



July 19, 2023

RE: Community Protection Central and West Slope Project #62873

ATTN: Ryan Bauer, Project Coordinator
Plumas National Forest
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Friends of Plumas Wilderness (FoPW) strongly supports Plumas National Forest efforts to 1) reduce risk of wildfire impacts to communities and critical infrastructure, 2) reduce the potential for extreme fire behavior in the Wildland Urban Interface, 3) maintain road systems for emergency access and evacuations, and 4) foster an all-lands approach to fire and fuels management.

Past forest management practices have created dense, even-aged forests composed mostly of small and intermediate-sized trees. FoPW strongly supports the thinning of small and intermediate-sized trees and the use of prescribed fire to produce a more diverse mosaic of age classes and ecosystems. While we recognize the urgency, efforts to rapidly reduce fuels and fire hazard on multiple-use lands must be balanced with the protection of natural and cultural values. Applying the same fuel reduction methods across all Treatment Areas is inappropriate. Areas with sensitive natural and cultural resources require lower impact approaches to fuels reduction. Using a variety of treatments and prescriptions will provide more diverse and resilient ecosystems.

Our board and staff concur that the Relevant Issues raised during Scoping: 1) wildfire and forest resilience, 2) special status species, 3) hydrology, 4) air quality and climate change, and 5) designated land allocations are key topics that must be addressed while rapidly reducing forest fuels on roughly 18% of the Plumas National Forest.

Our comments address proposed treatments and designated land allocations. Given that FoPW's mission is to study, explore and maintain the integrity of natural ecosystems where the Sierra and Cascades meet, we focus primarily on the protection of unique cultural and ecological values associated with predominantly natural ecosystems.

Treatments

Herbicide Application

FoPW led the effort to stop the aerial application of herbicides on Region 5 Forest Service lands in the 1980s. We are glad to see that no aerial spraying is proposed in the Central and West Slope Community Protection Project as aerial application indiscriminately impacts non-target species.

We are surprised to see that the Forest Service has deemed native shrub species and tanoak as "invasive plant species." Shrublands are ecologically important for a diverse array of species and many native shrub species are culturally significant to Indigenous communities. The processing of native plant materials for traditional uses requires that they be handled. Some techniques require processing by mouth.

Given that the use of herbicides on forested lands can lead to significant health issues among Indigenous populations who use traditional practices, we strongly recommend that the Plumas National Forest hire Indigenous people to survey all areas where herbicides will be applied to identify and avoid culturally significant plants. We also recommend the Forest Service hire Indigenous people with a knowledge of native plants and traditional uses to delineate areas where herbicides are not to be used so Indigenous people can safely gather plants from these places and without being exposed to herbicides.

Prescribed Fire

FoPW strongly supports the use of prescribed fire if it is used in locations and at times when it can improve forest health and not threaten communities. We recommend using prescribed fire as often as possible as it is typically the lowest cost fuel reduction treatment and produces a more diverse mosaic of age classes and ecosystems than mechanical or manual treatments. Native Californians used fire to tend landscapes for millenia and many Indigenous people possess Traditional Ecological Knowledge related to cultural burning practices. Integrating TEK, especially information related to when and where to use fire, could benefit prescribed burning efforts.

Permanent Fire Line

FoPW supports the establishment and maintenance of permanent fire lines around communities within the Wildland Urban Interface. Trails around towns can serve a dual

purpose when designed as prescribed burn perimeters and for recreational use. Maintaining permanent fire lines reduces the cost of prescribed burns.

Areas with Serpentine Soils

Serpentine soils are low in essential plant nutrients and support less vegetation than surrounding areas. In Plumas County, serpentine soils provide an ideal location for strategically placed fuel breaks as they are located along a 3-mile by 30-mile northwest/southeast belt perpendicular to local prevailing winds. Large portions of the serpentine belt underlying Plumas County burned at high severity in the North Complex (2020) and Dixie (2021) fires. There is a window of opportunity to use prescribed fire in these areas to maintain an extensive strategic fuel break that is upwind of the most populated portion of Plumas County, including communities in American Valley, Meadow Valley, and the Bucks Lake area.

The EA states that 8,657 acres in the Project Area are underlain by serpentine. FoPW supports fuels reduction treatments in these areas if care is taken to protect rare plants and best available science is used to guide restoration efforts. If mechanized equipment is used for fuels reduction, special care should be taken to reduce the spread of exotic plants as they can outcompete native plant species. If fuels reduction efforts are initiated in serpentine areas we strongly recommend collaborating with the California Native Plant Society, Indigenous people, and ecologists knowledgeable of local rare plant populations.

Mature and Old-growth Forests

FoPW reviewers of the Central and West Slope Community Protection Project EA did not find reference to Executive Order 14072: Strengthening the Nation's Forests, Communities and Local Economies. Released on April 22, 2022, E.O. 14072 required the Forest Service and BLM to define and identify mature and old-growth trees within a year. On April 20, 2023 the Forest Service released FS-1215a: [Mature and Old-growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and BLM](#). It is unclear how these findings have been incorporated into the Central and West Slope Community Protection Project. FoPW recommends the Central and West Slope Community Protection Project EA *clearly demonstrate* how findings from FS-1215a were integrated into the Project. For example, Table 12 on page 34 of FS-1215a: Pacific Southwest Region Old-growth Types and Minimum Criteria shows old-growth Interior Ponderosa Pine have a 21" minimum diameter. Given this definition of old-growth, fuels reduction efforts should not remove Interior Ponderosa Pine larger than 21" dbh if they are found within the Project Area.

