) do not apply to the 2004 Framework EIS; nor does NEPA require the agency to prepare a “Sierra Nevada-wide Cumulative Effects EIS.” Even though the Forest Service is not required to prepare a supplemental EIS for the 2004 Framework based on new scientific information, the agency is responsible for considering new information at the project level, when such information is relevant to the project being considered. In this way, new science is addressed at the time and scale that is most relevant and practical.</p>