



November 1, 2022

Reviewing Officer: Jennifer Eberlien, Regional Forester, USDA Forest Service  
1323 Club Drive  
Vallejo, California, 94592

**RE: R5 Central Sierra Post-disturbance Hazardous Tree Management Project #NP-3336**

Friends of Plumas Wilderness provided project-specific written comments on November 15, 2021 and May 8, 2022. We appreciate that the Forest Service removed roads, trails, and areas within designated Wilderness and Inventoried Roadless Areas from consideration in the Central Sierra Zone. Public review of the proposed project has improved the Project yet we have some objections.

**Objections & Remedies:**

**1. The Forest Service did not address all site specific comments submitted.** Friends of Plumas Wilderness provided several tables with site specific comments in our May 8, 2022 comment letter. Most of the locations we provided site specific comments for are not included in Table 1 of Appendix A: Site Specific Suggestions in the R5\_Comment\_Consideration\_092022 document.

In our November 15, 2021 comment letter we wrote “Our hope is the Forest Service acknowledges our concerns, addresses them, and considers our recommendations.” Because most of the site specific suggestions we provided are not included in the Comment Consideration document we doubt that the Forest Service acknowledged, addressed, or considered our recommendations.

**Remedy:** We recommend that Plumas and Lassen National Forest Supervisor's work in coordination with Friends of Plumas Wilderness prior to hazard tree removal on any roads or trails identified in our May 8, 2022 comment letter. On the Plumas National Forest these include: 7E13, 6E11, 6E20, 9E08, 6M46/7E18, 10M10, 10M11, and 21N25A within the Feather Falls

Special Interest Area. On the Lassen National Forest these include: 29N40, 29N02Y, 29N02YA, and 26N74.

**2. Prioritize closing ineligible roads.** The November 15, 2021 Friends of Plumas Wilderness comment letter states: “**Hazardous tree removal along trails and low use Level 2 NFS roads will likely have significant environmental impacts.** The economic and social benefits of hazardous tree removal are obvious but there are several negative environmental effects associated with post fire logging. The removal of hazardous trees within 300 feet of low use Level 2 NFS roads and trails will likely have significant negative impacts on soils, vegetation, fuels, and wildlife because treatments on these capillary routes will increase edge effects and further fragment intact ecosystems. **If the project includes low use Level 2 roads and trails, cumulative environmental impacts must be analyzed.**”

**Remedy:** Roads identified as Maintenance Level 1 or 2 identified as Likely Not Needed for Future Use in the February [2016 Plumas National Forest Travel Analysis Report](#) should be excluded from the Project. As stated clearly in the Environmental Assessment: “*Treatments will not occur in wilderness or roadless areas, recommended wilderness or wilderness study areas, or along maintenance level 1 roads.*” FoPW insists on the need for a geospatial analysis of the roads identified in the project in relation to roads identified in the Plumas National Forest Travel Analysis Report. Subsequently, roads no longer needed for administrative purposes should be closed to enhance wildlife habitat and to prevent degradation of water and soil health. Roads that are no longer needed might be converted into equestrian, mountain bike and/or pedestrian trails.

**3. The Region 5 Central Sierra Zone Post-disturbance Hazardous Tree Management EA and FONSI lists several Pertinent Executive Orders but does not include Executive Order 14072: Protecting Mature and Old-Growth Forests.** The EA lists several Executive Orders on pages 54-56 but does not include the April 22, 2022 EO issued by President Biden. Section 1 of EO 14072 states: “Strengthening America’s forests, which are home to cherished expanses of mature and old-growth forests on Federal lands, is critical to the health, prosperity, and resilience of our communities - particularly in light of the threat of catastrophic wildfires.”

In our May 8, 2022 comment letter Friends of Plumas Wilderness referenced [Biden’s Executive Order on Strengthening the Nation’s Forests, Communities, and Economies](#) and the importance of carbon sequestration of large trees. We recommended that: “The live trees that remain standing should not be felled in the name of hazard tree removal.” Not including Executive Order 14072 as a Pertinent Executive Order elevates our concern that the comments and recommendations we provided were not analyzed or considered.

**Remedy:** We suggest that the Record of Decision reference EO 14072. In addition, we recommend that the Reviewing Officer: Regional Forester, Jennifer Eberlien share information pertinent to EO 14072 with all Forest Supervisors involved with Region 5 Post-disturbance Hazardous Tree Management to emphasize the importance of retaining mature and old growth trees.

**4. Removal of hazard trees along trails in the Plumas National Forest will detract from the natural character of these places and adversely impact the visitors’ experience.** The November 15, 2021 Friends of Plumas Wilderness comment letter states: “We support long-term sustainable funding of trail management in place of employing an emergency mentality to fell all hazard trees along trails. Hazard trees along trail corridors in wild areas pose

little threat to human safety. Their removal will do little to improve visitor safety but will significantly degrade the visitors' experience."

"When the Plumas National Forest approved the use of chainsaws in the Bucks Lake Wilderness during the North Complex, over 250 trees were felled along the Mill Creek Trail to create two helicopter landing zones and build a contingency fire line. The Mill Creek Trail is no longer a wilderness trail and now looks like a logging road. We fear a similar approach will be employed on all trails on the Plumas National Forest with the implementation of the Region 5 Hazardous Tree Management Project."

**Remedy:** We suggest that the Plumas National Forest follow the lead of the Lassen National Forest and not include any trails in the Region 5 Central Sierra Zone Post-disturbance Hazardous Tree Management Project. Rather than apply an emergency mentality to trail maintenance we would prefer to see the Plumas National Forest support long-term, sustainable funding and annual maintenance of trails.

If the Plumas National Forest insists on the removal of hazardous trees along the 51 miles of trails proposed in the EA, we suggest the Plumas National Forest Supervisor work in coordination with the Friends of Plumas Wilderness prior to hazard tree removal on any trails included in the Post-disturbance Hazardous Tree Management Project.

We appreciate that the EA includes language specific to the Pacific Crest Trail Association working in coordination with the Forest Service to remove hazard trees along the PCT. We suggest that the Record of Decision states: "Specific hazard trees along trails within the Project area on the Plumas National Forest would be identified for removal in coordination with Friends of Plumas Wilderness." Furthermore, we strongly recommend that trees to be removed from trails will be marked, stumps are cut as low as possible, and cuts are angled away from trails.

We look forward to sharing our objections to the R5 Central Sierra Post-disturbance Hazardous Tree Management Project with Forest Service staff. If there are any questions related to points raised in this letter please contact me.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth Ramsey". The signature is written in a cursive, flowing style.

Elizabeth Ramsey  
Conservation & Planning Director  
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