FoPW has worked for nearly fifty years to protect the few remaining stands of old-growth forests on the Plumas National Forest from being logged. Given the warming

climate, we realize that high-severity fire poses a significant threat to the remaining mature and old-growth forests.

We strongly recommend that mature and old-growth forests be mapped for all Community Protection and Forest Recovery projects and thinning efforts are designed to protect these stands. We recommend mechanical removal of small and intermediate-sized trees and surface litter around remaining mature and old-growth stands and employing hand-thinning, piling, burning, and prescribed fire within the stands. Mechanical thinning within mature and old-growth stands should be minimized as the use of heavy equipment compacts soils and spreads invasive plant species.

Special Land Designations

Wilderness

Alternative I includes a Forest Plan Amendment to allow the use of prescribed fire in the Bucks Lake Wilderness to improve forest health and protect mature forest and wilderness values. FoPW supports this provision of Alternative I. Of the 4,566 acres of Wilderness in the Project Area, we recommend that prescribed fire be used to reduce fuel densities in pine plantations created before Wilderness designation and in areas with dense chaparral in close proximity to State Highway 162. The use of prescribed fire in these locations would improve Wilderness values and protect mature forests.

Wilderness values within the Bucks Lake Wilderness were severely degraded by fire suppression activities associated with the North Complex and Dixie Fire. Eleven miles of bulldozer line constructed within the Wilderness was largely ineffective (see [Bulldozers in the Bucks Lake Wilderness](#)). If fuels reduction projects initiated years ago outside of the Wilderness are completed, complementary treatments surrounding the Wilderness are implemented, and prescribed fire is used in and around the Wilderness there should be no need to use bulldozers and other mechanized equipment for fire suppression within the 23,578 acre Wilderness in the future.

In addition to amending the Forest Plan to allow for prescribed fire in the Wilderness, we strongly encourage the Plumas National Forest to update and approve the 2015 Bucks Lake Wilderness Fire Plan to provide a holistic approach to fire management within and around the Wilderness.

Inventoried Roadless Areas

The Environmental Assessment indicates that the only Inventoried Roadless Area within the Project Area is a small portion (464 acres) of the West Yuba IRA. To retain the primitive character of this area FoPW recommends that prescribed fire be used to improve forest resilience in the IRA.

Wild & Scenic Rivers

Wild River Zones - The EA states only 93 acres of designated Wild River are within the Project Area. All alternatives include manual treatments removing trees less than 10" dbh, pile burning and prescribed fire. FoPW supports manual treatments within Wild River Zones. If prescribed fire alone can be used to improve forest resilience and not threaten communities we recommend foregoing manual treatment to retain the primitive character of these areas. Prescribed fire could likely be used safely for these few acres as they are located within ¼-mile of the Middle Fork Feather River, which provides a significant fuel break.

The EA states 154 acres of Eligible Wild River lie within the Project Area. FoPW supports all Alternatives which include manual treatments, pile burning and prescribed fire along Eligible Wild Rivers in the Project Area. To retain the primitive character of Eligible Wild Rivers within the Project Area, we recommend prescribed fire be used alone if feasible.

Scenic River Zones - Scenic Rivers are largely primitive with shorelines largely undeveloped but accessible in places by roads. Given this legal definition, FoPW does not support the use of mechanical treatments removing trees up to 30" dbh along designated or eligible Scenic River Zones. We support the use of manual thinning of trees up to 10" dbh, pile burning, and prescribed fire along Scenic River Zones.

Recreational River Zones - FoPW supports the use of mechanical treatments removing trees up to 30" dbh in Recreational River Zones to maintain or enhance safety, scenery, protect habitat or prevent insects and diseases.

Special Interest Areas

Special Interest Areas (SIAs) are managed to protect unique scenic, botanic, or geologic values. The EA states 1,959 acres of designated SIAs and 2,865 acres of proposed SIAs are located in the Project Area. FoPW recommends that SIAs with only a few acres in the Project Area be removed: Fowler Lake, Little Volcano, and McRae Meadow. Valley Creek is entirely within the Project Area but has an existing fuels reduction plan that is currently being implemented.

The majority of the Butterfly Valley Botanical SIA, McNab Cypress proposed SIA, and Mount Fillmore proposed SIA are within the Project Area. All of these areas possess unique botanical values of scientific interest. We recommend that the Plumas National Forest work closely with the California Native Plant Society to develop fuels reduction treatments specific to each SIA. California Native Plant Society staff possess a deep knowledge of native plants and have training and experience related to the development of fuels reduction treatments.

Tribal Co-management

In recent meetings with Maidu representatives and community members, FoPW staff and board members found there is a desire in the local Indigenous community to establish areas on the Plumas National Forest where Traditional Ecological Knowledge and cultural burning are employed over long periods of time. The Maidu Stewardship Project (2004-2014) serves as a model for co-management on the Plumas National Forest. Lands tended under the Maidu Stewardship Project fared better during the 2021 Dixie Fire than adjacent Forest Service lands surrounding Greenville, CA. Another example is the leadership role that Mooretown Rancheria has taken with the Feather Falls Post-fire Restoration Project. Given the success of these efforts, we recommend the establishment of long-term (multiple decade) agreements between the Plumas National Forest and Tribal group(s) within a portion of the Project Area where long-term Tribal Co-management, Traditional Ecological Knowledge, and cultural burning are employed. Incorporating Indigenous knowledge in forest stewardship will create more diverse and resilient forests.

Friends of Plumas Wilderness commends the Plumas National Forest for initiating the Central and West Slope Community Protection Project and values the opportunity to provide input on the process. If there are any questions related to our comments please contact me.

Sincerely,



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